ONTARIO REGULATORY MODERNIZATION INDEX (ORMI)

Organizational AI Integration in Ontario Professional Regulation

Emerging Patterns in Governance, Organizational Capability and Regulatory Practice

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Prepared by Upstream Management Solutions

Purpose and use

This Executive Brief examines documented Council and Board attention to artificial intelligence across 13 Ontario professional regulators from January through September 2026. It identifies emerging governance, organizational and professional-practice patterns to inform strategic discussion, without rating individual organizations or their AI maturity.

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Executive Summary

Artificial intelligence has moved beyond a technology-adoption question for professional regulators. It now intersects with governance, public protection, organizational capability, enterprise risk, staff learning, operations and professional practice.

This ORMI review examines 28 distinct substantive AI matters brought to the Councils or Boards of 13 Ontario professional regulators during January–September 2026. Each matter is counted once and assigned one primary analytical category. A matter scheduled for consideration establishes governing-body attention, not necessarily approval or implementation.

The Strategy & Governance category accounts for 7 of 28 matters (25.0%), followed by Professional-Practice Guidance with 6 (21.4%) and Policy & Responsible Use with 5 (17.9%). Risk/Assurance/Oversight accounts for 4 (14.3%); Operations & Service Delivery and Workforce Capability & Learning account for 3 each (10.7%). No matter was classified primarily as Technology/Data/Security, although technology, privacy and security recur as secondary considerations.

The evidence suggests no uniform pathway to AI integration. Some regulators begin with practice guidance; others emphasize enterprise risk, internal policies, executive and Board learning, or controlled deployment. These different entry points are beginning to generate common questions about governance, accountability, capability and public protection.

Organizational AI and professional-practice AI remain analytically distinct but increasingly intersect. Regulators are incorporating AI into existing policies, risk registers, standards, training and workflows rather than treating it solely as a separate technology program.

Executive highlights

- There is no single organizational entry pathway.
- Governance and responsible use are important enabling capabilities.
- Internal organizational AI and registrant-facing professional-practice AI are related but distinct.
- Enterprise risk and Council capability are increasingly visible.
- Different entry points are beginning to converge on similar organizational requirements.

1. Why This Review?

Professional regulators must consider both how their organizations use AI and how registrants use AI in practice. ORMI examined publicly reported Council/Board matters to understand how those responsibilities are taking shape and what they may imply for future regulatory modernization. The review is descriptive and does not assess organizational performance or implementation maturity.

2. Methodology and Evidence Overview

Scope and unit of analysis

The review covers January 1–September 30, 2026, and 13 regulators listed in Appendix A. Sources include public Council/Board packages, committee and Registrar reports, strategic and operational updates, and policies or guidance presented in those materials.

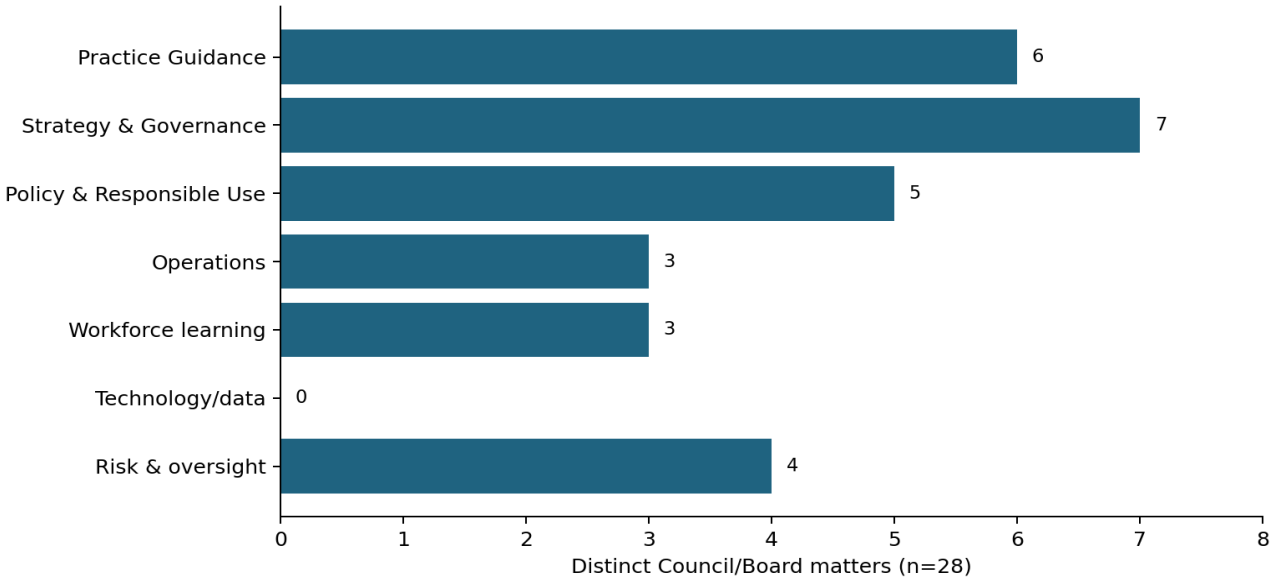
The unit of analysis is one distinct substantive AI matter presented to Council or Board. Reproduced minutes, repeated references and multiple AI capabilities within a single agenda matter are not counted again. A later report may qualify as a new substantive reporting matter when it brings materially new developments to the governing body. Each accepted matter has one primary classification, although it may contribute to other dimensions.

Table 1. Primary classification of distinct Council/Board AI matters

Primary analytical category	Matters	Share
Professional-Practice Guidance	6	21.4%
Strategy & Governance	7	25.0%
Policy & Responsible Use	5	17.9%
Operations & Service Delivery	3	10.7%
Workforce Capability & Learning	3	10.7%
Technology/Data/Security	0	0.0%
Risk/Assurance/Oversight	4	14.3%
Total	28	100.0%

Interpretation: The distribution measures documented substantive governing-body attention, not the proportion of regulators deploying AI or the prevalence of implementation. Technology, privacy and security are evident as secondary aspects despite no Technology/Data/Security primary classification.

Figure 1. Distribution of 28 AI matters by category (13 regulators)



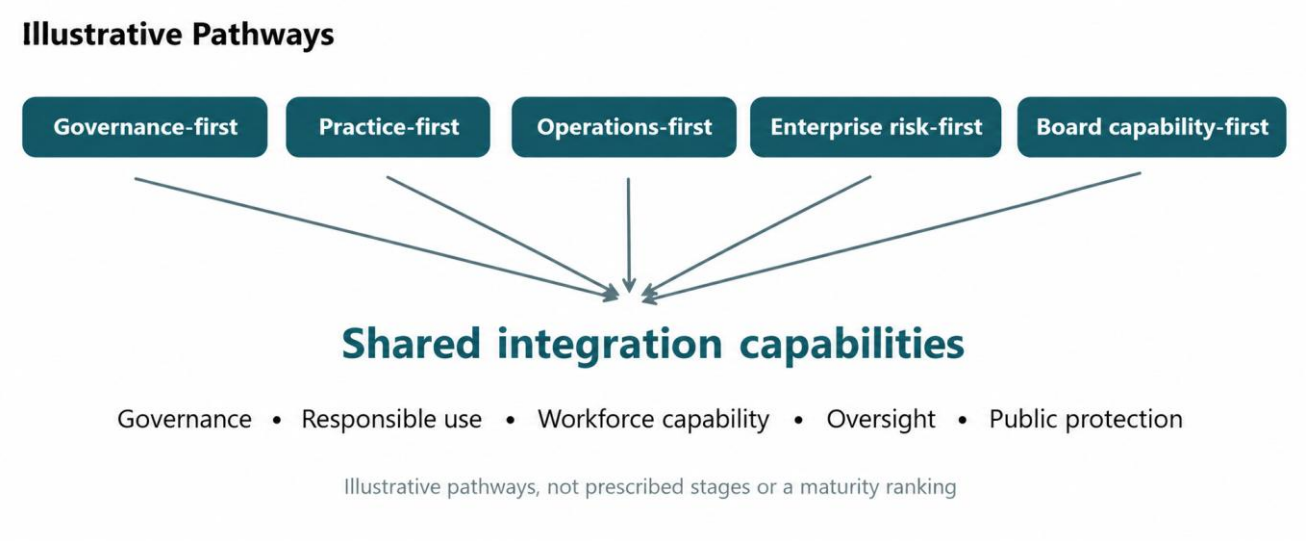
Coding and evidence limitations

The seven analytical categories are descriptive classifications, separate from the four capability dimensions of the AII Framework. Each record identifies its primary subject, relevant secondary capabilities, reported stage (proposed, considered, approved or implemented when substantiated), source and confidence limits. Organizational significance reflects potential relevance to governance and public protection, not organizational performance. Evidence drawn from public records may omit internal activity. The 28-matter register is organized by regulator in Appendix B.

3. Seven Emerging Findings

Finding 1. There Is No Single Organizational Pathway to AI Integration

Regulators are approaching AI from different immediate needs rather than following a standard sequence. CCO considered internal AI use and professional-practice guidance as separate Council matters in February. CPBAO explicitly identified AI as an enterprise risk in March. PEO reported an enterprise AI roadmap followed by Copilot testing. CPO reported controlled internal Copilot adoption in March and practitioner guidance in June. These examples illustrate different entry points, not competing maturity levels.



ORMI observation: Entry pathways are contextual; the evidence does not establish a universal order of implementation.

Finding 2. Governance Is Establishing the Conditions for AI Integration

Governance is becoming a practical enabling condition for responsible AI use. CMLTO reported implementation of an AI governance framework and register in May, followed by September reporting on operational policy, tool approval and reassessment controls. RCDSO described a cross-departmental, risk-based internal AI framework in June. COKO scheduled its draft organizational AI policy for a Council decision in June; approval cannot be inferred from the draft agenda alone.

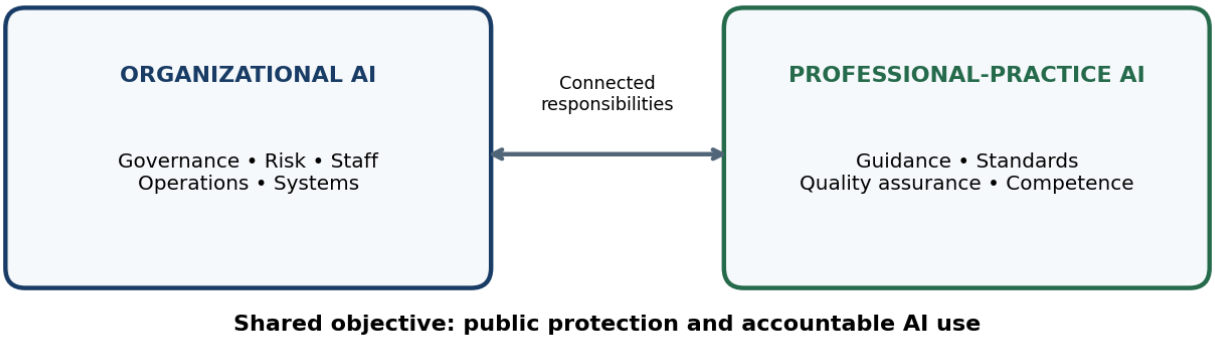
Executive implication: Regulators may benefit from explicit accountability, tool authorization, staff guidance, monitoring and reporting before expanding operational deployment.

Finding 3. Organizational AI and Professional-Practice AI Are Developing Along Parallel Pathways

Organizational AI concerns the regulator's own policies, staff, systems, security and governance; professional-practice AI concerns registrants' responsibilities and public protection. CCO considered internal policy I-024 and professional guideline G-017 separately in February. CPO reported internal Copilot safeguards in March and practitioner-facing guidance in June. CPSO reported operational AI applications in May and proposed physician obligations in September; CNO proposed AI-related privacy expectations for nurses in September.

The two streams may intersect through complaints, quality assurance, continuing competence, practice advice and enterprise risk. Their interaction matters because internal regulatory capabilities may need to respond to AI-enabled professional practice. Proposals should not be described as approved standards without confirming decisions.

Figure 2. Two connected AI responsibilities



Finding 4. Enterprise Risk Is Emerging as an Important AI Integration Pathway

AI is increasingly considered through existing risk and assurance systems. CPBAO's March integrated risk reporting expressly identified use of AI as an enterprise risk. OCP's June risk materials identified AI use by registrants as a public-protection risk. RCDSO's February risk universe identified AI-related uncertainty and its June materials connected internal AI controls with security and professional guidance.

ORMI observation: Enterprise risk processes offer a means of connecting privacy, reliability, public protection and operational oversight; the evidence does not establish comparable risk maturity across regulators.

Finding 5. Governance Capability Is Becoming a Strategic Priority

Council and Board members need sufficient understanding to exercise oversight. COKO's March agenda scheduled an AI information session. CASLPO's June Board effectiveness materials identified AI education as a proposed learning priority; the proposed session is not evidence of delivery. CMLTO's February and May reporting connected staff AI literacy, baseline assessment and implementation controls, while RCDSO reported executive AI strategy education in April.

Executive implication: Education, questioning capacity and periodic oversight may become as important as formal policy approval.

Finding 6. Different Organizational Pathways Are Beginning to Converge

Despite different entry points, recurring capabilities include governance, responsible use, staff learning, risk management, assurance and public protection. RCDSO's cross-departmental AI working group linked internal governance with risk-based adoption; CMLTO's register, operational controls and training connected policy to implementation. These cases illustrate convergence in the capabilities receiving attention, not a proven common sequence or equivalent levels of maturity.

ORMI observation: Organizations can begin in different places while ultimately needing to answer similar questions about accountability, safeguards, implementation and oversight.

Finding 7. AI Is Being Integrated into Existing Organizational Systems

AI is appearing within established regulatory processes and enterprise tools. PEO reported limited Copilot testing in March minutes reproduced in June. CPSO's May Board minutes described an AI virtual assistant for routine renewal inquiries, AI-supported draft decision writing in controlled systems and expanded Copilot access. CMLTO reported tool lifecycle controls and staff training; COTO and CNO addressed AI through existing ethics and privacy-standard processes.

These examples support a shift from isolated technology experimentation toward AI integrated with operations, governance and professional standards. The available evidence does not establish that every proposed or piloted application reached full deployment.

4. Cross-Cutting Observations

Organizational capability matters at least as much as tool selection. Governance can enable rather than merely constrain implementation, and professional-practice and internal-use responsibilities increasingly interact. There is limited public evidence of formal coordinated AI initiatives across the reviewed regulators; shared governance concepts and technology platforms may indicate knowledge diffusion, but coordinated implementation should not be assumed.

Knowledge diffusion across the sector

The review found limited public evidence of formal, coordinated AI implementation initiatives among the regulators studied. Nevertheless, common governance concepts, shared productivity platforms, publicly available professional guidance and resources from other jurisdictions suggest opportunities for inter-regulatory learning. This is an observation about possible knowledge diffusion, not proof of collaboration or common maturity.

Executive implication: Sharing governance tools, responsible-use policies, staff education and implementation lessons may reduce duplication while allowing each regulator to adapt safeguards to its mandate.

5. Discussion

The strategic question for regulators is not simply whether to adopt AI, but how to integrate and govern it consistently with public-protection responsibilities. The evidence favors a flexible, capability-based approach rather than a single prescribed technology roadmap. Leaders may begin with the most pressing risk or opportunity while progressively strengthening complementary capabilities.

6. Looking Ahead

Future ORMI monitoring should track (1) adoption and effectiveness of governance controls, (2) Council and staff capability, (3) registrant-facing guidance and standards, (4) privacy, cybersecurity and AI assurance, (5) operational and workflow integration, (6) agentic AI applications, and (7) demonstrable effects on regulatory service, public protection and organizational performance. Reporting on implementation outcomes will help distinguish discussion, approval and realized value.

7. Relationship to the AI Integration Framework

The ORMI review describes observed activity. Upstream Management Solutions' AI Integration (AII) Framework provides a separate organizational capability model with four interdependent dimensions: Strategy & Direction; Policy & Responsible Use; Operations & Organizational Capability; and Oversight & Assurance. The seven categories used for quantitative evidence coding are not identical to those four dimensions. The review informs the Framework without constituting a maturity assessment of the organizations studied.

Appendix A. Organizations Included in the Review

Code	Organization
CNO	College of Nurses of Ontario
COTO	College of Occupational Therapists of Ontario
OCP	Ontario College of Pharmacists
PEO	Professional Engineers Ontario
RCDSO	Royal College of Dental Surgeons of Ontario
CASLPO	College of Audiologists and Speech-Language Pathologists of Ontario
CPBAO	College of Psychologists and Behaviour Analysts of Ontario
CCO	College of Chiropractors of Ontario
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CMLTO	College of Medical Laboratory Technologists of Ontario
CPSO	College of Physicians and Surgeons of Ontario
CPO	College of Physiotherapists of Ontario

Appendix B. Source-Level Evidence Register by Regulator (28 Matters)

Entries are grouped alphabetically by regulator and chronologically within each organization. Each row represents one distinct substantive Council/Board matter. Dates are meeting dates (including the dates of reproduced minutes), and descriptions distinguish proposals from confirmed implementation. Page references are given where available; otherwise the cited meeting package and agenda item identify the source.

CASLPO — College of Audiologists and Speech-Language Pathologists of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-06-12	Proposed AI Board education Primary: Workforce Capability & Learning	June Board package pp.104–105	Planned, not delivered

CCO — College of Chiropractors of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-02-20	Organizational AI-use policy Primary: Policy & Responsible Use	February Council package; internal policy I-024	Separate policy matter
2026-02-20	Professional AI-use guideline G-017 Primary: Professional-Practice Guidance	February Council package; G-017; June confirms effective Apr 23	Separate guidance matter
2026-04-23	Follow-up organizational AI policy Primary: Policy & Responsible Use	April Council package; I-024	April Council pp.194–195: recommendation to approve revised I-024 following February feedback; distinct April decision item.

CDTO — College of Dental Technologists of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-06-19	AI Board and registrant survey and planned guidance Primary: Strategy & Governance	June Board minutes §8.2	June matter; September copy excluded

CMLTO — College of Medical Laboratory Technologists of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-02-12	AI implementation progress, training and baseline survey Primary: Strategy & Governance	February Board package	2025 approvals not counted as 2026 approvals

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-05-25	AI register, governance toolkit and implementation education Primary: Policy & Responsible Use	May Board package pp.45–50	One implementation reporting matter
2026-09-14	AI Implementation Plan progress: operational governance policy, tool controls and staff training Primary: Strategy & Governance	September Board package, agenda 3.4.3, PDF pp. 43–45	Implementation reporting; foundational approvals in 2024–25; August staff training reported

CNO — College of Nurses of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-03-12	Retrospective AI governance and professional guidance reporting Primary: Strategy & Governance	March Council strategic reporting	March Council p.142: substantive retrospective strategic-plan reporting on 2024–25 AI initiative; count 2026 Council attention, not a 2026 launch.
2026-06-04	Strategic reporting and proposed AI Council development Primary: Workforce Capability & Learning	June Council strategic reporting and development plan	Education proposed, not delivered
2026-09-24	Proposed revised Confidentiality and Privacy practice standard addressing AI Primary: Professional-Practice Guidance	September Council package, item 8.1.2, PDF pp. 82–85, 103	Decision sought; approval/effective date not confirmed

COKO — College of Kinesiologists of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-03-30	AI Council information session Primary: Workforce Capability & Learning	March public Council agenda item 15	Session scheduled; outcomes not established
2026-06-22	AI organizational policy Primary: Policy & Responsible Use	June ORMI indexed Council policy matter	Draft agenda item 11 marked Decision; Council consideration documented, approval not verified.

COTO — College of Occupational Therapists of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-03-26	Patient-relations AI public Q&A / readiness report	March Board committee / Registrar report	March Board p.50: Patient Relations Committee

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
	Primary: Professional-Practice Guidance		reported public AI Q&A; count once within March reporting, not as separately approved guidance.
2026-06-18	Code of Ethics AI-related consultation and companion guidance Primary: Professional-Practice Guidance	June Board Code of Ethics consultation	Proposal; not assumed final approval

CPBAO — College of Psychologists and Behaviour Analysts of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-03-27	AI in integrated enterprise risk register Primary: Risk/Assurance/Oversight	March Board package p.63	June standards working group excluded

CPO — College of Physiotherapists of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-03-27	Internal Microsoft Copilot adoption, AI-use policy and governance safeguards Primary: Strategy & Governance	March 2026 Board package, Registrar's Report, PDF p.31	Internal organizational AI; group related controls as one Board reporting matter.
2026-06-18-19	AI professional-practice guidance refresh and Board/committee-use safeguards Primary: Professional-Practice Guidance	June 2026 Board package, PDF pp.101,156–159	Practitioner guidance is the primary matter; internal Board-use safeguards are contextual.

CPSO — College of Physicians and Surgeons of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-05-28	Secure operational AI applications and Copilot Primary: Operations & Service Delivery	May Board minutes reproduced in September package pp.5–6	One Registrar reporting matter
2026-09-24	Proposed core AI obligation and companion professional-practice guidance Primary: Professional-Practice Guidance	September Board package, pp. 50–51, 80, 162	Proposal for Board consideration; approval not established

OCP — Ontario College of Pharmacists

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-03-23	AI regulatory and organizational risk reporting Primary: Risk/Assurance/Oversight	March Board Registrar / risk reporting	March Board p.112: Registrar expressly raised AI in operations and regulation; one reporting matter; no standalone risk-register approval inferred.
2026-06-15	AI registrant risk and operational automation reporting Primary: Risk/Assurance/Oversight	June Board mid-year risk and Registrar reports	June Board pp.116,164–166: Registrar automation exploration and explicit registrant AI enterprise risk; count one grouped Board reporting matter.

PEO — Professional Engineers Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-02-20	Enterprise AI roadmap in operational planning Primary: Strategy & Governance	February Council package p.43	Exclude unrelated legislative modernization
2026-03-27	Copilot pilot and rollout preparations Primary: Operations & Service Delivery	March Council minutes reproduced in June package p.15	March 27 Council minutes reproduced in June package p.15: CEO reported Copilot small-group testing and fielded AI questions.

RCDSO — Royal College of Dental Surgeons of Ontario

Meeting date	AI-related matter / primary category	Source	Evidence status / qualification
2026-02-19	AI risk and AI in Dentistry guidance reporting Primary: Risk/Assurance/Oversight	February Council package pp.76,95	One Council reporting matter; avoid duplicated minutes
2026-04-16	Executive AI education and risk-based approach Primary: Strategy & Governance	April Council package p.77	Registrar progress reporting
2026-06-18	Internal AI framework, working group and risks Primary: Policy & Responsible Use	June Council package pp.376–379,407–408	One cross-departmental framework matter
2026-06-18	QA use of AI for question development Primary: Operations & Service Delivery	June Council package p.219	Separate committee report