

Changes Coming into Effect January 1, 2026: Interprovincial Mobility for Regulated Professionals

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Effective January 1, 2026, a new “As of Right” framework will apply. This new framework sets out a process for out-of-province individuals who are already certified elsewhere in Canada to apply to be *deemed certified* in certain regulated occupations in Ontario. We understand that this is intended to eliminate certain interprovincial barriers and allow eligible workers from other Canadian provinces and territories to relocate to Ontario more quickly and with fewer obstacles.

On November 3, 2025, Bill 56, Building a More Competitive Economy Act, 2025 (“**Bill 56**”) received Royal Assent.^[1] Bill 56 amended the *Ontario Labour Mobility Act, 2009* (“**OLMA**”) and the *Regulated Health Professions Act* (“**RHPA**”). It is important that regulators understand the requirements imposed by these changes and seek legal advice as appropriate. Below, we provide a snapshot of certain key aspects of the regimes.

New “As of Right” framework for regulated professionals under the *Ontario Labour Mobility Act, 2009*

The OLMA was amended to include certain rules that will apply with respect to individuals who are deemed certified in a regulated occupation and permitted to practice a regulated profession in Ontario.^[2] Bill 56 also added a corresponding regulation-making authority to section 25 of the OLMA, leading to the introduction of O. Reg. 199/25: Deemed Certification (“**Regulation**”). The Regulation establishes specific requirements for individuals to be deemed certified. The Ontario regulatory authorities to which this applies to include the Law Society of Ontario, the Ontario College of Teachers, the Chartered Professional Accountants of Ontario, the Ontario Securities Commission, the Ontario College of Social Workers and Social Service Workers, the College of Early Childhood Educators, the Financial Service Commission of Ontario, and others.^[3]

Under the As of Right framework, out-of-province individuals who are already certified in a designated regulated occupation by another Canadian regulatory authority may be deemed certified in Ontario for a single (non-renewable) six-month period, provided they satisfy certain prescribed criteria,^[4] which include:

- **Attest to good standing:** individuals must confirm that they are in good standing in their jurisdiction, that no out-of-province regulator has denied them certification within the past two years, that they are not facing any current professional misconduct proceedings, and that they have not had a finding of professional misconduct, incompetence or incapacity made against them in relation to the regulated profession.^[5]
- **Exam requirements:** If the Ontario regulatory authority imposes a requirement to complete an examination (which is not material for the purposes of paragraph 3 of subsection 9(5) of the OLMA), it can require the individual applying to be certified in Ontario to attest to their knowledge of matters applicable to the practice of the regulated occupation in Ontario. Subject to certain other requirements, the individual may be required to complete an exam.^[6]
- **Additional requirements:** Ontario regulators may still require individuals to meet certain additional conditions in order to practice in the province, like securing malpractice insurance, completing a police record check, or be employed, authorized or

sponsored by a licensee or registrant.[\[7\]](#)

The recent legislative changes further outline key requirements for Ontario regulators implementing the As of Right certification process in the new year, including:

- **Certification timelines:** where an individual provides the regulator with the required application information, the regulator must send a notice to acknowledge its receipt within 10 business days. The out-of-province individual is deemed to be certified in the regulated occupation in Ontario for six months upon receipt of the notice.[\[8\]](#)
- **Restrictions on additional requirements:** regulators generally cannot require individuals applying for certification under the As of Right process to have, undertake, obtain or undergo any material additional training, experience, examination, or assessment.[\[9\]](#)
- **Public transparency:** regulators must post certain information on a publicly accessible website maintained by the regulatory authority.[\[10\]](#)

Changes to existing As of Right rules for Health-Care Workers under the *Regulated Health Professions Act*

Bill 56 also brought changes to the existing As of Right rules for health care workers under the RHPA by amending the Health Professions Procedural Code in Schedule 2 to establish a new procedure for out-of-province applicants who apply for registration with a health profession College that is “prescribed in the regulations”.[\[11\]](#) As of January 1, 2026, individuals licensed in another Canadian province or territory who meet the eligibility criteria can practice in Ontario for up to six months while completing their registration requirements with the Ontario regulator.

The information and comments herein are for the general information of the reader and are not intended as advice or opinion to be relied upon in relation to any particular circumstances. For particular application of the law to specific situations, the reader should seek professional advice.

[\[1\]](#) Bill 56, [Building a More Competitive Economy Act](#), 2025 (Royal Assent on November 3, 2025).

[\[2\]](#) Bill 2, [Protect Ontario Through Free Trade Within Canada Act](#), 2025 (Royal Assent on June 5, 2025). Bill 2 enacted s. 10.1 of the OLMA which provides for the deemed certification of individuals already certified by an out-of-province regulatory authority to practice a regulated occupation in Ontario in certain circumstances for a one-time six-month period of time. Bill 56 amended s. 10.1 to include certain rules that apply with respect to individuals who are deemed certified in a regulated occupation under that section.

[\[3\]](#) *Ontario Labour Mobility Act, 2009*, S.O. 2009, c. 24 at [Table 1](#).

[\[4\]](#) *Ontario Labour Mobility Act, 2009*, S.O. 2009, c. 24 at s. [10.1\(2\)](#).

[\[5\]](#) O. Reg. 199/25: DEEMED CERTIFICATION at s. [4\(2\)1](#).

[\[6\]](#) O. Reg. 199/25: DEEMED CERTIFICATION at s. [4\(2\)](#) and s. [6](#).

[\[7\]](#) O. Reg. 199/25: DEEMED CERTIFICATION at s. [4\(2\)](#).

[\[8\]](#) *Ontario Labour Mobility Act, 2009*, S.O. 2009, c. 24 at s. [10.1\(3\)](#).

[\[9\]](#) *Ontario Labour Mobility Act, 2009*, S.O. 2009, c. 24 at s. [9\(2\)](#); see also O. Reg. 199/25: DEEMED CERTIFICATION at s. [4](#).

[\[10\]](#) *Ontario Labour Mobility Act, 2009*, S.O. 2009, c. 24 at s. [11\(a\)-\(b\)](#).

[\[11\]](#) Health Professions Procedural Code at Schedule 2 of the RHPA, at s. [22.19](#).

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