#40

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 04, 2023 10:36:54 AM
Last Modified: Thursday, September 21, 2023 3:17:43 PM
Time Spent: Over a month
IP Address: 24.157.74.169

Page 1: Fair Registration Practices Report 2022

Q1

Please indicate which regulator you are and your main point of contact should we require follow up.

College of Occupational Therapists of Ontario
Contact person – Leandri Engelbrecht lengelbrecht@coto.org. Manager of Registration

Q2

Section 1 - During the reporting period (January 1st–December 31st, 2022), please indicate if your organization has introduced any changes in the following areas impacting your registration processes by clicking on each of the appropriate boxes below.Registration requirements either through regulation, by-law or policy.

Yes,

Description of change/improvement that would impact fair registration outcomes:

The registration committee approved an amendment to our language Fluency Requirement policy and now includes the language fluency tests individuals use for immigration purposes. See details question 19.

Q3

Assessment of qualifications

Yes,

Description of change/improvement that would impact fair registration outcomes:
The Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) operates a single, centralized process for the assessment of educational qualifications and competencies of Internationally Educated Occupational Therapists (IEOTs) called the Substantial Equivalency Assessment System (SEAS). In 2022 – the Extenuating Circumstances policy was developed on behalf of the regulators. SEAS recognizes that illness and extenuating circumstances may affect an IEOTs participation in the competency assessment. The policy outlines the standards and process for IEOTs to request another attempt at the competency assessment when they believe that illness or other extenuating circumstances affected their assessment results. Details of the policy are outlined on the SEAS website.

Q4

Timelines for registration, decisions and/or responses

No

Q5

Registration and assessment fees

Yes,

Description of change/improvement that would impact fair registration outcomes:
The fees regarding the Substantial Equivalency Assessment System (SEAS) program for Internationally Trained Occupational Therapists (IEOTs) have increased during 2022. The fees are paid in installments dependent on successful completion of each step: • Step 1: Initial Application fee installment increased from $300 to $400 • Step 2: Jurisprudence Test (JKAT) and Profession Specific Credential Assessment (PSCA) increased from $1300 to $1500 • Step 3: Competency Assessment- increased from $2000 to $2100 SEAS applicants can pre-pay the phase 3 fee at $2000 while in phase 2, up to June 1. The total fee increased a total of $400 from $3600 to $4000

Q6

Resources for applicants

Yes,

Description of change/improvement that would impact fair registration outcomes:
There is a new competency gap filling course now available to Internationally Educated Occupational Therapists (IEOTs) applicants The gap-filling course is now being delivered by the University of Alberta. It is a newly developed course specifically for IEOTs and was piloted in mid 2022. The course is titled "Critical Thinking, Clinical Reasoning and Application in Canadian Occupational Therapy." The course supports IEOTs to better understand clinical reasoning within the Canadian Practice Context. The course is delivered 3 times per year, an improvement from once per year by the previous provider. It is a remote-delivered course with both synchronous and asynchronous learning opportunities.

Q7

Changes to internal review or appeal process

No

Q8

Access by applicants to their records

No

Q9

Mutual recognition agreements

Yes,

Description of change/improvement that would impact fair registration outcomes:

Effective June 1st, 2021, occupational therapists registered in other provinces who are providing virtual services to clients in Ontario can do so based on their existing registration in the province where they are located. The rules for in-person services are unchanged in that occupational therapists providing in-person services to a client residing in Ontario must obtain temporary or general registration in Ontario. In 2022, the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) negotiated a draft mutual recognition agreement (MOU) setting out the terms for occupational therapists to provide virtual (Remote) occupational therapy services to Canadians based on the existing registration in the province they are located. The MOU is expected to be confirmed in 2023. With advances in technology, clients, occupational therapists, employers, and other interested parties are seeking alternatives to in-person interactions. This can increase access to occupational therapy services and enable continuity of care when a client or therapist relocates.

Q10

Training and resources for staff regarding registration

Yes,

Description of change/improvement that would impact fair registration outcomes:

The Registration Committee and program staff receive annual training on bias and human rights considerations. Assessors in the SEAS program and those on the SEAS determination committee also receive human rights training. The College actively seeks internationally educated OT Professional Committee appointments

Q11

Relationship with third party service provider(s)

Yes,

Description of change/improvement that would impact fair registration outcomes:

The College has been working with the third party who completes the accreditation process for university programs in Canada for occupational therapists. The goal is to improve the governance on a national scale.

Q12

Accreditation of educational programs

Yes,
Description of Change/Improvement that would impact Fair Registration Outcomes:
The university of Ottawa was granted accreditation in 2023 but the Accreditation period is for Oct 2022 – Oct 2029. The College monitors the accreditation status of each university in Canada and continues to participate in the accreditation process for Ontario university occupational therapy programs.

Q13

Technological or digital improvements

Yes,
Description of Change/Improvement that would impact Fair Registration Outcomes:
The College is in the process of transitioning to a new enterprise system. We expect the new system will improve overall applicant user experience. This has been a three-year project that is in process of being implemented in 2023. This new system will also enable the College to more precisely track application data related to timelines and manage applicant inquiries and supports.

Q14

Anti-racism and inclusion-based policies and practices

Yes,
Description of Change/Improvement that would impact Fair Registration Outcomes:
In 2022, the college registration and the SEAS program operations, began implementing the Competencies for Occupational Therapists in Canada, 2021-a Pan Canadian guide to competence of OTs who work OR plan to work in Canada. The competencies acknowledge the presence and impact of systemic racism in Canada. This has great meaning for the role competencies have in shifting both our registration policies and practices; and how we approach the systemic and individual issues that may present during the registration process. Knowledge and guided implementation of the competencies during the SEAS process prepares IEOTs to successfully practice OT in Canada. In December 2022, the college developed and implemented an Impact Assessment in Registration based on Global Diversity, Equity, and Inclusion Benchmarks (GDEIB). The GDEIB is published by the Centre for Global Inclusion (https://centreforglobalinclusion.org/) and changes/improvements to practices will occur in 2023.

Q15

Organizational structure

No

Q16

Contingency or continuity of operations plans

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:
The College has a risk management program and continually reviews, reassesses risks and ensures appropriate mitigation strategies are in place. The risks that have been categorized as high or critical risks were brought forward to the Board for review on a quarterly basis.

Q17

Documentation requirements for registration

No

Q18

English / French language proficiency testing

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:
The registration committee approved an amendment to our language Fluency Requirement policy to include the language fluency tests used for immigration language fluency- See below: College Language Fluency Requirement Acceptable tests and scores are as follows: Test Details Minimum Score 1.Test of English as a Foreign Language (TOEFL) Speaking 26 Listening 22 Reading 22 Writing 22 Overall score 92 2. International English Language Testing System Academic (IELTS GT) Speaking 6.5 Listening 7.0 Reading 7.0 Writing 6.5 Overall score - 3. Canadian English Language Proficiency Index Program (CELPIP General)l Speaking 8 Listening 8 Reading 9 Writing 8 Overall score - 4. Test d'Evaluation du Français (TEF) TEF Canada, TEF Quebec and TEF 5 épreuves Speaking 349 Listening 280 Reading 248 Writing 349 Overall score - 5. Test de connaissance du français (TCF) TCF Canada, TCF Quebec, TFC Tout Public results Speaking 12 Listening 503 Reading 524 Writing 12 Overall score -

Q19

Section 2 – If applicable, please list your organization's top three accomplishments during the reporting period that relate to fair registration practices.

1	**COTO collaborated nationally on harmonizing registration processes Re-Entry to Practice – with a goal of moving toward same regulatory history confirmation forms; same competency assessment and refresher program framework**
2	**COTO development of Enterprise System for management and coordination of data and registration processes**
3	**The Implementation of Equity Impact Assessment for registration program. The program started to use this tool to identify any potential impacts to equity deserving groups. This tool further assists the program to ensure that mitigating steps are taken in the case that there is a potential negative impact.**

Q20

Section 3 – If applicable, please list the top three risks that impacted your organization's ability to achieve better registration outcomes for applicants during the reporting period. Please also indicate the measures you have taken to mitigate the impacts of these risks.

1	**Health Human Resource Crisis - -mitigated through the agreement between COTO and SEAS to provide a reliable and valid process for assessment. Other mitigating activities include continuance of the National Occupational Therapy Certification Exam and SEAS (IEOTs assessments) in a virtual format to ensure timely registration of applicants continue as well as enabling SEAS applicants to complete assessments outside of Canada. --Addition of third sitting annually for National Occupational Therapy Certification Exam**
2	**Public access and risk related to virtual services - -mitigated through discussions with ACOTRO to provide remote OT services from any province**

Q21

Section 4 – Do you believe that you have a Canadian Experience Requirement (CER)? If so, please describe the applicant competencies that you seek to develop through this requirement in the comment box below CER: work experience or experiential training obtained in Canada.

No

Q22

QUANTITATIVE SECTION The following quantitative information is collected for the purpose of discerning statistical changes and trends related to a regulator's membership, application volumes, licensure/certification results, and appeals year over year. Languages Indicate the languages in which you make available application materials and information about the application process.

English ,

French

Q23

Membership Data Demographics Data As of December 31, 2022, please indicate the number of members in each gender category identified below and the number of total members.

Total Male	**602**
Total Female	**6281**
Total Non-binary	**6**
Gender not provided	**0**
Overall Total	**6889**

Q24

In relation to your members: Do you collect race-based data?

No

Q25

Do you collect other identity-based or demographics data?

Yes,
Other (please specify):
We collect data about indigenous identity

Q26

Do you plan to collect race-based data in the future?

Yes,
If yes, please indicate the type::
Yes, we have started the groundwork in 2023 to collect sensitive data including race-based data

---

Q27

Class of License/Certificate Data As of December 31, of the reporting year, please indicate the number of members under each class or license category as applicable.

Full/Independent Practice	**6647**
Provisional/Limited License/Certificate	**242**
Emergency License/Certificate	**0**
All other classes	**0**
Overall Total	**6889**

Q28

Jurisdiction where members were initially trainedAs of December 31, of the reporting year, please indicate the membership type and total number of registered members for each category listed below.

Ontario	**5700**
Other Canadian Provinces and Territories	**594**
USA	**186**
Other Countries	**409**
Multiple and/or Unspecified Jurisdiction	**0**
Total	**6889**

Q29

Please indicate the total number of registered members for the top 12 international countries or jurisdictions where these individuals obtained their initial education in the profession or trade.

1	**USA/ 183**
2	**Great Britain/ 98**
3	**India/ 91**
4	**Australia / 53**
5	**Philippines / 40**
6	**Hong Kong/ 30**
7	**Iran/ 15**
8	**South Africa/ 14**
9	**Pakistan/ 12**
10	**Brazil / 8**
11	**Ireland/ 7**
12	**Israel/ 7**

Q30

Applications Data Demographics Data Indicate the number of applicants who filed an application between January 1 and December 31 of the reporting year, in each applicable category.

Total Male	**41**
Total Female	**500**
Total Non-binary	**2**
Gender not provided	**0**
Overall Total	**543**

Q31

In relation to the applications, you received:Do you collect race-based data?

No

Q32

Do you collect other identity-based or demographics data?

Yes,

If yes, please indicate the type: :
We collect data about indigenous identity

Q33

Category of Applicants Number of applicants who voluntarily or involuntarily (through inactive and lapsed applications) withdrew from the application process between January 1 and December 31, 2022:

12

Q34

Please indicate the total number of applicants from Ontario who filed an application between January 1 and December 31, 2022 for the following categories as applicable.

Number of Applicants	**433**
Number of Applicants Licensed/Certified	**422**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**5**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q35

Please indicate the total number of applicants from Canadian provinces and territories (excluding Ontario) who filed an application between January 1 and December 31, 2022 for each of the following categories as applicable.

Number of applicants	**53**
Number of applicants fully licensed/certified	**48**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**9**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q36

Please indicate the total number of certificate-to-certificate (labour mobility) applicants who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	**27**
Number of applicants fully licensed/certified	**24**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**4**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q37

Please indicate the total number of applicants from international jurisdictions (not including USA) who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	**42**
Number of applicants fully licensed/certified	**38**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**17**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q38

Please indicate the total number of applicants from multiple and/or jurisdictions not specified who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	**0**
Number of applicants fully licensed/certified	**0**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**0**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**0**

Q39

Please indicate the total number of applicants from accredited Canadian post-secondary institutions who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	**484**
Number of applicants fully licensed/certified	**468**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**5**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q40

Please indicate the total number of applicants who re-registered after withdrawing from the application process between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	**13**
Number of applicants fully licensed/certified	**5**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**10**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q41

Please provide any additional comments you may have for questions 33-41.

Regarding questions 34 - 41. The system would not allow me to sub it any numbers with decimals, but on average it only takes us 0.2 weeks or 1 day to complete an application once we have received all the documents. I rounded the figures up to one to be able to submit the survey.

Q42

Jurisdiction where applicants obtained their initial educationPlease indicate the total number of applicants for the top 12 international countries or jurisdiction where applicants obtained their initial education in the profession or trade.

1	**Great Britain / 11**
2	**USA/ 10**
3	**Hong Kong/ 9**
4	**Australia / 7**
5	**India / 5**
6	**Ireland/ 2**
7	**Brazil/ 1**
8	**Iran/ 1**
9	**Jordan/ 1**
10	**Pakistan/ 1**
11	**Philippines/ 1**

Q43

Processing Time As of December 31, 2022, how many full licenses/certificates did your organization issue?

507

Q44

Please indicate the total number of applicants who received full licensure/certification between January 1 and December 31, 2022, according to the following timelines.

0 – less than 3 months	**449**
3 months – less than 6 months	**32**
6 months – less than 12 months	**21**
12 months – less than 18 months	**3**
24 months and greater	**2**

Q45

Age of Active Applications As of December 31, 2022 what were the total number of active applications in your case inventory?

71

Q46

Please provide a breakdown (and total) of active applications according to the length of time (age) that they have been open.

0 – less than 3 months	**31**
3 months – less than 6 months	**23**
6 months – less than 12 months	**12**
12 months – less than 18 months	**2**
18 months – less than 24 months	**3**
24 months and greater	**0**
TOTAL	**71**

Q47

Other Licenses/Certificates of Registration ProcessedPlease indicate the number of applicants who were issued an alternative class of license* that your organization processed in the reporting year (January 1-December 31, 2022).Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.* An alternative class of license/certificate enables the holder to practice with limitations, but additional requirements must be met for the member to be fully licensed/certified.

Ontario	**0**
Other Canadian Provinces and Territories	**1**
Certificate to Certificate (Labour Mobility)	**1**
USA	**0**
Other International	**2**
Multiple and/or Unspecified Jurisdictions	**0**
TOTAL	**4**

Q48

Other Licenses/Certificates of Registration ProcessedPlease indicate the number of applications, If applicable, who were issued an emergency license/certificate that your organization processed in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces and Territories	0
Certificate to Certificate (Labour Mobility)	0
USA	0
Other International	0
Multiple and/or Unspecified Jurisdictions	0
TOTAL	0

Q49

Other Licenses/Certificates of Registration ProcessedPlease indicate the number of Provisional license/certificate or alternative class of license/certificate holders who were fully licensed/certified by your organization which were processed in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	232
Other Canadian Provinces and Territories	2
Certificate to Certificate (Labour Mobility)	0
USA	1
Other International	5
Multiple and/or Unspecified Jurisdictions	0
TOTAL	240

Q50

Number of Reviews and Appeals Processed State the number of reviews and appeals that your organization processed in the reporting year (January 1-December 31, 2022). For applicants who were subject to an internal review or who were referred to a statutory committee of your governing council, such as a Registration Committee. Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces	0
USA	0
OtherCountries	5
Multiple and/or Unspecified Countries	0
TOTAL	5

Q51

State the number of reviews and appeals that your organization processed in the reporting year (January 1-December 31, 2022). For applicants who initiated an appeal of a registration decision. Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces	0
USA	0
OtherCountries	0
Multiple and/or Unspecified Countries	0
TOTAL	0

Q52

State the number of reviews and appeals heard in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces	1
USA	0
OtherCountries	0
Multiple and/or Unspecified Countries	0
TOTAL	1

Q53

State the number of registration decisions changed following an appeal and/or review that your organization processed in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces	0
USA	0
OtherCountries	0
Multiple and/or Unspecified Countries	0
TOTAL	0

Q54

List the top three reason for appeals (by percentage) of a registration decision

1	**Not Applicable**

Q55

List the top five reasons (by percentage) for not Issuing a License/Certification to Internationally Trained Individuals

1	**Failed Entry exam 3 times - 100%**

Q56

List the top Five Reasons (by percentage) for not Issuing a License/Certification to Canadian Graduates

1	**Did not meet currency requirement - 71%**
2	**Failed entry exam 3 times - 29%**

Q57

Please provide any additional comments you may have:

The numbers in Q56 and Q57 do not match the number of expired applications as some applications span over more than one reporting year. The College is happy to provide a more detailed breakdown if it is required.