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Q1

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

College of Occupational Therapists of Ontario
Leandri Engelbrecht: lengelbrecht@coto.org

Q2

Section 1 - During the reporting period (January 1st– December 31st, 2021), 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:

Virtual Services 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 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. The College is taking the position that occupational therapy service delivery occurs in the province where the occupational therapist is registered, rather than where the client resides. This means the occupational therapist must follow the rules and regulations of the province where they are registered. If a client has a complaint or concern about the service they received, they can file this with the regulatory organization where the occupational therapist is registered. With advances in technology, clients, occupational therapists, employers, and other stakeholders are seeking alternatives to in-person interactions. This can increase access to occupational therapy services and enables continuity of care when a client or therapist relocates. With the COVID-19 pandemic, the use of virtual services increased across Canada, making this change increasingly important to ensure access to occupational therapy services for clients in Ontario. <https://www.coto.org/news/news-details/2021/05/28/new-information-on-virtual-services> Registration Committee Policies In 2021 the Registration Committee reviewed all Registration policies for currency and relevancy, plain language and a diversity, equity, and inclusion lens. The revisions clarify expectations for applicants and registrants, enhance fairness, transparency, objectivity, and impartiality and are intended to ensure an equitable experience for all applicants/registrants. <https://www.coto.org/registrants/registration-services/policies>

Q3

New or consolidated class of certificates or licenses

No,

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

N/A

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Q4 Assessment of qualifications	No, Description of change/improvement that would impact fair registration outcomes: N/A
Q5 Timelines for registration, decisions and/or responses	No, Description of change/improvement that would impact fair registration outcomes: N/A
Q6 Registration and assessment fees	No, Description of change/improvement that would impact fair registration outcomes: N/A
Q7 Resources for applicants	Yes, Description of change/improvement that would impact fair registration outcomes: The College continually reviews and updates applicant resources and materials to ensure they are accurate, clear, and concise.
Q8 Changes to internal review or appeal process	No, Description of change/improvement that would impact fair registration outcomes: N/A
Q9 Access by applicants to their records	No, Description of change/improvement that would impact fair registration outcomes: N/A
Q10 Mutual recognition agreements	No, Description of change/improvement that would impact fair registration outcomes: N/A

Q11

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 and has had at least one internationally educated OT on the Registration Committee for the past six years. In March 2021, the Board approved a Board Competency Framework which addresses the need for professional, regional, age, cultural and gender diversity. In June 2021, the Board approved a Registration Committee Competency Framework (pg. 86) which requires that the Committee understand the process for becoming a health professional in Canada with foreign credentials, or ideally have experience in navigating that process.

Q12

Relationship with third party service provider(s)

No,

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

N/A

Q13

Accreditation of educational programs

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:

The College, through its work, nationally, with the other occupational therapy regulatory organizations in Canada, responded to a preliminary review of the governance processes for accreditation of occupational therapy programs in Canada.

Q14

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 will be implemented in 2023. This new system will also enable the College to more precisely track application data related to timelines.

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Q15

Anti-racism and inclusion-based policies and practices

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:

As noted above, in 2021 all College policies were updated with diversity, equity and inclusion lens. Changes included ensuring the currency requirement was applied in an equitable way during the application and renewal processes. For example, recognizing the registration process for internationally educated OTs often takes longer due to the assessment of education through SEAS. To accommodate for this, the College calculates the “date of application” by subtracting up to 12 months (based on the length of time the applicant spent in SEAS) from the date the applicant submits their complete application and pays their fee to the College. This is to ensure the currency of internationally educated OTs is not negatively impacted by completion of SEAS. In addition, the Suitability to Practise policy was updated to ensure that when reviewing past conduct issues (such as criminal charges) the Registration Committee considers whether applicant is a member of a group that has historically been subject to systemic discrimination.

Q16

Organizational structure

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

N/A

Q17

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 are brought forward to the Board for review on a quarterly basis.

Q18

Documentation requirements for registration

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

N/A

Q19

English / French language proficiency testing

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

N/A

Q20

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

- 1 **Review and update of all College registration policies to clarify expectations for applicants and registrants, enhance fairness, transparency, objectivity, and impartiality and are intended to ensure an equitable experience for all applicants/registrants.**
 - 2 **COTO collaborated nationally on harmonizing registration processes related to SEAS and labour mobility – with a goal of moving toward same regulatory history confirmation forms and refresher program framework**
 - 3 **COTO transition to electronic registrant/applicants’ files has enabled consistency and continuity for applicants.**
-

Q21

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 implementation of the agreement between COTO and SEAS to provide a reliable and valid process for assessment. Other mitigating activities include continuance of CAOT and SEAS (exam and assessments) in a virtual format to ensure timely registration of applicant continues as well as enabling applicants to complete assessments outside of Canada. 2021) |
| 2 | Delays in Canadian trained applicants completing program requirements due to pandemic - we have provisional certificate that allows applicants to work while waiting to write the National Occupational Therapy Certification Exam (NOTCE). |
| 3 | The closure of the gap filling program at McMaster University for internationally educated occupational therapists (IEOTs). The long-standing program folded at the end of 2021 and was the only program for IEOTS identified as needing upgrading or gap filling, through the SEAS program. (Through our work with our national occupational therapy regulatory organization (ACOTRO), we successfully launched a partnership with the University of Alberta in 2022 to develop a gap filling program for internationally educated occupational therapists. This program is delivered online and can be accessed by any applicant, from anywhere in the world. (time zones will impact convenience for any facilitated discussion type learning)) |

Q22

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,
Other (please specify):
N/A

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Q23

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,

Other (please specify):

N/A

Q24

Membership Data Demographics Data As of December 31, 2021, please indicate the number of members in each gender category identified below and the number of total members.

Total Male	587
Total Female	6138
Total Non-binary	4
Gender not provided	0
Overall Total	6729

Q25

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

No,

Other (please specify):

N/A

Q26

Do you collect other identity-based or demographics data?

Yes,

Other (please specify):

We collect data about indigenous identity.

Q27

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

Yes,

If yes, please indicate the type::

Working with other Colleges of OT across the country and CIHI to determine and promote consistency and continuity for applicants.

Q28

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	6475
Provisional/Limited	254
License/Certificate	
Emergency	0
License/Certificate	
All other classes	0
Overall Total	6729

Q29

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

Ontario	5556
Other Canadian Provinces and Territories	593
USA	185
Other Countries	395
Multiple and/or Unspecified Jurisdiction	0
Total	6729

Q30

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: 185
2	GBR: 95
3	IND: 90
4	AUS: 51
5	PHL: 41
6	HKG: 22
7	ZAF: 15
8	IRN: 15
9	PAK: 11
10	BRA: 8
11	ISR: 7
12	IRL: 6

Q31

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	43
Total Female	504
Total Non-binary	1
Gender not provided	0
Overall Total	548

Q32**No**

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

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Q33

Do you collect other identity-based or demographics data?

If yes, please indicate the type: _____ :

We collect data about indigenous identity.

Q34

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, 2021:

41

Q35

Please indicate the total number of applicants from Ontario who filed an application between January 1 and December 31, 2021 for the following categories as applicable.

Number of Applicants	547
Number of Applicants Licensed/Certified	524
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	0

Q36

Please indicate the total number of applicants from Canadian provinces and territories (excluding Ontario) who filed an application between January 1 and December 31, 2021 for each of the following categories as applicable.

Number of applicants	41
Number of applicants fully licensed/certified	41
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	0

Q37

Please indicate the total number of certificate-to-certificate (labour mobility) applicants who filed an application between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	13
Number of applicants fully licensed/certified	12
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	0

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Q38

Please indicate the total number of applicants from international jurisdictions (not including USA) who filed an application between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	21
Number of applicants fully licensed/certified	21
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	0

Q39

Please indicate the total number of applicants from multiple and/or jurisdictions not specified who filed an application between January 1 and December 31, 2021 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

Q40

Please indicate the total number of applicants from accredited Canadian post-secondary institutions who filed an application between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	380
Number of applicants fully licensed/certified	380
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	0

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Q41

Please indicate the total number of applicants who re-registered after withdrawing from the application process between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	18
Number of applicants fully licensed/certified	6
Average Time to Process Application in Weeks from First Point of Applicant Contact	15
Average Time to Process Application in Weeks from Receipt of all Required Documents	0

Q42

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

Our new system will allow us to track application processing data more precisely. (All data is captured in days – not business days)

Q43

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: 8
2	Australia: 7
3	USA: 7
4	India: 2
5	South Africa: 2
6	Philippines: 1
7	Iran: 1
8	N/A (there were only international applicants from 7 countries)
9	N/A
10	N/A
11	N/A
12	N/A

Q44

Processing Time As of December 31, 2021, how many full licenses/certificates did your organization issue?

561

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Q45		
Please indicate the total number of applicants who received full licensure/certification between January 1 and December 31, 2021, according to the following timelines.	0 – less than 3 months	476
	3 months – less than 6 months	59
	6 months – less than 12 months	19
	12 months – less than 18 months	6
	18 months – less than 24 months	1
	24 months and greater	0

Q46
Age of Active Applications As of December 31, 2021 what were the total number of active applications in your case inventory?

73

Q47		
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	30
	3 months – less than 6 months	14
	6 months – less than 12 months	20
	12 months – less than 18 months	3
	18 months – less than 24 months	6
	24 months and greater	0
	TOTAL	73

Q48		
Other Licenses/Certificates of Registration Processed Please 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, 2021). 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	4
	Other Canadian Provinces and Territories	8
	Certificate to Certificate (Labour Mobility)	0
	USA	0
	Other International	1
	Multiple and/or Unspecified Jurisdictions	0
	TOTAL	13

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Q49	Ontario	0
Other Licenses/Certificates of Registration Processed Please 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, 2021). 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.	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

Q50	Ontario	247
Other Licenses/Certificates of Registration Processed Please 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, 2021). 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.	Other Canadian Provinces and Territories	6
	Certificate to Certificate (Labour Mobility)	0
	USA	1
	Other International	3
	Multiple and/or Unspecified Jurisdictions	0
	TOTAL	257

Q51	Ontario	5
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, 2021). 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.	Other Canadian Provinces	1
	USA	0
	Other Countries	5
	Multiple and/or Unspecified Countries	0
	TOTAL	11

Q52	Ontario	0
State the number of reviews and appeals that your organization processed in the reporting year (January 1-December 31, 2021). 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.	Other Canadian Provinces	0
	USA	0
	Other Countries	0
	Multiple and/or Unspecified Countries	0
	TOTAL	0

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Q53		0
State the number of reviews and appeals heard in the reporting year (January 1-December 31, 2021). 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		0
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, 2021). 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

Q55
List the top three reason for appeals (by percentage) of a registration decision

1	N/A
2	N/A
3	N/A

Q56
List the top five reasons (by percentage) for not Issuing a License/Certification to Internationally Trained Individuals

1	Did not meet suitability to practise requirement .001%
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Q57
List the top Five Reasons (by percentage) for not Issuing a License/Certification to Canadian Graduates

1	Did not meet suitability to practise requirement .001%
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Q58
Please provide any additional comments you may have:

For questions 35, 36, 37, 38: Average Time to Process Application in Weeks from Receipt of all Required Documents - we do not track this information
