

# Fair Registration Practices Report

## Occupational Therapists (2009)

The answers that you submitted to OFC can be seen below.

This Fair Registration Practices Report was produced as required by:

- the Fair Access to Regulated Professions Act (FARPA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPA
- the Health Professions Procedural Code set out in Schedule 2 of the Regulated Health Professions Act (RHPA) s. 22.7 (1) and 22.9(1), for health colleges.

### Provision of Information About Registration Practices (1 / 13)

**Describe how you make information about registration practices available to individuals applying or intending to apply for registration. Specify the tools used to provide information, and the manner in which you make that information available, current, accurate and user friendly in each of these subcategories:**

#### a) steps to initiate the registration process

Information regarding how to apply, as well as the registration process and requirements are available on the COTO website and in paper form. This includes a Fact Sheet specifically for internationally educated applicants. This information is kept current and would be updated if the steps to initiate the registration process changed. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

Other organizations that want to provide information regarding COTO's registration process are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

The information is user-friendly as it is available both on-line and in paper format for those applicants who do not use or have access to the Internet. On the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read.

The same information as on the Fact Sheet is contained in a Career Map for the Occupational Therapy profession which was jointly developed with the Ministry of Citizenship and Immigration's Labour Market Integration Unit. This Career Map is available on the government of Ontario's website. When there are changes to COTO registration practices, COTO informs MCI so that changes can be made to this Career Map. It is also updated upon request by the Ontario government.

#### b) requirements for registration

Information regarding the registration process and requirements are available on the COTO website and in paper form as part of the application package sent out to potential applicants. This includes the Fact Sheet specifically for internationally educated applicants. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

This information is kept current by updating it whenever registration requirements change due to changes in the registration regulation or policy. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

The information is user-friendly as it is available both on-line and in paper format for those applicants who do not use or have access to the Internet. On the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read.

In addition, when applicants initiate the registration process, they are sent this information directly by paper or electronic mail.

The Career Map for the Occupational Therapy profession is also available on the government of Ontario's website. When there are changes to COTO registration practices, COTO informs MCI so that changes can be made to this Career Map. There are links to the COTO Fact Sheet and MCI Career Map from a number of Ontario government web pages.

A listing of the entry to practice requirements for registration as an occupational therapist in Ontario is also listed on the HealthForceOntario web site, along with a link to the COTO web site.

c) explanation of how the requirements for registration are to be met, such as the number of years of schooling required for a degree to be deemed equivalent to an Ontario undergraduate degree, length and type of work experience, credit hours or program content

Information regarding the ways that applicant can meet the registration requirements, including acceptable and required documentation is available on the COTO website and in paper form. This includes the Fact Sheet, which includes very detailed and specific information regarding how applicants may provide evidence to meet the requirements. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

This information is kept current by updating it when the ways in which individuals may meet the requirements changes. This could be due to changes in the registration regulation or policy. An example of this would be the acceptance of a new language fluency test or the change in the score required on such a test.

As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

The information is user-friendly as it is available both on-line and in paper format for those applicants who do not use or have access to the Internet. On the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read.

As indicated, the Career Map for the Occupational Therapy profession, available on the Ontario Ministry of Citizenship and Immigration's website, contains the same detailed information and MCI is advised when changes are made that may affect the accuracy of the content of the Career Map.

In addition, when applicants initiate the registration process, they are sent this information directly by paper or electronic mail as part of the registration package.

d) any education or practical experience required for registration that must be completed in Ontario or

## practice that must be supervised by a member of the profession who is registered in Ontario

There are no education or practice experiences that **must** be completed in Ontario for registration in the General Practising category.

However, if applicants are not current in practice, they may meet the currency requirement by practising under supervision in Ontario. Information regarding how to meet this requirement is provided on the website and in paper format. Also, once an applicant has applied for registration and found to not be current in practice, he/she is sent a letter of direction specifically outlining what he/she must do to meet the currency requirement. This is because the direction may vary depending on how long the individual has not practised.

If an applicant chooses to apply for a Provisional Practising Certificate of Registration, their practice under this category must be supervised by a College member. Information regarding this category of registration is available generally on the COTO website and in a specific pamphlet entitled "Provisional Practising Certificate of Registration - Responsibilities and Requirements".

This pamphlet and related documents are also available in paper form and they are provided directly in paper or electronic form to individual applicants seeking registration in this category. Information regarding Provisional practice is also included in the Fact Sheet/Career Map.

This information is kept current by updating it when there are any changes to the Currency requirements or to the Provisional Practising Certificate of Registration requirements. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

The information is user-friendly as it is available both on-line and in paper format for those applicants who do not use or have access to the Internet. On the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

## e) requirements that may be satisfied through acceptable alternatives

Not strictly applicable, though there are some requirements, such as currency and fluency that may be met in a number of ways and this is outlined in section 8.

This information is updated to be current and accurate when requirements or policies regarding acceptable evidence to meet the requirements changes.

The information is user-friendly as it is available both on-line and in paper format for those applicants who do not use or have access to the Internet. On the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements or documents required to meet the requirements.

## f) the steps in the assessment process

Information regarding the steps in the assessment of international credentials is available on the COTO website and in paper form; all of this information is included clearly in the Fact Sheet/Career Map. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

In addition, when applicants initiate the registration process, they are sent this information directly by paper or electronic mail. The information is user-friendly as it is available both on-line and in paper format for those applicants who do not use or have access to the Internet. On the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read.

This information is kept current by updating it when the ways in which applicant files are assessed changes. This could be due to changes in the registration regulation, policy or third-party service provision. As indicated above, other organizations that want to provide information regarding COTO's assessment processes are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

g) the documentation of qualifications that must accompany each application; indicate which documents, if any, are required only from internationally trained applicants

Information regarding the documentation required to complete the registration process is available on the COTO website and in paper form. The Fact Sheet/Career Map contains this information, also.

When applicants initiate the registration process, they are sent this information directly by paper or electronic mail. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

The language fluency requirement requires additional documentation from internationally educated applicants. An applicant may meet the requirement by:

1. Providing a signed declaration that his or her first language is English or French and confirming that he or she can speak and write English or French with reasonable fluency; or
2. Providing verification from the educational institution where his/her occupational therapy program was completed that the language of instruction was English or French; or
3. Providing evidence that she or he has achieved the minimum score indicated on one of the College approved language fluency tests

An applicant may request exemption from the Language Fluency Requirement. An applicant will only be granted an exemption if he/she can provide alternative objective evidence of fluency that the Registration Committee considers substantially equivalent to the requirements set out in the Fluency Policy, and the Committee is satisfied that granting such an exemption will not pose a risk to public safety or effective care. Evidence to be provided to the Committee may include:

- Documentation of the language tests and scores the applicant has achieved to date.
- Evidence of experience with verbal communication, validated by letters of support from third parties. For example, from occupational therapists, other health professionals, previous practice supervisors, previous clients/employers/ members of the public.
- Evidence of related health care employment where written documentation was required, validated by letters from third parties. For example, from occupational therapists, other health professionals, previous practice supervisors, previous clients/employers/ members of the public.
- Evidence of successful, functional communication as demonstrated and validated in a previous supervised practice experience (e.g. completed through a Refresher Program/Supervised Practice).
- Other evidence as presented by applicant.

The Language Fluency Requirement and Request for Exemption from the Language Fluency Requirement policies are both posted on the registration portion of the College's web site.

The educational program requirement requires additional documentation from internationally educated

applicants. An applicant may meet the requirement by providing satisfactory evidence of graduation from an approved OT program. This may include:

- A copy of original transcripts from educational institution where program completed; and
- Credential assessment report from WES or another credential assessment agency approved by the College.

#### h) acceptable alternatives to the documentation if applicants cannot obtain the required documentation for reasons beyond their control

All of COTO's registration policies are available for public viewing on the COTO web site, including the policy Insufficient and/or Inadequate Documentation (8-110). This policy clearly outlines the process of how applicants unable to provide adequate documentation may provide evidence to the Registration Committee to meet registration requirements and the decision criteria used by the Committee.

The information is user-friendly as applicants unable to provide required documentation are informed of and provided this policy information. It is also available on-line and on the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

This information is kept current by updating it when there are any changes to the policy (this was done most recently in May 2009). As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

#### i) how applicants can contact your organization

Applicants may contact the College by telephone or fax during normal business hours, and by e-mail and by regular (Canada Post) mail.

A Contact Us page on the COTO web site includes address, telephone, fax and e-mail contact information and a Staff Directory listing of contact information so that applicants may contact Registration staff directly. A number of government and other organizations provide a link to the COTO web site so that applicants will know where and how to contact the College.

When individuals apply to COTO they are also provided information regarding the staff person to contact directly regarding their own application.

This information is kept current by updating it when there are any staff or program changes at the College. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

The information is user-friendly as it is available on-line and on the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any questions they may have regarding communicating with the College.

j) how, why and how often your organization initiates communication with applicants about their applications

Communication is accomplished by telephone, email and/or written letter sent by Canada Post.

Applicants may be contacted at several points during the registration process, such as letters of acknowledgment, if clarification is required on their application, or if additional documentation is required.

International applicants are sent their letter of eligibility by Canada Post, or it may also be scanned and sent via email;

When a registration number is issued, the registrant is notified by email or phone, which is then followed by a letter.

Once registered, a new member package is sent to the registrant by Purolator courier. The package consists of a College letter, and 2 resource binders. These are usually shipped within 4-6 weeks from the date the registration certificate is issued.

Information regarding specific communications with applications, such as the timeframe within which they will receive a response to inquiries, how long assessments can be expected to take (and thereafter communicated to the applicant) are included in the registration information provided to applicants. Information regarding other communications that are part of the on-going processing of applicant files is not included, as these communications happen how and when they are required on an individual basis.

The information is user-friendly as it is also available on-line and on the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

This information is kept current by updating it when there are any changes. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

k) the process for dealing with documents provided in languages other than English or French

If an applicant's original documents are in a language other than English or French, they are required to provide, at their own expense, certified English translations of required documents.

This information is included in the Factsheet/Career map and in the registration information provided to applicants.

The information is user-friendly as it is available on-line and on the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

This information is kept current by updating it when there are any changes to this policy. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

l) the role of third-party organizations, such as qualification assessment agencies, organizations that

conduct examinations or institutions that provide bridging programs, that applicants may come into contact with during the registration process

Information regarding the roles of World Education Services (WES), other accredited credential assessment services and the Canadian Association of Occupational Therapists (CAOT), which sets and administers the national certification examination, are included in the Fact Sheet/Career Map.

The College has also posted information and links on its web site about projects to assist internationally educated occupational therapists (IEOTs). This includes the McMaster University Occupational Therapy Examination Preparation Program (OTepp).

The College has also provided a link to the pan-Canadian "Orientation to Canadian Health Care Systems, Culture and Context" course for internationally educated health professionals (offered through the University of Toronto) on its web site.

The information is user-friendly as it is available on-line and on the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding third-party service providers or courses/programs available to IEOTs.

This information is kept current by updating it when there are any changes regarding third-party service providers or additional bridging/preparatory programs or if these programs cease to be offered. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

m) any timelines, deadlines or time limits that applicants will be subject to during the registration process

An application is valid for one year from the date of application; an applicant who has not completed the process within this timeline must re-apply and pay the applicable fee again.

Applicants who are required to meet the currency requirement are provided six months to one year within which to meet the requirement. Once this requirement is met they are considered current for an 18-month period.

This information is conveyed to the applicants in written or e-mail correspondence sent to them during the registration process. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding the progress of their application.

This information is kept current by updating it when there are any changes to this policy. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

n) the amount of time that the registration process usually takes

When the College receives a completed application (meaning that all of the registration requirements have

been met) the processing time is usually one week. The College commits to processing such an application within 30 calendar days.

The information is available on the COTO web site and in information provided to the applicants when they apply. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any questions they may have regarding communicating with the College.

On the COTO web site, there is the option to increase the font size of text to make it easier for visually-impaired users to read.

This information is kept current by updating it when there are any changes to application processing times. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

The College has also included a section on the web site to give applicants an idea of how long certain processes will take in order to meet the registration requirements (e.g. a third party credential assessment).

**o) information about all fees associated with registration, such as fees for initial application, exams and exam rewrites, course enrolment or issuance of licence**

Information regarding the fees is available on the COTO website and in paper form. This information is also included on the application form. When applicants initiate the registration process, they are sent this information directly by paper or electronic mail.

The information is user-friendly as it is available both on-line and in paper format for those applicants who do not use or have access to the Internet. On the COTO web site there is also the option to increase the font size of text to make it easier for visually-impaired users to read. COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements.

This information is kept current by updating it when there are any changes to application fees. As indicated above, other organizations that want to provide information regarding COTO's registration practices are encouraged to provide a link to the COTO site rather than trying to reproduce the information on their site, as this way the information linked to will always be consistent and accurate.

**p) accommodation of applicants with special needs, such as visual impairment**

Requests for accommodation from applicants with special needs are handled based on the needs identified by the individual. While no information is publicly available, the few times that applicants have required accommodation to complete the registration process, College staff have been able to meet their needs on an individual basis.

The only specific accommodation provided is the option on the COTO web site there is the option to increase the font size of text to make it easier for visually-impaired users to read. However, COTO applicants may also speak or e-mail directly to COTO Registration staff regarding any of the registration requirements, and applicants would be able to have an in-person meeting with Registration staff if requested.

The service agreement between COTO and the CAOT includes the requirement to accommodate individuals with special needs, such as visual impairment, specific physical needs or religious requirements as part of the exam-writing process. The CAOT has policies regarding the provision of specific accommodations for applicants with special needs writing the examination and this information is provided on the CAOT web site or by calling the CAOT.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

The main changes in registration policies and practices in 2009 were:

- signing of a new Labour Mobility Support Agreement;
- the signing of a Memorandum of Understanding with the Canadian Association of Occupational Therapists (CAOT);
- the addition of a new policy regarding Insufficient and/or Inadequate Documentation;
- revisions of the policies regarding fluency and labour mobility;
- the revision of the Policy Handbook into a Policy Manual; and
- posting of the COTO registration policies on the public website.

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## Amount of Fees (2 / 13)

Are any of the fees different for internationally trained applicants? If yes, please explain.

Application, registration and examination fees are the same for all applicants.

However, only internationally educated applicants would normally be required to pay for an Academic Equivalency Review or an External Credential Assessment.

The fees associated with these are \$150 + GST for the Academic Equivalency Review and approximately \$115. + GST for a third-party credential assessment report (the fee may vary depending on the assessment service provider used).

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

No changes have occurred in 2009.

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## Provision of Timely Decisions, Responses and Reasons (3 / 13)

a) What are your timelines for making registration decisions?

Once all documents are received and a decision is made, the College communicates with applicants verbally as soon as possible (usually within one week of the Registration Committee decision). The decision is formally communicated to the applicant in writing within 30 calendar days.

b) What are your timelines for responding to applicants in writing?

Written responses to applicants are provided within 30 calendar days.

c) What are your timelines for providing written reasons to applicants about all registration decisions, internal reviews and appeal decisions?

Reasons for registration decisions are provided in writing within 30 calendar days of the date of the decision.

d) Explain how your organization ensures that it adheres to these timelines.

As the College receives relatively few applications that need to go to Registration Committee, deadline dates for responses are tracked manually and the deadlines are rarely exceeded.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

There have been no changes in 2009.

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## Access to Records (4 / 13)

a) Describe how you give applicants access to their own records related to their applications for registration.

All formal decisions issued by the Registration Committee are mailed to the applicant. If an applicant requests their original documents back, they are mailed by Canada Post. If the file is substantial and requires many pages to be photocopied, the applicant will be charged a fee.

b) Explain why access to applicants' own records would be limited or refused.

The College would limit or refuse access to documents if the College has been informed that the documents are fraudulent.

c) State how and when you give applicants estimates of the fees for making records available.

Upon request and review of the volume of the documents requested, the College would determine if a fee was required for photocopying and shipping. Applicants would be advised of any costs related to photocopying and shipping before the request would be processed. The processing would only be undertaken if the applicant agreed to pay related costs.

d) List the fees for making records available.

The College has not established a fee schedule as the number of documents are usually limited in pages and a fee would not be necessary. However, if the volume was excessive, i.e. some curricula (program descriptions) are several hundred pages long, a reasonable fee for photocopying (and shipping, if applicable) would be charged. Applicants would be advised of any costs related to photocopying and shipping before the request would be processed. The processing would only be undertaken if the applicant agreed to pay related costs.

e) Describe the circumstances under which payment of the fees for making records available would be waived or would have been waived.

The College has not established a policy regarding this, but if the applicant is only requesting a few pages, then a fee is not charged.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

There have been no changes in 2009.

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## Resources for Applicants (5 / 13)

a) List and describe any resources that are available to applicants, such as application guides, exam blueprints or programs for orientation to the profession.

As indicated in a previous section, the College makes available a number of documents, including a Fact Sheet/Career Map for Internationally Educated Applicants as well as a Form Guide to the COTO Registration Application Form.

The Canadian Association of Occupational Therapists has developed and makes available several documents specifically designed to provide information to internationally educated applicants as well as for Canadian graduates preparing to attempt the National Occupational Therapy Certification Examination (NOTCE). This includes "CAOT: Requirements for Occupational Therapy Practice in Canada", the "Certification Examination for Occupational Therapists Resource Manual" and the "Exam Procedures Manual".

There are a couple of preparatory/orientation programs for internationally educated OTs. The OT Exam Preparation Program (OTepp) is offered at McMaster University and has received funding to continue programming until 2012.

The pan-Canadian "Orientation to Canadian Health Care Systems, Culture and Context" course for internationally educated health professionals (offered through University of Toronto) is also a course available to IEOTs.

HealthForceOntario (HFO) also provides information and counselling for internationally educated health professionals in a number of disciplines, including occupational therapy.

b) Describe how your organization provides information to applicants about these resources.

The Fact Sheet/Career Map lists contact information for WES, CAOT, the Ontario Society of Occupational Therapists, HealthForceOntario, settlement.org and the Ontario Council of Agencies Serving Immigrants (OCASI) and is available on-line and provided in paper format to IEOT applicants.

On the College web site, a link to the CAOT web site is provided. Also, in all registration materials, it is made clear that CAOT is the exam provider and that all information regarding the exam may be found by contacting the CAOT.

The College web site also provides links to: OTepp, the "Orientation to Canadian Health Care Systems, Culture and Context" course for internationally educated health professionals and the HFO.

COTO has, in cooperation with HFO, held information sessions for IEOTs that provide information about the registration processes in Ontario and also introduce IEOTs to available HFO services.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

In 2009 a Memorandum of Understanding (MOU) was signed with the Canadian Association of Occupational Therapists. This MOU outlines the service relationship between COTO and the CAOT and details the services to applicants to be provided by CAOT and the fairness obligations of the CAOT as a third-party service

provider.

The collaboration with HFO to provide IEOT information sessions was also new in 2009.

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### Internal Review or Appeal Processes (6 / 13)

In this section, describe your internal review or appeal process. Some regulatory bodies use these two terms (*internal review* and *appeal*) for two different processes, some use only one of these terms, and some use them interchangeably. Please use the term that applies to your profession. If you use both terms (for two different processes), please address both.

a) List your timelines for completing internal reviews or appeals of registration decisions.

Not applicable.

There is no formal internal review or appeal process. However, applicants may be asked or may wish to provide further information/documentation to assist the Registration Committee in its decision-making. Applicants providing additional information or documentation in this way may have their file reviewed at the next available Registration Committee meeting.

Reviews and appeals of registration decisions must be made to the Health Professions Appeal and Review Board (HPARB), an adjudicative body mandated under the RHPA.

i. State the number of internal reviews or appeals of registration decisions that exceeded your timelines.

Not applicable. Please see a) above.

ii. Among internal reviews or appeals that exceeded your timelines, state the number that were from internationally trained applicants.

Not applicable. Please see a) above.

b) Specify the opportunities you provide for applicants to make submissions regarding internal reviews or appeals.

Not applicable. Please see a) above.

c) Explain how you inform applicants about the form in which they must make their submissions (i.e., orally, in writing or by electronic means) for internal reviews or appeals.

Applicants must provide any information to be considered by the Committee in written form; they may submit documents electronically or by Canada Post. Some documents, such as course descriptions etc. must be submitted directly from the issuing institution to the College. All of this information is included in the registration guidelines provided to applicants.

d) State how you ensure that no one who acted as a decision-maker in a registration decision acts as a decision-maker in an internal review or appeal of the same registration decision.

Not applicable, as there is no formal internal review or appeal process.

e) Describe your internal review or appeal process.

Not applicable. Please see a) above.

Any applicant who wishes to appeal a decision of the Registration Committee may do so by contacting the Health Professions Appeal and Review Board (HPARB).

f) State the composition of the committee that makes decisions about registration, which may be called a Registration Committee or Appeals Committee: how many members does the committee have; how many committee members are members of the profession in Ontario; and how many committee members are internationally trained members of the profession in Ontario.

The COTO Registration Committee is a statutory committee created under the Regulated Health Professions Act.

The Registration Committee consists of:

- a) two members of the Council who are members of the College;
- b) two members of the Council appointed to the Council by the Lieutenant Governor in Council; and
- c) one College registrant who is not a member of Council.

There are no set-aside Committee positions for internationally educated members. Such members are eligible to become Council members in the same way as any other member, and may in that way become Registration Committee members.

A Registration Panel must be composed of at least three persons from the Registration Committee, one of whom is a member of Council appointed by the Lieutenant Governor in Council. On each panel, the number of Council members who are members of the College must equal or exceed the number of Council members appointed by the Lieutenant Governor in Council.

The Chair of the Committee is elected annually by the Council.

The Registration Committee meets at least ten times per year.

The Chair of the Committee reports regularly to the Council and prepares an annual written report for Council and registrants.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

There were no changes in 2009.

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### **Information on Appeal Rights (7 / 13)**

This section refers to reviews or appeals that are available after an internal review or appeal. Describe how you inform applicants of any rights they have to request a further review of or appeal from a decision.

All applicants who receive a registration decision are informed, in their decision letter, of their right to appeal to the Health Professions Appeal and Review Board (HPARB). In this letter they are advised that if they wish a review or hearing, they must write to both the HPARB and to the COTO Registration Committee within 30 days of receiving the decision letter, specifying whether a review or hearing is required.

The appeal process is also outlined in the Fact Sheet / Career Map available on our website.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

There were no changes in 2009.

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### **Assessment of Qualifications (8 / 13)**

This category covers your processes for assessing all qualifications, such as academic credentials, competencies, language ability or practical experience.

a) List the criteria that must be met in order for an applicant's qualifications to satisfy the entry-to-practice requirements for your profession.

The General Practising Certificate requirements are:

1. A Bachelor of Science degree in Occupational Therapy obtained in Ontario or an academic qualification considered equivalent by the Registration Committee.
2. Successful completion of 1000 hours of fieldwork or clinical practicum as part of the education program.
3. Currency/recent practice hours (750 hours within the last 3 years or 1550 hours within the last 5 years) or have successfully completed a supervised Refresher Program within the last 18 months. Recent graduates (18 months or less) are automatically granted currency. Practice hours include direct service hours, planning and development hours, and administrative hours usually recognized in standard workload measurement systems. Applicants who do not meet currency must provide other evidence, satisfactory to the Registrar, of possessing the current knowledge, skill, judgment and ability.
4. Successful completion of the certification examination (currently the Canadian Association of Occupational Therapists' National Certification Exam is the approved exam).
5. Professional Liability insurance that includes a sexual abuse therapy and counseling fund endorsement.
6. Legal entitlement to work in Canada
7. Fluency in French or English

b) Describe the methodology used to determine whether a program completed outside of Canada satisfies the requirements for registration.

Applicants who completed their OT program outside of Canada are required to provide an academic assessment report from a credential agency approved by the College.

The College maintains a database of OT programs outside of Canada that have previously been assessed and been approved by the College. If the credential assessment report verifies the documented completion of an OT program and this program is one that has been previously approved by the College, the applicant will be deemed to have completed an approved program.

If the program completed is verified to be a legitimate OT program, but it has not yet been approved by the College, the next step is for the applicant to ask for an Academic Equivalency Review (AER) of their program by the College's Registration Committee.

The applicant is required to provide the College with their transcript along with valid course descriptions including the names, content, hour breakdown of the courses in the program, and details of the clinical fieldwork placements.

An Academic Equivalency Review must be completed for applicants that have graduated from an OT program that has not been approved by the College. An OT program will be approved by the College when the program is found to be substantially equivalent to Ontario-approved OT programs at a bachelors level.

#### PROCEDURE

An AER is completed by a panel of the Registration Committee. The Registration Committee uses a standardized review tool to determine program equivalency.

The current standardized tool is the Academic Review Tool, 2008 (ART). The ART determines substantial equivalence based on the evidence provided in course curriculum in comparison to the "Essential Competencies of Practice for Occupational Therapists in Canada" 2nd Edition, (2003).

For the AER to be completed, the following process is followed:

1. Applicant is provided with the paper ART document (an electronic copy is provided on request);
2. Applicant must arrange for their academic institution to issue the complete Course Description and/or syllabus (representative of the years they studied) to the College and to themselves;
3. All academic documents must be provided in English or French. Documents in any other language will require translation into English at the expense of the applicant. Only notarized translated documents will be accepted;
4. The applicant must complete the ART based on their review of the curriculum and submit this to the College for review by the Registration Committee;
5. The Registration Committee will review the applicant's submission at its first available meeting, and corroborate the findings based on the applicant's transcript and course description;
6. Upon completing the review, the Registration Committee will make a decision as to the substantial equivalency of the OT program.

c) Explain how work experience in the profession is assessed.

One of the requirements of registration is that the applicant be current in practice. Applicants may meet this requirement by providing evidence that they have recent practice experience in the profession (750 hours within the last 3 years or 1,550 hours within the last 5 years) or have successfully completed a supervised Refresher Program within the last 18 months. Recent graduates (18 months or less) are automatically granted currency. Practice hours include direct service hours, planning and development hours, and administrative hours usually recognized in standard workload measurement systems.

Applicants self-declare their practice hours and give signed permission for the College to verify this information. They may also provide signed documentation from employers as evidence of recent practice hours. This practice may have been completed in any country.

Applicants who do not meet currency must provide other evidence, satisfactory to the Registrar, of possessing the current knowledge, skill, judgment and ability. This could include evidence that they have been engaged in continuing education or professional development or that they have completed a refresher program approved by the College.

d) Describe how your organization ensures that information used in the assessment about educational systems and credentials of applicants from outside Canada is current and accurate.

The College requirement of a third party credential assessment is to ensure the authenticity and validity of academic documents and credentials.

WES, as a member of the Alliance of Credential Evaluation Services of Canada and a service endorsed by the Ontario government, has undergone a rigorous self-evaluation process including a review of assessment procedures, experience, file management, personnel qualifications, documentation methods and reference material base. To qualify for Alliance membership, WES has demonstrated that it complies with established quality standards and has agreed to maintain those standards.

WES uses a sophisticated database to store all information about educational institutions, and previous assessment decisions. WES staff, including dedicated researchers, is continuously updating information on changes to education systems around the world. Evaluation team members meet weekly to discuss new information and the policy group meets weekly to ensure new information informs decisions regarding evaluations.

COTO: The Academic Review Tool used to determine substantial equivalency of OT programs is based on the

national document "Essential Competencies of Practice for Occupational Therapists in Canada" 2003 2nd edition'. This document is kept current by the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO).

e) Describe how previous assessment decisions are used to assist in maintaining consistency when assessing credentials of applicants from the same jurisdictions or institutions.

WES: WES stores all previous decisions, and updates to policy, in a database which is used by evaluators to prepare evaluation reports.

COTO: The College maintains a database of previous assessments of OT programs completed outside of Canada and uses this as reference when determining whether an OT program is approved by the College or requires an Academic Equivalency Review (AER). Once an AER is done a program may be added to the list of approved programs. Subsequent applicants who completed the same program will not be required to complete the AER as long as the program has not changed since it was approved by the College.

f) Explain how the status of an institution in its home country affects recognition of the credentials of applicants by your organization.

WES takes this in consideration as one factor in credential assessment. Some institutions which are not accredited in their home country are bona fide. There are also instances (rare) where a country may accredit institutions inappropriately.

The College relies on the WES assessment to determine whether a program should be recognized or not.

g) Describe how your organization accommodates applicants with special needs, such as visual impairment.

The only specific accommodation available is the option to increase the font size on the COTO website. However, when such needs are identified the College makes every effort to accommodate them on an individual basis. For example, the College consults with the applicant to determine what their needs are and how best to meet them, such as meeting the applicant in person to verbally explain requirements.

The service agreement between COTO and the CAOT includes the requirement to accommodate individuals with special needs, such as visual impairment, specific physical needs or religious requirements as part of the exam-writing process. The CAOT has policies regarding the provision of specific accommodations for applicants with special needs writing the examination and this information is provided on the CAOT web site.

h) State the average length of time required to complete the entire registration process, from when the process is initiated to when a registration decision is issued.

The answer to this question depends on whether or not an applicant meets all of the registration requirements in order to be issued a certificate of registration.

A complete application takes 5 days to process. An incomplete application can take up to several months to

process depending on when the applicant fulfills all requirements and sends the documentation to the College to support their application.

An incomplete application can be a result of:

Also, if the education program has not yet been approved by the College, the application will be referred for an Academic Equivalency Review. This review can add 3 months or more to the processing time. It can take some time for the applicant to complete the Academic Review Tool and for supporting documents to be sent from international institutions to the College. If the applicant does not meet the currency requirement, he or she may be required to complete an approved re-entry program which is usually a period of supervised practice. The applicant is provided 12 months to meet this requirement.

- the applicant not having submitted all required supporting documentation;
- the applicant submitting the registration application prior to having met all of the registration requirements (e.g. fluency requirement, legal authorization to work in Canada);
- the applicant having submitted documentation that may be insufficient or unclear and must be referred to the Registration Committee for review.

i. State whether the average time differs for internationally trained individuals.

Yes, the average time for internationally trained individuals can take longer.

ii. If the average time differs for internationally trained individuals, state whether it is greater or less than the average for all applicants, and the reasons for the difference.

Internationally educated applicants have at least one extra step in the registration process – they are required to obtain a third party credential assessment. The College has approved all Canadian Occupational Therapy programs, therefore Canadian educational programs do not require a third party credential assessment. Also many applicants must provide evidence of language fluency through completion of a standardized test, and some require additional language training to be able to meet this requirement. Therefore, the time required to fulfill these requirements may result in the process taking longer.

Other factors that may slow down the process include: the time required for third parties (schools, former employers, regulatory bodies in other countries) to provide official documentation such as original transcripts and curricula, official confirmation or documentation of OT licensure/registration in other jurisdictions, and the time it takes to obtain a work permit or permanent resident status from Citizenship and Immigration Canada.

i) If your organization conducts credential assessments:

i. Explain how you determine the level (e.g., baccalaureate, master's, Ph.D.) of the credential presented for assessment.

Not applicable. The College uses the services of a third-party credential assessment service, World Education Services (WES), to determine the level of international program completed.

ii. Describe the criteria that are applied to determine equivalency.

The College uses the services of a third-party credential assessment service - World Education Services (WES) to conduct credential assessments.

In addition, if the applicant's OT program has not been previously approved by the College an Academic Equivalency Review (AER) must be completed. This process is described in section b) above.

iii. Explain how work experience is taken into account.

Not applicable - work experience is not considered part of the credential assessment process.

j) If your organization conducts competency assessment:

i. Describe the methodology used to evaluate competency.

Not applicable - there is no competency assessment process available.

ii. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

Not applicable - there is no competency assessment process available.

iii. Explain how work experience is used in the assessment of competency.

Not applicable - there is no competency assessment process available.

k) If your organization conducts prior learning assessment:

i. Describe the methodology used to evaluate prior learning.

Not applicable - there is no PLA process available.

ii. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

Not applicable - there is no PLA process available.

iii. Explain how work experience is used in the assessment of prior learning.

Not applicable - there is no PLA process available.

I) If your organization administers examinations:

i. Describe the exam format, scoring method and number of rewrites permitted.

Not applicable - a third-party, the Canadian Association of Occupational Therapists (CAOT) sets and administers the exam. Please see section 9.

ii. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

Not applicable - the CAOT sets and administers the exam. Please see section 9.

iii. State how often exam questions are updated and the process for doing so.

Not applicable - the CAOT sets and administers the exam. Please see section 9.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

The only change that has occurred in 2009 is a change to the Currency requirement that only applies to OTs registered in other Canadian jurisdictions and applying to come to Ontario under the auspices of the Labour Mobility Support Agreement. This would not affect IEOTs making their initial application to be registered in Canada in Ontario.

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### **Third-Party Organizations (9 / 13)**

a) List any third-party organizations (such as language testers, credential assessors or examiners) relied upon by your organization to make assessment decisions.

The Canadian Association of Occupational Therapists (CAOT) sets and administers the National Occupational Therapy Certification Examination (NOTCE), which is currently the only examination accepted to meet the examination requirement.

World Education Services (WES) Canada provides credential assessment services for the College.

The College accepts language fluency assessments from a number of accredited language fluency testing agencies; Test of English as a Foreign Language (TOEFL); Michigan English Language Assessment Battery (MELAB); International English Language Testing System (IELTS); TestCan etc. The College does not have formal service provision agreements with these organizations.

b) Explain what measures your organization takes to ensure that any third-party organization that it relies upon to make an assessment:

i. provides information about assessment practices to applicants

COTO has service provider Memoranda of Understanding with both CAOT and WES that outline the fairness and transparency obligations of these parties as they provide services to COTO applicants.

The College directs applicants to the CAOT for all information regarding the National Occupational Therapy Certification Examination (NOTCE).

The CAOT website provides extensive information specifically for internationally educated occupational therapists (IEOTs). This includes information regarding the role of provincial regulatory bodies in the credential assessment and registration process.

The CAOT, as a national organization, does perform credential assessments on behalf of some OT regulatory bodies in other Canadian provinces, in order to determine examination eligibility. The CAOT does not perform credential assessment for COTO and directs applicants hoping to work in Ontario to COTO to begin their credential assessment process.

Applicants applying to be registered in Ontario must go through the COTO credential assessment process in order to determine whether they have met the education requirement of registration.

CAOT provides information outlining the complete examination process on their website and in the cover letter and application form provided to the applicant (all material is available in English and French).

WES: The College directs applicants to WES for credential assessment services. There is information on the WES website regarding how to apply for a credential assessment, the documentation required etc. In addition WES participates in community information sessions, walk-in support, e-mail response to individual queries, telephone response to individual queries etc.

ii. utilizes current and accurate information about qualifications from outside Canada

CAOT is not used by COTO to assess qualifications and the exam process is unrelated to this issue.

WES is a recognized and accredited credential assessment service and has a signed Memorandum of Understanding with the College that stipulates that WES adheres to the transparency, good practices and quality assurance guidelines of the Alliance of Credential Evaluation Services of Canada (ACESC). ADESC quality assurance guidelines includes the use of current and accurate information about qualifications completed outside of Canada.

### iii. provides timely decisions, responses and reasons to applicants

CAOT: Not applicable - COTO does not use CAOT services to assess international programs (see i. above).

WES: All required documents, and payment in full must be received before the assessment of the credentials can begin. At this point, the process takes seven working days, after which a report is sent to the applicant, and to an institution or employer of the applicant's choice.

Late is defined as taking 8 or more business days, excluding the time waiting.

Based on when the file is first opened, the average length of time is 5 to 7 days; based on when WES receives all required documents. The average length of time is 5 days. This is consistent with WES' 7 business day standard, because 2-3 business days would be taken in processing the file up to the time that a request for appropriate documents was sent out. At this point, the number of working days on the file is frozen until the required documents are received.

Appeals are responded to within 20 working days. The individual is informed of the timeframe when they make an appeal.

### iv. provides training to individuals assessing qualifications

CAOT: Not applicable - COTO does not use CAOT services to assess international programs (see i. above).

WES: All new evaluation staff receive formal in-house training under the leadership of the Assistant Director, Training. Typically an individual works under the direct supervision of a senior staff for two months prior to working on their own.

All evaluation staff participate in weekly meeting to ensure they are up to date on emerging trends and information.

### v. provides access to records related to the assessment to applicants

CAOT: Not applicable - COTO does not use CAOT services to assess international programs (see i. above).

WES: WES's privacy policy contains details about access to information in an applicant's file. This policy is available on the WES website.

Here is the WES Privacy Policy:

#### 1. What Information Does WES Collect?

##### a. Application Information

The WES Application requires personal information such as mailing address, institutions attended, etc. Such information is used for the purpose of evaluation, and may be shared with the designated recipient(s) of the evaluation and the institution(s) listed on the application.

##### b. Evaluation Information

In order to evaluate your credentials, WES collects personal information directly from educational institutions and other parties.

### c. E-mail Information

If you choose to provide an e-mail address, WES will correspond with you via e-mail and will retain the content of your e-mail messages together with your e-mail address and WES's responses.

### d. Cookies

For the improvement of our Web materials and client services, the WES Website makes use of cookies, which automatically collect anonymous user data (user traffic patterns, server activity, etc.). A cookie is a small text file containing a unique identification number that is transferred from a Website to the hard drive of your computer, allowing the site administrator to identify your computer and passively track its activities on the Website.

We may use cookies to temporarily store some personal information, such as to save your password, so you don't have to re-enter it each time you visit our site. Cookies, by themselves, cannot be used to disclose your individual identity. This personal information identifies your browser, but not you, to our servers when you visit our site. Most browsers are initially set up to accept cookies, but you can set your browsers to refuse cookies. However, if you do not accept cookies, you may be limited in some areas of the WES Web sites.

## 2. How does WES store information we collect?

Once you have submitted an application to WES, by whatever means, the information in the application form, and images of the documents you have submitted for evaluation are stored in our electronic database.

If you contact WES following your application, copies of your correspondence will also be stored in your file.

Only members of WES staff that are authorized users, using a password, can access the data stored in the WES server.

Backup copies of the data are stored off site in secure locations. We may use the services of third parties for such storage, but we ensure that your personal information is protected at least as well as it is protected by WES, as described in this Policy.

All paper files in the WES office are kept in locked filing cabinets.

## 3. How Does WES Use the Provided Information?

WES uses personal information solely for the purpose of evaluation. WES reserves the right to contact both the recipients of the evaluation and the academic institutions that the applicant has attended to request further information on programs of study, verification of documents, etc.

## 4. How Does WES Secure Information Transmissions?

The WES on-line application form uses a secure server, which protects your data from being observed in transmission by a third party.

## 5. Does WES Disclose Information to Outside Parties?

WES does not sell or distribute its client lists to any outside party. WES may provide aggregate information about our applicants, services selected, and Website information to affiliate organizations, but such aggregate information will not include personally identifying data, except as otherwise provided in this Privacy Policy.

In order to evaluate your credentials, WES may disclose personal information we collect about you to educational institutions and other parties we deem necessary. WES discloses the results of your report to the recipients that you request on your application. In the event that any document submitted with an application is found to have been altered, forged or tampered in any manner, the documents will be retained by WES and WES will notify all recipients indicated on your application, as well as the appropriate authorities. We may also

disclose your personal information if required or permitted by law. WES will not otherwise release copies of your report to any parties without your written instructions.

#### 6. Does WES ever destroy the information that it collects from applicants?

Yes, WES will destroy the paper copies of its files, subject to any limitations that may be required by law. Original documents received by WES directly from applicants will be returned to them via registered mail. Originals received directly from academic institutions are the property of WES.

The electronic files, which include images of documents, are kept indefinitely, in order to facilitate future requests for additional copies of evaluation reports.

#### 7. Your Consent

By using the WES Website, or by submitting an application in fax or in person, you consent to the terms stated in this Privacy Policy. You also consent to the collection, use and disclosure of your personal information as disclosed in this Policy.

#### 8. Access to Information

You have the right to request information that WES has collected and stored about you. If there are errors in the information in your files, you may request that it be changed.

In order to access this information, you must put your request in writing to the individual referred to below. Please allow four weeks for a response.

Information relating to the verification of documents may be excluded from this access. We may also be prohibited by law from disclosing certain information to you.

#### 9. Questions

Although numerous individuals within WES are responsible for the day-to-day collection and processing of personal information, WES has a designated Privacy Officer who is ultimately accountable for the handling of all personal information under the control of WES. The Privacy Officer is also responsible for ensuring that the principles set out in this Privacy Policy are being complied with. If you wish to challenge our compliance with this policy, if you wish to request access to your personal information, or if you have questions about this Privacy Policy, please contact our Privacy Officer as follows:

e-mail: [CanadaPrivacy@wes.org](mailto:CanadaPrivacy@wes.org)  
Privacy Officer  
World Education Services  
45 Charles Street East, Suite 700  
Toronto, ON M4Y 1S2  
Canada

#### vi. accommodates applicants with special needs, such as visual impairment

CAOT: Not applicable - COTO does not use CAOT services to assess international programs (see i. above).

WES: Applicants may be accommodated on an individual basis, based on identified needs. For example, a WES customer services staff could meet with a visually-impaired applicant who needed a verbal explanation of the process and/or their assessment.

c) If your organization relies on a third party to conduct credential assessments:

i. Explain how the third party determines the level (e.g., baccalaureate, master's, Ph.D.) of the credential presented for assessment.

CAOT: Not applicable - COTO does not use CAOT services to assess international programs (see i. above).

WES: The main elements that are considered are the level, scope and intent of the degree in the home country. For example, what is the status of the institution, what are the admission requirements of the program, what is length and depth of the program, what does the degree lead to (e.g. further study, licensing, etc).

For BAs, there is a definition of institution type (academic versus technical, university versus community college type of institution), program type and program length that is factored into the decision as to whether the credential is a university bachelors degree, or a community college diploma. Furthermore, if the degree is comparable to a three- or four-year bachelors depends on the relative standing of the academic institution in the home country.

ii. Describe the criteria that are applied to determine equivalency.

CAOT: Not applicable - COTO does not use CAOT services to assess international programs.

WES: WES provides an assessment of the level of a program as well as verifications that the documents are genuine, that it is an approved program at that institution etc.

WES does not evaluate the content of the program for the College.

iii. Explain how work experience is taken into account.

While some college or university programs may require clinical placements or internships, this would be considered as part of the academic program. Work experience outside of the post-secondary academic program is not part of the credential assessment process.

d) If your organization relies on a third party to conduct competency assessments:

i. Describe the methodology used to evaluate competency.

Not applicable - COTO does not use a competency assessment process.

ii. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

Not applicable - COTO does not use a competency assessment process.

iii. Explain how work experience is used in the assessment of competency.

Not applicable - COTO does not use a competency assessment process.

e) If your organization relies on a third party to conduct prior learning assessments:

i. Describe the methodology used to evaluate prior learning.

Not applicable - COTO does not use a PLA process.

ii. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

Not applicable - COTO does not use a PLA process.

iii. Explain how work experience is used in the assessment of prior learning.

Not applicable - COTO does not use a PLA process.

f ) If your organization relies on a third party to administer examinations:

i. Describe the exam format, scoring method and number of rewrites permitted.

National Occupational Therapy Certification Examination (NOTCE):

Regarding the National Occupational Therapy Certification Examination (NOTCE), candidates may speak with the CAOT Exam Services Coordinator during CAOT business hours to receive a verbal explanation of the process or to clarify questions the candidate may have.

In terms of writing the NOTCE, at no cost to the candidate, and at the candidate's request based on supporting documentation from a professional or the candidate's university student services office, CAOT provides a variety of special accommodations that are required by the candidate such as additional time, private space, reader/scribe, Braille or large print exam, physical accommodation (chair with additional back support, special desk, etc.) or non-Saturday sitting based on religious restriction.

The NOTCE is offered twice a year: in July and November.

The exam consists of two 2-hour sessions with a one hour break between. Each session covers 100 multiple-choice questions based on case studies provided in point form, in Plain English or French.

Scoring is based on standardized scores with a mean, or average, of 500 and a standard deviation of 100. For each of the Basic and Professional Content areas and for the Total exam, the average score (number of items answered correctly) for all the first-time Canadian Trained candidates is set to a standard score of 500.

Failed candidates are provided with Fail Score sheets indicating the distribution of items, the performance of the reference (first-time Canadian trained) group and the performance of the individual, all expressed in percentages.

The passing score for the examination is 290. The passing score for the exam was determined by subject matter experts who reviewed the content of an examination and rendered judgments on expected candidate performance item by item. This reflects the purposes of the exam, which is to ensure that all individuals who enter occupational therapy practice in Canada meet a minimum standard of theoretical and applied knowledge and professional behaviour.

The passing score, which is a standardized score of 290, has been maintained from one exam administration to the next through a statistical procedure known as equating which ensures that the level of performance necessary to pass one exam is equivalent to the level of performance required to pass another exam, despite differences in length or difficulty.

An eligible applicant may write the examination an unlimited number of times.

However, if an individual holds COTO Provisional registration, he/she is afforded a maximum of two opportunities to write the NOTCE while holding a Provisional Certificate and practising under supervision. If the Provisional member is unsuccessful after two attempts, his/her Provisional registration will expire. At that point, the individual will no longer be allowed to practice as an occupational therapist, but may again attempt the examination an unlimited number of times as an applicant.

All those who write the exam are notified of their status (pass/fail) within approximately 6 to 8 weeks of the exam sitting. Those who do not pass the NOTCE are given a detailed description of their examination results.

ii. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

In terms of the administration of the NOTCE, CAOT currently uses the services of the Division of Studies of Medical Education, University of Alberta, as an external examination services provider. Both validity and reliability scores are provided by DSME for each examination administration.

Validity and Test Blueprint: The NOTCE has an exam Blueprint that is used to ascertain content validity for each examination. After each examination sitting there is a report that outlines the different components of the Blueprint elements, the recommended emphasis (expressed as percent range, e.g., 20-30% for Professional Knowledge), the marginal totals and accompanying percentages showing the emphasis given to the areas on the exam.

The actual distribution of scored items by subject areas are reviewed after each sitting to ensure that the exam is representative of the content of Occupational Therapy, within the constraints of the description of the domain, the test format, and the test blueprint.

Test Reliability: CAOT uses an accepted measure of reliability which represents a measure of the internal consistency of the examination. CAOT examination reliability values are in keeping with the reliability generally expected for licensing examinations. Each item of each examination sitting is examined for its reliability. According to reliability measures items may be removed before scoring and then be reviewed, revised, or discarded by the Certification Examination Committee.

iii. State how often exam questions are updated and the process for doing so.

The NOTCE is continuously under review and revision to reflect current practice and relevant professional documents. The Registrar of COTO is the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) representative on the Exam Review Committee. Exam items are developed according to Item Generation Policy. In 2009 a full review of the NOTCE was undertaken and completed.

All Item Generators receive training. Items are reviewed and revised by the Item Generation Coordinator, and then brought to the Certification Exam Committee after translation into plain language in each official language. Each exam item is reviewed again and revised as needed before being accepted into the bank.

Once material is accepted into the exam bank, it is reviewed for currency each time it is used on an exam, or as per policy. All case studies and items are coded according to the blueprint and referenced.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

In 2009 an MOU was signed between COTO and the CAOT, formalizing their third-party service provision agreement.

The Registrar of COTO has become the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) representative on the CAOT Exam Review Committee.

In 2009 a full review of the NOTCE was undertaken and completed.

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## Training (10 / 13)

a) Describe the training that your organization provides to:

i. individuals who assess qualifications

All members of the COTO Registration Committee (including new and experienced members) are provided with an annual orientation session to the work of the Committee. The main resource for this orientation is the Registration Committee Policy Manual. During the term of the Committee, their knowledge and familiarity with assessment processes is strengthened through the review and use of established Committee policies, guidelines and precedence as they perform application reviews.

ii. individuals who make registration decisions

As indicated above the COTO Registration Committee is provided annual orientation that outlines the legislation and regulations guiding registration in the profession and provides policy guidelines outlined in a Policy Manual. The Policy Manual is regularly used by the Committee to guide their practices, and is updated on a regular basis. College legal counsel also provides a half-day in-house training session on how to complete application reviews and make decisions.

### iii. individuals who make internal review or appeal decisions

Not applicable - COTO does not have an internal review or appeal process. In cases where the Committee has not received sufficient information to make a registration decision, they may be asked or invited to provide more information to the Committee. In that case, it is the Registration Committee members who review the additional information provided.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

In 2009 it was determined that all COTO Registration Committee members, including experienced as well as new members should attend the committee orientation. Previously only new members received orientation.

In addition, it has been decided that the half-day in-house training session provided by College legal counsel should become a regular, added part of Committee orientation on an on-going basis.

Also, in 2009 the Policy Handbook was updated, revised and re-organized into a Policy Manual; several new policies were also added.

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## **Agreements on the Recognition of Qualifications (11 / 13)**

Examples of agreements on the recognition of professional qualifications include mutual recognition, reciprocity and labour mobility agreements. Such agreements may be national or international, between regulatory bodies, associations or jurisdictions.

a) List any agreements on the recognition of qualifications that were in place during the reporting period.

COTO has been a signatory to the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) Mutual Recognition Agreement (MRA) since it was negotiated and came into effect in July 2001.

In 2009 this was revised to become the ACOTRO Labour Mobility Support Agreement (LMSA), and COTO will be a signatory to this new agreement in early 2010.

b) Explain the impact of these agreements on the registration process or on applicants for registration.

The ACOTRO MRA allows for registrants in good standing in other Canadian jurisdictions to be registered in Ontario under a simplified process. The MRA allows the regulator in the original jurisdiction to forward the required registration documentation regarding its member directly to COTO, which facilitates and shortens the registration process for eligible applicants.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

In 2009 the Federal/Provincial/Territorial Agreement on Internal Trade (AIT) was amended, and important changes were made to the Labour Mobility Chapter (Chapter 7) that affected all regulated professions.

The new requirements include a simplified "permit on permit" registration process and also allows members registered in one jurisdiction with Term, Limits or Conditions (TCLs) or practising with a restricted practice certificate of registration to be registered in another Canadian jurisdiction, as long as the receiving jurisdiction can, within provincial legislation and regulation, provide for similar TCLs or restrictions.

One of the most significant changes for the Occupational Therapy profession is that members are no longer required to have worked in another Canadian jurisdiction in order to be eligible to benefit from the labour mobility provisions. Previously, OTs were required to be registered and have practised in another province for 3 years in order to be eligible to use the MRA provisions; under the LMSA an individual simply needs to be registered in good standing in another jurisdiction.

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## Data Collection (12 / 13)

### Languages in which application information materials are available

a) Indicate the languages in which application information materials were available in the reporting year.

Language	Yes/No
English	Yes
French	Yes
Other (please specify)	

### Paid staff employed by your organization

b) In the table below, enter the number of paid staff employed by your organization in the categories shown, on December 31 of the reporting year.

When providing information for each of the categories in this section, you may want to use decimals if you count your staff using half units. For example, 1 full-time employee and 1 part-time employee might be equivalent to 1.5 employees.

You can enter decimals to the tenths position only. For example, you can enter 1.5 or 7.5 but not 1.55 or 7.52.

Category	Staff
<b>Total staff employed by the regulatory body</b>	16
<b>Staff involved in appeals process</b>	n/a
<b>Staff involved in registration process</b>	2

### Countries where internationally educated applicants were initially trained

c) In the following table, enter the top source countries where your applicants\* were originally trained in the profession (**excluding** Canada), along with the number of applicants from each of these source countries.

Enter the country names in descending order. (That is, enter the source country for the greatest number of your applicants in the top row, the source country for the second greatest number in the second row, etc.)

Use the dropdown menu provided in each row to select the country.

Note that only one country can be reported in each row. If two or more countries are tied, enter the information for these tied countries in separate rows.

Country of training (Canada excluded)	Number of applicants in the reporting year
U.S.	14
Philippines	8
India	5
Australia	3
U.K.	3
New Zelnd	1
France	1
Germany	1
Taiwan, Province Of China	1
Iran	1

\*Persons who have applied to start the process for entry to the profession.  
 Select "n/a" from the drop-down list if you do not track this information. Enter "0" in a "Number of applicants" field if you track the information, but the correct value is zero.

**Jurisdiction where members were initially trained**

d) Indicate where your members\* were initially trained in the profession (use only whole numbers; do not enter commas or decimals).

The numbers to be reported in the **Members** row are the numbers on December 31<sup>st</sup> of the reporting year. For example, if you are reporting registration practices for the calendar year 2009, you should report the numbers of members in the different categories on December 31<sup>st</sup> of 2009.

	Jurisdiction where members were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
<b>Members on December 31<sup>st</sup> of the reporting year</b>	3700	450	129	341	0	<b>4620</b>

\* Persons who are currently able to use the protected title or professional designation of the profession.

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

**Applications your organization processed in the past year**

e) State the number of applications your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total

<b>New applications received</b>	252	31	14	24	0	<b>321</b>
<b>Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)</b>	252	31	14	24	0	<b>321</b>
<b>Inactive applicants (applicants who had no contact with your organization in the reporting year)</b>	n/a	n/a	n/a	n/a	n/a	<b>0</b>
<b>Applicants who met all requirements and were authorized to become members but did not become members</b>	1	0	0	0	0	<b>1</b>
<b>Applicants who became members</b>	239	20	8	16	0	<b>283</b>
<b>Applicants who were authorized to receive an alternative class of licence* but were not issued a licence</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who were issued an alternative class of licence*</b>	84	2	0	3	0	<b>89</b>

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

	<b>Class of licence</b>	<b>Description</b>
		Applicants for a Provisional certificate must fully register with the College prior to commencing employment. Fees for Provisional registration are the same as for a General Practising certificate. Annual registration applies to all certificates active at May 31. Provisional registrants are required to write the next

a)	Provisional	<p>available CAOT exam following their date of registration with the College. Their certificate of registration will be valid until sixty days after the exam date. During this period, documentation must be provided to the College, demonstrating successful completion of the exam. Upon acceptance, the College will issue the registrant a General Practising certificate within thirty days, provided all other requirements for registration continue to be met. The Provisional Practising registrant's certificate will expire if the conditions established by the College are not met within the required time period. The College requires that a Provisional Practising registrant be supervised during the period for which the certificate is issued or until all outstanding requirements have been met and have been documented with the College. The supervisor must hold a General Practising certificate of registration with the College and have at least one year of practice experience.</p>
b)	Temporary	<p>A temporary certificate of registration may be granted to individual occupational therapists who hold a valid certificate of registration as an occupational therapist in another jurisdiction with similar educational and clinical requirements. The individual will be providing short term (no longer than four months) occupational therapy services in Ontario that include a component of direct assessment or treatment of clients. A temporary certificate is not intended for therapists who are working in short term contract positions but rather for individuals who are coming into Ontario for such activities as a work exchange or participating in a continuing education workshop/course that involves clients or providing consultation.</p>
c)		
d)		
e)		
f)		
g)		
h)		
i)		

j)

### Reviews and appeals your organization processed in the past year

f) State the number of reviews and appeals your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee	11	1	1	13	0	26
Applicants who initiated an appeal of a registration decision	0	0	0	0	0	0
Appeals heard	n/a	n/a	n/a	n/a	n/a	0
Registration decisions changed following an appeal	n/a	n/a	n/a	n/a	n/a	0

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

Appeals are not heard at the College. Applicants may appeal a Registration Committee decision by contacting HPARB.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

**Certification (13 / 13)**

I hereby certify that:

- I have reviewed the information submitted in this Fair Registration Practices Report (the "Report").
- All information required to be provided in the Report is included.
- The information contained in the Report is accurate.

Name of individual with authority to sign on behalf of the organization: Elinor Larney

Title: Deputy Registrar

Date: February 26, 2010