# **Fair Registration Practices Report**

# **Occupational Therapists (2015)**

The answers seen below were submitted to the OFC by the regulated professions.

This Fair Registration Practices Report was produced as required by:

- the Fair Access to Regulated Professions and Compulsory Trades Act (FARPACTA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPACTA
- 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.

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# 1. Qualitative Information

# a) Requirements for registration, including acceptable alternatives

# i. Describe any improvements / changes implemented in the last year.

As of May 1, 2015, internationally educated occupational therapist (IEOT) applicants were required to complete the Substantial Equivalency Assessment System (SEAS) as the first step in the registration process in Ontario (as well as all other provinces in Canada, with the exception of Quebec). The Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) administers SEAS as a third-party service provider to the College. Components of SEAS include an academic credential assessment (ACA) completed by World Education Services (WES) and completion of a profession-specific credential assessment (PSCA). Applicants are also required to complete a Jurisprudence Knowledge Assessment Test (JKAT) and Competency Assessment.

The College's policy regarding Insufficient and/or Inadequate Documentation (8-110) (http://www.coto.org/pdf/policy/insufficent-documentation8-110.pdf) was revised to reflect this transition to the ACOTRO SEAS process.

Both WES and ACOTRO have adopted policies regarding the provision of documentation that are consistent with this policy. For more information regarding WES and ACOTRO SEAS policies, please see: www.wes.org/ca/ or www.acotro-acore.org/.

# ii. Describe the impact of the improvements / changes on applicants.

The revision of the College's policy regarding Insufficient and/or Inadequate Documentation ensures that these provisions are consistently implemented as part of the newly-introduced SEAS process. This ensures fairness to applicants who find it difficult or impossible to obtain sufficient original documentation to support their application for registration due to exceptional circumstances (which may include but are not limited to: war; natural disaster; or political persecution) are afforded an opportunity to provide alternative evidence to third-party assessment agencies as well as to the College.

Harmonizing registration standards and assessment practices across Canada will promote fairness and consistency, and support labour mobility for IEOTs.

# iii. Describe the impact of the improvements / changes on your organization.

The revision of this policy ensures that the College policy regarding Insufficient and/or Inadequate Documentation is included and consistently implemented as part of the newly-introduced SEAS process.

#### b) Assessment of qualifications

# i. Describe any improvements / changes implemented in the last year.

On May 1, 2015 the SEAS process was implemented (http://www.acotro-acore.org/seas-introduction). SEAS is the culmination of the five-year Harmonization Project undertaken by the ACOTRO which is the national organization of occupational therapy (OT) regulators in Canada.

ACOTRO began the Harmonization Project in 2010, with federal funding, as a continuation of collaborative efforts to develop and implement a common assessment approach for the qualification recognition and competence based assessment of IEOTs. ACOTRO's rationale for undertaking this work was to promote fairness and consistency, and support labour mobility for IEOTs by harmonizing registration standards and assessment practices across Canada. Competency assessment and jurisprudence learning and assessment components were also introduced as part of the new assessment of qualifications.

Prior to the Harmonization Project, different provinces used different approaches and providers to assess academic equivalency. In addition, the assessment process was paper-based and only looked at the education an IEOT had completed. There was no way to assess the knowledge, skills and

competencies that they may have gained through years of professional practice experience. There were also limited resources for IEOTs to learn about the legislative framework of OT practice in Canada.

Working together on the Harmonization Project allowed all Canadian OT regulators, including those in smaller provinces and with far fewer members and resources, to contribute and benefit equally from this pan-Canadian initiative. This would have been impossible if each jurisdiction were working independentl. Having a national assessment system takes advantage of economy of scale. All IEOT applicants planning to work anywhere in Canada (except Quebec) now go through a common, fair and transparent assessment that includes a competency assessment using a trained roster of assessors. This would not have been feasible to implement in individual provinces that receive few IEOT applications per year.

As of May 1, 2015, SEAS is the process used by all OT regulators in Canada (except Quebec) to assess the education and skills of IEOTs applying for registration in Canada.

SEAS has four main components:

- 1. Academic Credential Assessment (ACA)
- 2. Curriculum and Fieldwork Profession-Specific Credential Assessment (PSCA) Review
- 3. Jurisprudence Knowledge Assessment Test (JKAT)
- 4. Competency Assessment

The substantial equivalency model includes both *qualification recognition* and *competency verification* activities. Qualification recognition focuses on an ACA and a PSCA; these both examine the education documents and transcripts provided by IEOTs. Competency verification focuses on occupational therapy knowledge and jurisprudence, and includes the JKAT as well as an in-person competency assessment. The JKAT (http://www.acotro-acore.org/seas/jurisprudence-knowledge-assessment-test-jkat) is a new part of the IEOT assessment process. The purpose of the JKAT is to assess the applicant's knowledge and understanding of the rules of occupational therapy practice in Canada.

The JKAT is an online, multiple choice question exam. The JKAT is proctored virtually, which means that a proctor joins the test taker via his/her computer and computer screen. Applicants are allowed to refer to the Canadian Occupational Therapist Jurisprudence Learning module (developed by ACOTRO) during the examination, but not to notes or other resources. Applicants have two opportunities to attempt the JKAT and applicants are informed within minutes of having completed the exam whether or not they have passed.

The in person Competency Assessment is a structured interview with a trained OT assessor that evaluates an IEOT's ability to apply his/her occupational therapy knowledge, skills and judgement to ensure that he or she has the entry-level competencies required for safe and ethical practice.

This multi-step process, some of which can be completed online, begins with an initial application to ACOTRO. Applicants have up to one year to complete the process. Once all of the steps are completed, ACOTRO submits a Disposition Report to the provincial regulator in the province in which an applicant seeks to register. This report indicates whether or not the applicant has met the requirement for substantial equivalency. If the applicant has done so, he or she will then follow further steps outlined by the provincial regulator in order to qualify to be registered.

As part of SEAS, all IEOTs will also be required to demonstrate a minimum level of language proficiency in English or French to ensure that their language skills are adequate for the purpose of completing SEAS. The language benchmark for SEAS corresponds to Ontario's language fluency requirement for registration.

In order to fully inform and ensure fairness to applicants, the College proactively notified all IEOTs who had applied and not yet completed the registration process about the May 1, 2015 implementation of SEAS. Communication began in December 2014 with a web notice posted on the College's website and continued into 2015. All IEOTs who had a current application on file or who had previously applied and whose application was now expired (an application remains active for 12 months) with the College were individually contacted by email and advised on the implementation of SEAS and how this could affect their application.

The College also worked with the Canadian Association of Occupational Therapists (CAOT), who administers the National Occupational Therapy Certification Examination (NOTCE), to inform IEOTs about the introduction of SEAS. CAOT put a notice on its website and also sent an email to all IEOTs who had applied to write the NOTCE. This included IEOTs who were actively in the process of registering for and attempting the exam, but also those who had applied previously and never attempted or completed it. The College also worked with a number of other stakeholders (HealthForceOntario, Global Experience Ontario, etc.) to ensure that information regarding the registration process in Ontario was updated to reflect the new process.

# ii. Describe the impact of the improvements / changes on applicants.

The College's proactive communications resulted in 159 IEOTs applying to the College the first four months of 2015 (prior to the May 1, 2015 deadline). To put this in context, during the previous year (2014) the College received only 66 applications from IEOTs during the entire year.

Many IEOT applicants who had expired application files or who had not yet applied for registration decided to apply prior to May 1, 2015 in order to have their file assessed through the paper based pre-SEAS assessment process.

Applicants were not disadvantaged in any way. The College put extra resources into hiring a part-time registration staff member and holding a greater number of Registration Committee meetings so that files were processed as quickly as possible. As indicated in section e) Timelines, given this transition to a new process, the College tried to ensure all applicants had two opportunities to write the NOTCE exam under their application. To allow for this, the College granted extensions in some cases.

The introduction of the Canadian Occupational Therapist Jurisprudence Learning Module and JKAT is an important benefit for IEOTs. It provides an opportunity for all IEOTs seeking to register in Canada to learn about the ethics and jurisprudence of Canadian occupational therapy practice and provide evidence of this learning through successful completion of the JKAT.

The Competency Assessment is fairer as it allows IEOTs, who are usually experienced practitioners, to demonstrate in an interactive way what they know and can do, as opposed to what they studied in the OT program years before.

#### iii. Describe the impact of the improvements / changes on your organization.

The implementation of SEAS in May 2015 and the resulting large influx of IEOT applications resulted in significant resource and time demands on the College's staff and Registration Committee, including:

- College staff identified all open and expired IEOT applications and communicated with all applicants regarding the implementation of SEAS and how it would affect them.
- College staff responded to a large increase in the number of telephone and email requests for information.
- The College received a huge influx of IEOT applications, requiring processing by College registration staff and the Registration Committee.
- Due to the pressures on College staff, the College was required to hire an additional part-time registration staff person and pay for consulting services to revise all of the policies affected by the implementation of SEAS (see Section F).
- The College held a greater number of Registration Committee meetings in order to process the large number of pre- May 1, 2015 IEOT applications, doubling the College's expenses related to this committee.

Despite the additional resources requirements associated with the transition to a new process, SEAS has introduced a more robust assessment process that permits IEOTs to better understand the Canadian health system and recognizes experience through competency assessment.

#### c) Provision of timely decisions, responses, and reasons

# i. Describe any improvements / changes implemented in the last year.

159 IEOTs applied after the College gave notice of the process change (introduction of SEAS) publicly on the College's website and by individual communications to applicants.

The Registration Committee worked through the applications as quickly as possible, but in some cases there were delays. For example in some cases applicants' academic equivalency was not confirmed in time for them to register for and write the July and/or November 2015 NOTCE. In order to be fair to these applicants an extension was granted past the one year application deadline to allow them two attempts at the NOTCE.

# ii. Describe the impact of the improvements / changes on applicants.

Given the consideration of individual circumstances and the accommodations provided, the College hopes that negative effects on applicants were limited. Those who chose to apply prior to the May 1, 2015 deadline had their applications assessed using the pre-SEAS process and were provided a one year period in which to meet all requirements. The College also developed and applied consistent criteria for determining if an applicant should be allowed an extension to meet a requirement; in many cases this was allowed, in particular to allow IEOTs two attempts of the NOTCE.

In cases where an applicant was unable to meet the requirements within the one year period, they were notified that their application had expired and should they wish to proceed with registration as an occupational therapist in Ontario, they would need to go through the ACOTRO SEAS process.

# iii. Describe the impact of the improvements / changes on your organization.

The large increase in the number of IEOT applications prior to the May 1, 2015 SEAS implementation date put significant resource and time demands on the registration staff and Registration Committee. Once particular implementation challenges became apparent, such as the time limit for pre-May 1, 2015 IEOT applicants to complete the NOTCE, the College made decisions to ensure a fair transition processes. In order to handle the large increase in applications the College hired a half-time registration staff person and held a greater number of Registration Committee meetings. This resulted in increased costs to the College in the form of salary costs, per diems and travel and accommodations expenses for Registration Committee members.

As part of SEAS implementation, the College also incurred increased legal costs to obtain guidance pertaining to various issues resulting from the influx of IEOT applications.

# d) Fees

#### i. Describe any improvements / changes implemented in the last year.

The implementation of SEAS has resulted in a number of changes regarding the application process and related fees. These fees are not paid to the College but to ACOTRO, which is now the first point of contact for IEOTs applying to register and serves as a third-party assessment agency for all occupational therapy regulatory bodies in Canada, with the exception of Quebec. The fees to complete the SEAS process are higher than those previously charged to IEOT applicants. SEAS is more costly to administer due to it inclusion of a greater number of and more in-depth components, including the in-person Competency Assessment.

SEAS is built on a three-point, graduated fee structure that allows applicants to pay only as they progress successfully through the assessment process. The points of payment for the new SEAS fees are:

- First installment: \$200.00 Upon initial application and submission of the WES Academic Credential Assessment
- Second Installment: \$1,100.00 Upon submitting the Profession-Specific Credential Assessment (PSCA) self-assessment form and documentation; and
- Third Installment: \$1,800.00 When registering for the Competency Assessment.
- TOTAL: \$3,100.00

This graduated process - tied to the various stages of the assessment model - ensures that those unlikely to proceed after the initial review of their education program will not be required to pay the fee for the competency assessment.

Other NEW registration-related fees:

- Electronic Proctoring for Jurisprudence Knowledge Assessment Test (JKAT): US \$ 25.00
- Travel and accommodation costs (if required) for in-person Competency Assessment: varies depending on location of applicant, interview location will be within a 500 km radius of the applicant.
- SEAS Hold Fee (Extension Fee): \$50.00
- SEAS Reconsideration Fee (per request): \$250.00
- Duplicate SEAS Disposition Report or document fee: \$25.00
- Administration Fee for file copying: \$40.00 plus .05 per page

Other fees related to the registration process that did not change:

- WES Academic Credential Report: \$180.00
- Language Assessment (if needed): \$250.00 \$350.00
- Certified Translations (if needed): varies
- Document/transcript request fees to academic institution: varies
- NOTCE National Exam: \$550.00

All fees are subject to GST and/or HST.

IEOT applicants who did not successfully obtain registration through the pre-SEAS process were allowed the opportunity to reapply through the SEAS process. The College facilitated this and avoided some additional costs to applicants by transferring, with the permission of the applicant, all relevant documents from an applicant's pre-SEAS application with the College (e.g. academic credential assessment report, language fluency test results, certified translation of transcript etc.) to ACOTRO at no charge to the applicant.

#### ii. Describe the impact of the improvements / changes on applicants.

It is difficult to gauge the effect on applicants at this point. There was a great influx of IEOT applications just prior to the implementation of SEAS and the College continues to work through these applications. All IEOT applicants who applied to have their qualifications assessed after May 1, 2015 are now going through the national SEAS process. To date, none of these IEOT applicants have completed the national SEAS process and applied to the Ontario College for registration.

Having the College transfer IEOTs documents to ACOTRO for the SEAS assessment prevents duplication of efforts and reduces costs to applicants.

#### iii. Describe the impact of the improvements / changes on your organization.

The announcement of the implementation of SEAS, which has higher fees than the College's pre-SEAS paper-based assessment process, may have instigated the significant increase in the number of IEOT applications prior to May 1, 2015. As described in other sections, this large increase in IEOT applications put considerable resource and time pressures on College registration staff and the Registration Committee.

While the transfer of documents from an IEOT's unsuccessful pre-SEAS application to ACOTRO for a SEAS assessment is an operational cost to the College, it is seen as being efficient and helpful for IEOTs.

# e) Timelines

# i. Describe any improvements / changes implemented in the last year.

The implementation of SEAS began May 1, 2015. In order to ensure that IEOTs who could potentially be affected were aware of this the College posted a notice on its website (see http://www.coto.org/registration/newassessment.asp) and also communicated individually by email to all IEOTs who had an active application file as well as all those who had previously applied to the College and whose applications had expired.

CAOT put a notice on its web site and also emailed all IEOTs who had applied to write the NOTCE. This included IEOTs who were actively in the process of registering for and attempting the exam, but also those who had applied previously and never attempted or completed it.

IEOTs were advised in all communications that those who applied for registration with the College prior to May 1, 2015 and those whose applications were being processed by the College would have one year from the date of they submitted their application to complete their registration process under the pre-SEAS process. IEOTs who did not complete their registration within the one year period would need to apply to ACOTRO to complete the SEAS process. Applicants are permitted one year to complete the SEAS process. This timeline is consistent with the pre-SEAS application process.

### ii. Describe the impact of the improvements / changes on applicants.

The College received 159 IEOT applications within the first four months of 2015, as compared to 66 total in the entire 2014 year. Due to this high volume of applications, additional processing time was required. However, in order to ensure that those IEOTs who applied before the May 1, 2015 deadline were not disadvantaged in any way, the College, based on consistent criteria, in some cases extended the application to allow applicants to complete certain requirements (e.g. additional training, refresher programs, legal work status, two attempts at the NOTCE).

# iii. Describe the impact of the improvements / changes on your organization.

The May 1, 2015 SEAS implementation date put significant resource and time demands on the registration staff and Registration Committee as they strove to maintain regular customer service standards for processing application files. In order to meet the increased demands a part-time registration staff person was hired and the Registration Committee met much more frequently throughout the year. This resulted in increased costs to the College, including salary costs and per diems and travel and accommodations expenses for Registration Committee members. The costs for Registration Committee activities were double what they were in the previous year.

#### f) Policies, procedures and/or processes, including by-laws

# i. Describe any improvements / changes implemented in the last year.

Due to the implementation of SEAS a number of College policies needed to be revised. This included policies related to:

- 1. Education & Fieldwork (policies 8-10, 8-20, and 8-21)
- 2. Academic Equivalency Review (policy 8-30)
- 3. Language fluency (policies 8-80 and 8-81)
- 4. Request for Exemption from Language Fluency Requirement (8-90)
- 5. Insufficient or Inadequate Documentation (8-110)
- 6. Access to Records (8-170)
- 7. Assessment of Qualifications (8-180 and 8-181)

All of these revised policies were posted publicly in May 2015 on the College's website on the Registration and Customer Service Policies page at: http://www.coto.org/registration/policies.asp.

#### ii. Describe the impact of the improvements / changes on applicants.

Posting the revised policies on the College's website in a timely manner meant that all IEOTs potentially affected by the introduction of SEAS had clear information about the change in process and that the College was transparent in explaining how SEAS implementation would affect IEOTs. A number of the policies (8-20; 8-80 and 8-180) were specific to those IEOTs who had applied prior to May 1, 2015 in order to ensure that such applicants who were in process would not be confused about how SEAS implementation would affect them.

Policies were restructured to help IEOTs clearly understand, as of May 1, 2015 the respective roles of the College (still the regulator) and ACOTRO (the new third-party assessment body). Policies were also written in as plain language as possible to make them easy to understand. Through these efforts, the College hopes that IEOTs were and are able to understand the implementation of SEAS and how it may affect their application.

# iii. Describe the impact of the improvements / changes on your organization.

Revising the policies provided clarity and guidance for registration staff and the Registration Committee regarding the assessment of IEOT applicant files. Making the policies publicly available made it easier for College staff to explain and refer IEOTs to specific written information for guidance and clarity and ensured that the College's messaging was transparent and consistent. The College incurred costs to hire a consultant to review and revise all of these policies, due to constraints on staff time.

#### g) Resources for applicants

# i. Describe any improvements / changes implemented in the last year.

The implementation of the SEAS process on May 1, 2015 was a major change as IEOTs were required to begin the registration process by applying to ACOTRO. As of May 1, 2015 ACOTRO became the first point of contact for IEOT applicants and a third-party assessment body for all OT regulators in Canada, except Quebec. In preparation for this transition, a significant volume of new resources were made available to applicants so that they could understand the new process and, if their application was already in process, any implications for their individual registration process.

### Resources included:

- posting a notice on the College website about SEAS implementation (http://www.coto.org/registration/newassessment.asp);
- communicating by email to all IEOTs who had open application files with the College;
- communication in writing to all IEOTs in the College database with expired applications;
- making more registration staff resources available to respond to IEOT requests for information and guidance regarding the pre- and post- SEAS implementation process;
- posting revised registration policies reflecting the new process on the College website (http://www.coto.org/registration/policies.asp); and
- working with ACOTRO to ensure consistent messaging regarding the implementation of SEAS, providing hyperlinks to the ACOTRO SEAS
  application site and redirecting post May 1, 2015 IEOT applicants to ACOTRO;
- liaising between registration staff of OT regulatory bodies across Canada, to ensure consistency of information provided to IEOTs and implementation of the SEAS process;
- holding information sessions at Health Force Ontario (HFO) to inform IEOTs about the implementation of SEAS;
- providing SEAS information to HFO, the Ministry of Health and Long-term Care, the Ontario Society of Occupational Therapists, CAOT etc. to ensure that all information provided to IEOTs by these organizations was accurate and up-to-date to reflect the introduction of SEAS.

### ii. Describe the impact of the improvements / changes on applicants.

Having all of these resources available to IEOT applicants ensured transparency regarding the change and ensured that IEOTs across Canada were receiving consistent information from all sources and were experiencing the SEAS transition in the same way.

# iii. Describe the impact of the improvements / changes on your organization.

Ensuring the provision of resource materials regarding the May 1, 2015 SEAS implementation put significant resource and time demands on the College registration and communications staff. In order to meet the increased demands a part-time registration staff person was hired and the College also incurred costs in having a consultant review and revise all of the Registration policies affected by SEAS implementation. This resulted in increased

costs to the College. The College also used this opportunity to review the appropriateness of registration resources for IEOTs.

#### h) Review or appeal processes

# i. Describe any improvements / changes implemented in the last year.

There were no changes to the College's review or appeal processes. However, due to the large increase in the the number of applications received, particularly prior to May 1, 2015, Registration Committee meetings were held more frequently in order to review the increased number of files received in a timely manner.

The new SEAS process includes a review process called Reconsideration, as follows (see http://www.acotro-acore.org/seas/reconsideration):

- Applicants may request a reconsideration of their SEAS final outcome.
- Applicants must use the Request for Reconsideration Form on the SEAS Portal and submit the request within 30 days of receiving their final report.
- The cost for requesting a reconsideration is \$250.00.
- The applicant's results will be reconsidered by a panel of SEAS Determination Committee members who were not involved in his/her initial
  assessment.
- · The results of the reconsideration panel are final.

### ii. Describe the impact of the improvements / changes on applicants.

The large volume of applications received prior to May 1, 2015 may have resulted in applicants experiencing a slightly longer review process by the College, though the College did its best to mitigate these effects by increasing registration resources.

There was no change regarding the processing of appeals by the Health Professions Appeal and Review Board (HPARB); this is a third-party appeal body separate from the College.

SEAS includes a Reconsideration policy that is transparent, objective, impartial and fair. No IEOTs have yet requested reconsideration as none have yet completed the SEAS process.

#### iii. Describe the impact of the improvements / changes on your organization.

The implementation of SEAS in May 2015 and the resulting large influx of IEOT applications resulted in significant resource and time demands on the College's staff and Registration Committee. This affected the College throughout all of 2015 and continues into 2016 as this large pool of IEOT applicants completes the registration process.

The College worked with other ACOTRO members to ensure that SEAS included a Reconsideration policy that is transparent, objective, impartial and fair. This means that ACOTRO, as a third-party assessment agency to the College, complies with the Fair Access to Regulated Professions and Compulsory Trades Act, 2006.

# i) Access to applicant records

# i. Describe any improvements / changes implemented in the last year.

In order to be consistent with SEAS implementation the College revised its Access to Records Policy (8-170): (http://www.coto.org/pdf/policy/accesstorecords-8-170.pdf). The policy remains consistent with the requirements of the Regulated Health Professions Act (RHPA) (1991):

#### Schedule 2: Disclosure of application file

16. (1) The Registrar shall give an applicant for registration, at his or her request, all the information and a copy of each document the College has that is relevant to the application.

#### Exception:

(2) The Registrar may refuse to give an applicant anything that may, in the Registrar's opinion, jeopardize the safety of any person. 1991, c. 18, Sched. 2, s. 16.

The one significant SEAS-related addition was: "As the College uses the services of third party assessment providers to complete assessments related to language fluency, education qualifications and fieldwork, the College normally holds only the final assessment documents. Applicants wishing to access more detailed information will be required to make a request directly to the agency that completed the assessment. All third-party service providers to the College have policies regarding access to records that are consistent with this policy."

# ii. Describe the impact of the improvements / changes on applicants.

This has no real impact on applicants, as they still have access to their applicant records as per the 16. (1) and 16. (2) of the RHPA. Applicants completing the SEAS process and wishing to access more detailed information may make a request directly to ACOTRO.

# iii. Describe the impact of the improvements / changes on your organization.

Revising this policy has caused little change for the College, but clarifies what type of information the College and ACOTRO respectively hold and must be provided upon request by the applicant.

# j) Training and resources for registration staff, Council, and committee members

i. Describe any improvements / changes implemented in the last year.

New College registration staff and some Registration Committee members attended the Managing Cultural Difference Part 1 workshop organized by Ontario Regulators for Access (ORAC). Staff who had previously attended the Part 1 workshop attended the ORAC Managing Cultural Differences Part 2 Workshop: (http://www.regulatorsforaccess.ca/docs/workshop/ORAC%20MCD%20Flyer.pdf).

As in the past, Registration Committee orientation included training from College legal counsel regarding fairness legislation, bias and human rights obligations. This is routinely included as part of the annual Registration Committee orientation.

The College's Registration Committee piloted the Office of the Fairness Commissioner's (OFC's) learning module "Understanding Fair Access Law", and provided feedback. The College now uses the module for training of the Registration Committee and registration staff.

#### ii. Describe the impact of the improvements / changes on applicants.

This ensures that all applicants experience a registration process that is transparent, objective, impartial and fair.

#### iii. Describe the impact of the improvements / changes on your organization.

This ensures that all registration staff and the Registration Committee are well versed in fairness principles, understand the obligations of the College and are aware of and avoid making registration decisions that may be consciously or unconsciously biased, discriminatory or violate an applicant's human rights. This applies to the consideration of all applications, whether domestically or internationally trained. The managing cultural differences workshops have helped staff and the Committee appreciate perceptions and experiences of IEOTs and recognize diversity in cultural. The workshops have also prompted staff to use more effective language in verbal and written communication.

#### k) Mutual recognition agreements

### i. Describe any improvements / changes implemented in the last year.

There were no changes to the Occupational Therapy Labour Mobility Support Agreement (LMSA). However, the introduction of SEAS is consistent with promoting labour mobility as all IEOTs intending to practice in any Canadian jurisdiction (except Quebec) will go through the same assessment process and must meet the same registration requirements.

#### ii. Describe the impact of the improvements / changes on applicants.

No changes this year

#### iii. Describe the impact of the improvements / changes on your organization.

No changes this year

# I) Other (include as many items as applicable)

# i. Describe any improvements / changes implemented in the last year.

As detailed in many of the other sections of this report, with the implementation of the SEAS the College will cease having the Registration Committee complete education assessments for IEOTs. As of May 1, 2015 ACOTRO is the first point of contact for IEOTs and the third-party assessment agency for all occupational therapy regulators in Canada, except Quebec, please see section b) Assessment of Qualifications for more details.

## ii. Describe the impact of the improvements / changes on applicants.

It is difficult to gauge the effect on IEOTs yet as by the end of December 2015 none had yet completed the entire SEAS process and applied to the College for registration.

# iii. Describe the impact of the improvements / changes on your organization.

At the end of December 2015 the College was still handling the large number of IEOT applications received prior to the May 1, 2015. It is difficult to gauge how the implementation of SEAS will affect the number and nature of IEOT applications that will be received in 2016 and beyond. In future IEOTs will be applying to the Ontario College after have completed SEAS and received a Disposition Report determining whether they have demonstrated substantial equivalency or not.

#### Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year

No changes this year

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# a) Languages

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

Language Yes/No
English Yes
French Yes
Other (please specify) 0
Additional comments:

French is provided when requested for most application materials.

# b) Gender of applicants

Indicate the number of applicants in each category as applicable.

Gender Number of Applicants

Male 57
Female 570
None of the above 0
Additional comments:

c) Gender of members

Indicate the number of members in each category as applicable. Select the option that best corresponds to the terminology used by your organization.

Gender Number of Members

Male 409 Female 5207 None of the above 0

Additional comments:

# d) Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education in the profession or trade.

| Ontario | Other Canadian Provinces | USA | Other International | Unknown | Total |
|---------|--------------------------|-----|---------------------|---------|-------|
|         |                          |     | Argentina 2         |         |       |
|         |                          |     | Australia 11        |         |       |
|         |                          |     | Bangladesh 1        |         |       |
|         |                          |     | Belgium 1           |         |       |
|         |                          |     | Brazil 4            |         |       |
|         |                          |     | Colombia 1          |         |       |
|         |                          |     | Germany 1           |         |       |
|         |                          |     | Hong Kong 4         |         |       |
|         |                          |     | India 33            |         |       |
|         |                          |     | Iran 13             |         |       |
|         |                          |     | Ireland 1           |         |       |
| 419     | 49                       | 33  | Israel 2            | 0       | 627   |
|         |                          |     | Jordan 2            |         |       |
|         |                          |     | Lebanon 1           |         |       |
|         |                          |     | Norway 1            |         |       |
|         |                          |     | Pakistan 6          |         |       |
|         |                          |     | Philippines 24      |         |       |
|         |                          |     | Singapore 1         |         |       |
|         |                          |     | S. Africa 3         |         |       |
|         |                          |     | Korea 3             |         |       |
|         |                          |     | Sweden 1            |         |       |
|         |                          |     | U.K. 10             |         |       |
|         |                          |     | Total 126           |         |       |

<sup>&</sup>lt;sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

# Additional comments:

|        | number of applicants who becar<br>ssion or trade. | ne registe | ered members in the reporting year by the jurisdiction where they obtained the | ir initial educ | ation <sup>1</sup> |
|--------|---|------------|--|-----------------|--------------------|
| ntario | Other Canadian Provinces                          | USA        | Other International  | Unknown         | Tota               |
|        |   |            | Australia 7  |                 |                    |
|        |   |            | Brazil 1   |                 |                    |
|        |   |            | Colombia 1   |                 |                    |
|        |   |            | Hong Kong 2  |                 |                    |
|        |   |            | India 7  |                 |                    |
| 0.40   | 0.0   | 4.0        | Iran 2   |                 | 404                |
| 342    | 36  | 18         | Israel 1   | 0               | 429                |
|        |   |            | Jordan 1   |                 |                    |
|        |   |            | Pakistan 1   |                 |                    |
|        |   |            | Philippines 5  |                 |                    |
|        |   |            | U.K. 5   |                 |                    |
|        |   |            | Total 33   |                 |                    |

| Additional co | mments |
|---------------|--------|
|---------------|--------|

# f) Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education<sup>1</sup> in the profession or trade.

| Ontario | Other Canadian Provinces | USA | Other Int                 | ernational | Unknown | Tot |
|---------|--------------------------|-----|---------------------------|------------|---------|-----|
|         |                          |     | Australia                 | 26         |         |     |
|         |                          |     | Brazil                    | 7          |         |     |
|         |                          |     | China                     | 1          |         |     |
|         |                          |     | Colombia                  | 7          |         |     |
|         |                          |     | France                    | 1          |         |     |
|         |                          |     | Germany                   | 6          |         |     |
|         |                          |     | Hong Kong                 | 30         |         |     |
|         |                          |     | India                     | 87         |         |     |
|         |                          |     | Iran                      | 13         |         |     |
|         |                          |     | Ireland                   | 4          |         |     |
|         |                          |     | Israel                    | 10         |         |     |
|         |                          |     | Japan                     | 1          |         |     |
|         |                          |     | Jordan                    | 3          |         |     |
| 4543    | 516                      | 181 | New Zealand               | 6          | 0       | 56  |
|         |                          |     | Pakistan                  | 9          |         |     |
|         |                          |     | Philippines               | 43         |         |     |
|         |                          |     | Singapore                 | 1          |         |     |
|         |                          |     | Slovenia                  | 1          |         |     |
|         |                          |     | S. Africa                 | 17         |         |     |
|         |                          |     | Spain                     |            |         |     |
|         |                          |     | Sri Lanka                 |            |         |     |
|         |                          |     | Sweden                    |            |         |     |
|         |                          |     | Switzerland               |            |         |     |
|         |                          |     | Taiwan, Province Of China |            |         |     |
|         |                          |     | Thailand                  |            |         |     |
|         |                          |     | U.K.                      |            |         |     |
|         |                          |     | Total                     | 376        |         |     |

<sup>&</sup>lt;sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

| -  | Additional comments. |  |  |
|----|----------------------|--|--|
| П  |                      |  |  |
| -1 | I                    |  |  |
| 41 | I                    |  |  |

<sup>&</sup>lt;sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

# g) Applications processed

Indicate the number of applications your organization processed in 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)

| from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year  | Ontario | Other Canadian<br>Provinces | USA | Other<br>International | Unknown | Total |
|--|---------|-----------------------------|-----|------------------------|---------|-------|
| New applications received  | 419     | 49                          | 33  | 126                    | 0       | 627   |
| Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)      | 77      | 13                          | 15  | 93                     | 0       | 198   |
| Inactive applicants (applicants who had no contact with your organization in the reporting year)                           | 0       | 0                           | 0   | 0                      | 0       | 0     |
| Applicants who met all requirements and were authorized to become members but did not become members                       | 0       | 0                           | 0   | 0                      | 0       | 0     |
| Applicants who became FULLY registered members   | 245     | 34                          | 14  | 33                     | 0       | 326   |
| Applicants who were authorized to receive<br>an alternative class of licence <sup>3</sup> but were not<br>issued a licence | 0       | 0                           | 0   | 0                      | 0       | 0     |
| Applicants who were issued an alternative class of licence <sup>3</sup>  | 97      | 2                           | 4   | 0                      | 0       | 103   |

<sup>&</sup>lt;sup>1</sup> An alternative class of licence enables its holder to practice with limitations, but additional requirements must be met in order for the member to be fully licensed.

| Additional comm | ents: |
|-----------------|-------|
|-----------------|-------|

# h) Classes of certificate/license

Inidcate and provide a description of the classes of certificate/license offered by your organization.

You must specify and describe at least one class of certificate/license (on line a) in order for this step to be complete.

| #  | Certification                           | Description  |
|----|---|--|
| a) | General Certificate of Registration     | General Practising Certificates of Registration are issued to individuals who meet all of the requirements. General Practising Registrants are able to practice without restriction.   |
| b) | Provisional Certificate of Registration | Provisional Practising Certificates of Registration are issued to individuals who have not yet met the examination requirement. To register in this category, applicants must meet all of the requirements, with the exception of the examination. In addition, Provisional Practising Registrants must be registered to write the first available sitting of the exam, and have an offer of employment where they will be supervised by a Registrant who has held a General Practising Certificate of Registration for at least one year. |
| c) | Temporary Certificate of Registration   | This category of certificate is intended for those therapists who are registered in another jurisdiction (i.e., another province or country), but enter the province of Ontario to practice temporarily. To register in this category, applicants must have:  • A valid certificate of registration from another jurisdiction with education and clinical requirements equivalent to those of the College of Occupational Therapists of Ontario;  • Have an offer of employment or appointment that does not exceed                        |

|  | four | months | within | а | twelve-month | period |
|--|------|--------|--------|---|--------------|--------|
|--|------|--------|--------|---|--------------|--------|

- Have a General Practicing Registrant agree to supervise and be responsible for ensuring the provision of appropriate care for clients attended by the applicant;
- Have professional liability insurance that includes a sexual abuse therapy and counseling fund endorsement.

| - | - |   |    |    |     |            |    |    |      |
|---|---|---|----|----|-----|------------|----|----|------|
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|   |   |   |    |    |     |            |    |    |      |

# i) Reviews and appeals processed

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

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

| from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year   | Ontario | Other Canadian Provinces | USA | Other<br>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 | 8       | 2                        | 0   | 28                     | 0       | 38    |
| Applicants who initiated an appeal of a registration decision   | 0       | 0                        | 0   | 0                      | 0       | 0     |
| Appeals heard   | 0       | 0                        | 0   | 0                      | 0       | 0     |
| Registration decisions changed following an appeal  | 0       | 0                        | 0   | 0                      | 0       | 0     |

#### Additional comments:

### j) Paid staff

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, one full-time employee and one 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 |
|---|-------|
| Total staff employed by the regulatory body | 19.5  |
| Staff involved in appeals process           | 3     |
| Staff involved in registration process      | 4.5   |
| Additional comments:                        |       |

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# 3. Submission

I hereby certify that:

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

Kara Ronald

Title:

Deputy Registrar

Date:

2016/03/01

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