

Fair Registration Practices Report

Occupational Therapists (2017)

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.

Criminal Record Screening

Effective April 1, 2017, applicants are required to submit the results of a Vulnerable Sector (VS) Check as part of their application for registration with the College.

To register as an occupational therapist (OT) in Ontario, an applicant must provide evidence as to whether they have been found guilty of any offence arising in any jurisdiction, including, any criminal offence, or any offence relating to the practice of occupational therapy. In addition, there must be nothing in the applicant's previous conduct that will impact their ability to practice occupational therapy safely and ethically. The authority to require criminal record screening as part of the registration process is granted under Ontario Regulation 226/96: General.

VS Checks are only available to people who reside in Canada. To ensure that this requirement would not be a barrier to applicants who reside outside of Canada, the College's policy permits the Registrar to allow applicants who do not or have not resided in Canada to undergo an alternative criminal record screen approved by the Registrar. The Registrar will accept the results of a criminal record screen from the jurisdiction where the applicant currently resides. The Registrar requires the results of the same criminal record screening the Government of Canada accepts for immigration purposes.

Professional Liability Insurance

In June 2017 the College approved changes to the requirements for professional liability insurance. The change requires OTs carry insurance with at least five years of extension of coverage for claims made when on an extended leave, after retirement or otherwise ceasing to practice. Previously, the requirement was one year of coverage extension.

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

Criminal Record Screening

Permitting an alternative to the VS Check ensures applicants who do not reside in Canada are able to register in a

timely manner and eliminates barriers for internationally educated OTs. Establishing alternate criminal record screening requirements that are consistent with federal immigration requirements allows applicants to use a familiar process.

Professional Liability Insurance

The changes to professional liability insurance improve safeguards for both OTs and the public by ensuring that there is coverage available to respond to eligible claims for a period of five years after the OT ceases practice. Applicants to the College have the choice to purchase professional liability insurance through the national and provincial professional associations or other insurers whose plans have been confirmed to meet this new requirement.

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

Criminal Record Screening

Prior to April 1, 2017, the College relied on an applicant's self-declaration regarding their suitability to practise occupational therapy. The requirement for submission of results of specified criminal record screening provides evidence that assists the College fulfill its public protection mandate.

Professional Liability Insurance

The enhanced professional liability insurance requirements better safeguard the public and OTs by ensuring that there is extended coverage available to respond to eligible claims for a period of 5 years after the OT ceases practice. The College proactively worked with insurers to ensure the policies available to members of the profession meet the new requirements.

b) Assessment of qualifications

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

On May 1, 2015 the Substantial Equivalency Assessment System (SEAS) process was implemented (<http://www.acotro-acore.org/seas-introduction>). SEAS is the culmination of the five-year Harmonization Project undertaken by the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) which is the national organization of occupational therapy (OT) regulators in Canada.

SEAS has now been in place for over two years, and over 100 competency assessments have been administered. SEAS has embarked on evaluation of the system and initiated an item analysis of the competency assessment tool scheduled to be completed in 2018.

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

The item analysis will ensure that applicants continue to be assessed using a fair, valid, high quality tool.

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

The item analysis will ensure that applicants continue to be assessed using a fair, valid, high quality tool.

c) Provision of timely decisions, responses, and reasons

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

No changes this year

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

d) Fees

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

Criminal Record Screening

With the introduction of criminal record screening, applicants must pay for the required criminal record screen. Fees vary depending on the jurisdiction.

Liability Insurance

Changes to the professional liability insurance requirements did not impact the costs of coverage for applicants.

Substantial Equivalency Assessment System (SEAS)

SEAS is delivered on a cost recovery basis. At present, the application costs are not sufficient to fund SEAS resulting in a scheduled fee increase. Effective May 1, 2018, SEAS fees increasing as follows:

Activity	Current Fee	Fee as of May 1, 2018
Phase 1	\$200.00	\$300.00
Phase 2	\$1100.00	\$1300.00
Phase 3	\$1800.00	\$2000.00
Request for Extension	\$50.00	\$200.00

The SEAS program continues to monitor costs and look for efficiencies in program delivery.

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

These changes will result in an increase in fees payable by applicants. The College and SEAS continue to refer applicants to funding options available through the Immigrant Access Fund (IAF) <http://www.iafcanada.org/>.

The College continues to facilitate the transfer of internationally educated OT's documents to SEAS at no cost to applicant. The SEAS program provides the same free service to applicants applying the College, as requested.

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

The College continues to provide office space and other administrative support to SEAS in kind to offset SEAS program costs.

e) Timelines

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

No changes this year

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

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

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

All policies are posted publicly on the College's website: <https://www.coto.org/memberservices/policies>

All registration policies are routinely reviewed to ensure currency and relevancy.

Three new policies were created:

- Accommodation Requests in the Registration Process – The purpose of this policy is to describe the process the College follows when an applicant requests accommodation in relation to the College's registration process.
- Criminal Record Screening of Applicants and Members – The purpose of this policy is to describe the criminal record screening process required by the College.
- Determining Suitability to Practise at Registration – The purpose of this policy is to describe the process the College uses to evaluate information about an applicant's suitability to practise, and, to identify the criteria that the College uses when conducting such an evaluation.

Two policies were revised:

- Education & Fieldwork - Canadian Educated Applicants – This policy was revised to reflect possible outcomes for an applicant who completed a Canadian program that is not approved by the Registration Committee.
- Approved Examinations – This policy was revised to reflect the process for determining eligibility to write the approved examination.

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

The new and revised policies provide clarification on the requirements and processes for registration, including the legislative authority, procedures, decision criteria and possible outcomes. The College makes all registration policies publicly available to increase transparency of registration processes. These policies also help to ensure that registration processes are objective, impartial and fair.

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

Registration policies provided clarity and guidance for registration staff and the Registration Committee regarding the assessment of applicant files. Making the policies publicly available make it easier for College staff to explain registration policies and refer applicants to specific written information for guidance and clarity ensuring the College's messaging is transparent and consistent.

g) Resources for applicants

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

No changes this year

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

h) Review or appeal processes

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

No changes this year

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) Access to applicant records

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

No changes this year

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

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

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

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. Staff involved in the registration process also attend orientation. The College's Registration Committee completed the Office of the Fairness Commissioner's (OFC's) learning modules as part of their orientation.

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. This increased knowledge and understanding ensures registration decisions are not consciously or unconsciously biased, discriminatory or in violation of an applicant's human rights. This applies to the consideration of all applications, whether domestically or internationally trained.

k) Mutual recognition agreements

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

No changes this year

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

l) Other (include as many items as applicable)

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

The College developed a new examination administration agreement with the Canadian Association of Occupational Therapists (CAOT) for delivery of the National Occupational Therapy Certification Examination (the "approved examination").

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

This agreement ensures that applicants are writing an approved examination that continues to be delivered in a transparent, objective, impartial and fair manner.

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

The new agreement provides the College with confidence that the exam is being created, maintained, and delivered in an appropriate manner.

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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2. Quantitative Information

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:

b) Gender of applicants

Indicate the number of applicants in each category as applicable.

Gender	Number of Applicants
Male	48
Female	513
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	474
Female	5537
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 education¹ in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
437	68	18	Australia 10	0	561
			Bangladesh 1		
			Brazil 2		
			Costa Rica 1		
			India 5		
			Ireland 2		
			Jordan 1		
			Pakistan 1		
			Philippines 3		
			Portugal 1		
			S. Africa 2		
			U.K. 9		

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Total 38		

¹ 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:

e) Jurisdiction where applicants who became registered members obtained their initial education

Indicate the number of applicants who became registered members in the reporting year by the jurisdiction where they obtained their initial education¹ in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
373	57	14	Australia 5 Brazil 1 India 3 Ireland 1 Pakistan 1 Philippines 1 S. Africa 1 U.K. 2 Total 15	0	459

¹ 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:

f) Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education¹ in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
4876	563	189	Australia 34 Brazil 7 China 1 Colombia 6 France 1	0	6011

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Germany 7		
			Hong Kong 29		
			India 87		
			Ireland 6		
			Israel 8		
			Japan 1		
			Jordan 5		
			Lebanon 1		
			New Zealand 6		
			Pakistan 11		
			Philippines 49		
			Slovenia 1		
			S. Africa 16		
			Korea 1		
			Spain 1		
			Sri Lanka 1		
			Sweden 2		
			Switzerland 1		
			Taiwan, Province Of China 2		
			Thailand 1		
			U.K. 84		
			Iran 14		
			Total 383		

¹ 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:

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 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	437	68	18	38	0	561
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	64	11	4	23	0	102

from January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
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	221	52	13	15	0	301
Applicants who were authorized to receive an alternative class of licence ³ but were not issued a licence	0	0	0	0	0	0
Applicants who were issued an alternative class of licence ³	152	5	1	0	0	158

¹ 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 comments:

h) Classes of certificate/license

Indicate 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 practising certificate of registration	Description (a)
		General certificates are issued to individuals who meet all of the requirements. General members are able to practice without restriction
b)	Provisional practising certificate of registration	Description (b)
		Provisional certificates are issued to individuals who have not yet met the examination requirement or to individuals who have been found by the Registration Committee to require minimal educational upgrading to

achieve the equivalent of a Bachelor of Science degree or Master of Science degree in Occupational Therapy obtained in Ontario. To register in this category, applicants must meet all of the requirements, with the exception of the examination. In addition, provisional members 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 member who has held a general certificate for at least one year.

Description (c)

This category of certificate is intended for those applicants who are registered in another jurisdiction 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 a twelve-month period;
- Have a member who holds a general certificate 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.
- Meet the suitability to practise requirement

c) Temporary practising certificate of registration

Additional comments:

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 st to December 31 st of the reporting year	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	5	2	0	5	0	12
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

from January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
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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	21.6
Staff involved in appeals process	3
Staff involved in registration process	4

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:
 2018/02/28

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