

Fair Registration Practices Report

Occupational Therapists (2016)

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.

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

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.

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 internationally education occupational therapists (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. 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 evaluation 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.

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

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 improves fairness 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.

SEAS has introduced a more robust assessment process that permits IEOTs to better understand the Canadian health system and recognizes experience through competency assessment.

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

The College is confident that IEOTs across Canada are having their education and competencies assessed in a more consistent manner.

In most cases, IEOTs applying to the College have already met the education and language fluency requirements (through the SEAS process) which has resulted in less referrals to the Registration Committee.

c) Provision of timely decisions, responses, and reasons

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

Inquiries to the College are responded to in a timely manner, in most cases within 1-2 business days. Applications typically take 1-3 business days to process once an applicant demonstrates that they have met all registration requirements.

Applicants, whose applications are referred to the Registration Committee because they have not met one of the registration requirements, will take longer to process. The applicant will receive notice of the referral and be given 30 days to make submissions to the Committee. Once the Registration Committee makes a decision, 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. The Registration Committee generally meets 5 - 7 times per year, but will meet more if required.

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

Applicants are aware of the registration requirements and applications are processed once all requirements are met.

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

With the transition to the SEAS process, the College's application timelines for IEOTs have decreased because some of the registration requirements (education and language) will have been met prior to applying to the College.

d) Fees

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

No changes this year

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

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

Both the College and SEAS refer applicants to funding options available through the Immigrant Access Fund (IAF)

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

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. The College will continue this practice on an ongoing basis.

e) Timelines

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

Applications to the College are 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 a new application fee, and meet all registration requirements in place at the time of application.

Applicants who do not meet the currency requirement are provided six months to one year within which to meet the requirement (complete an approved refresher program). From the date the currency requirement is met, applicants are considered current for 18-months.

This information is on the College website and conveyed to the applicants in written correspondence sent to them during the application process.

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

Application timelines are clearly communicated to applicants.

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

Information provided during the application process is current and up to date.

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

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

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

Three policies were revised related to the SEAS process:

- Education and Fieldwork - Internationally Educated (8-21)
- Language Fluency – Requirement (8-81)
- Assessment of Qualifications (8-181)

Older policies, which reflected the College's pre-SEAS process, were retired and removed from the website.

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

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

Policies were revised to help IEOTs clearly understand the SEAS process and the respective roles of the College and ACOTRO. Policies were written in as plain language as possible to make them easy to understand. Through these efforts, the College hopes that IEOTs are able to understand the process for assessment of education qualification and the roles of each organization.

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.

g) Resources for applicants

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

In August 2016, the College launched a new website. The new website can be easily navigated and searched by applicants to find out information pertaining to the registration process for IEOTs, fees and timelines, and the National Occupational Therapy Certification Examination.

The College also created a map illustrating the IEOT application process and fees associated with each step. The map can be found on the College website here: <https://www.coto.org/docs/default-source/default-document-library/ieot-processmap.pdf?sfvrsn=4>

The College has also launched various social media channels that applicants can follow to stay up to date on College news, changes, and events.

The College has updated its Career Map with Global Experience Ontario (GEO) (translation and posting are pending GEO).

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

Applicants can access current and reliable information from several sources.

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

With the new website and launch of social media channels, the College can monitor which resources are most frequently used. This data can be utilized to help make decisions about future development and improvement of resources.

h) Review or appeal processes

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

Applicant volumes have normalized post-SEAS implementation.

There were no changes to the College's or SEAS' review or appeal processes.

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.

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

Reviews by the Registration Committee take place within approximately 30 days of receiving the required documents from the applicant.

SEAS includes a reconsideration policy that is transparent, objective, impartial and fair.

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

The SEAS process includes 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.

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 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.

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

I) Other (include as many items as applicable)

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

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)

Additional comments:

b) Gender of applicants

Indicate the number of applicants in each category as applicable.

Gender	Number of Applicants
Male	58

Female 499
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 448
Female 5365
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
463	59	11	Australia 8	0	557
			Bangladesh 1		
			Brazil 1		
			Colombia 1		
			India 2		
			Iran 2		
			Japan 1		
			Jordan 1		
			Lebanon 1		
			Philippines 3		
			U.K. 3		
			Total 24		

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
399	49	9	Australia 7	0	471
			Bangladesh 1		
			Brazil 1		
			Colombia 1		
			India 1		
			Japan 1		
			Lebanon 1		
			Philippines 1		
			Total 14		

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
4706	535	184	Australia 33	0	5813
			Bangladesh 1		
			Brazil 6		
			China 1		
			Colombia 6		
			France 1		
			Germany 7		
			Hong Kong 30		
			India 89		
			Iran 14		
			Ireland 4		
			Israel 10		
			Japan 1		
			Jordan 5		
			Lebanon 1		
			New Zealand 6		
			Pakistan 10		
			Philippines 49		
			Slovenia 1		
			S. Africa 17		
Korea 1					

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Spain 1		
			Sri Lanka 1		
			Sweden 2		
			Switzerland 1		
			Taiwan, Province Of China 3		
			Thailand 1		
			U.K. 86		
			Total 388		

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	463	59	11	24	0	557
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	64	10	2	10	0	86
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	394	49	7	14	0	464
Applicants who were authorized to receive an alternative class of licence³ but were not issued a licence	0	0	0	0	0	0
Applicants who were issued an alternative class of licence³	5	0	2	0	0	7

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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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 Certificate of Registration	<p style="text-align: center;">Description (a)</p> <p>General Practising Certificates of Registration are issued to individuals who meet all of the requirements. General Practising Registrants are able to practice without restriction.</p>
b)	Provisional Certificate of Registration	<p style="text-align: center;">Description (b)</p> <p>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.</p>
c)	Temporary Certificate of Registration	<p style="text-align: center;">Description (c)</p> <p>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:</p> <ul style="list-style-type: none"> • 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 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.

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	8	1	0	8	0	17
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
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:

2017/02/28

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