



REGISTRATION PRACTICES ASSESSMENT REPORT ***College of Occupational Therapists of Ontario (COTO)***

2016-2018 Assessment Cycle (Cycle 3)

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The Office of the Fairness Commissioner is an agency of the Ontario government, established under the Fair Access to Regulated Professions and Compulsory Trades Act, 2006. Its mandate is to ensure that regulated professions have registration practices that are transparent, objective, impartial and fair.

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AVAILABILITY OF REPORT

The Office of the Fairness Commissioner (OFC) provides this report to the regulatory body and posts the full report on its website, www.fairnesscommissioner.ca. In the interests of transparency and accountability, the OFC encourages the regulatory body to provide it to its staff, council members, other interested parties and the public.

Introduction

Assessment is one of the Fairness Commissioner's mandated roles under the [Fair Access to Regulated Professions and Compulsory Trades Act, 2006 \(FARPACKTA\)](#) and the [Regulated Health Professions Act, 1991 \(RHPA\)](#) – collectively known as fair access legislation.

Assessment Cycle

One of the primary ways the OFC holds regulators accountable for continuous improvement is through the assessment of registration practices using a [three -year assessment cycle](#).

Assessment cycles alternate between **full assessments** and **targeted assessments**:

- Full assessments address all specific and general duties described in the fair-access legislation.
- Targeted assessments focus on the areas where the OFC made recommendations in the previous full assessment.

Focus of this Assessment and Report

The 2016-2017 assessment of College of Occupational Therapists of Ontario is a full assessment.

The OFC's detailed report captures the results of the full assessment. However, practices related to provision of information are excluded for regulators who have previously been assessed. For those regulators, these practices have been removed from the report.¹ The assessment summary provides the following key information from the detailed report:

- duties that were assessed
- an overview of assessment outcomes for specific duty practices
- an overview of comments related to the general duty
- commendable practices
- recommendations

¹ These includes: all practices from Information for Applicants, practice 3 from Internal Review and Appeals, practice 1 from Information on Appeal Rights, practice 1 from Documentation of Qualifications, practice 1 from Assessment of Qualifications, practice 2 from Access to Records, and practices 4-11 from Transparency of the Registration Practices Assessment Guide.

Assessment Summary

Specific Duties

Specific duties assessed

The regulator has been assessed in all of the specific duties; including practices related to provision of information were evaluated in the assessment.

Comments

The regulatory body has demonstrated all of the practices in the following specific-duty areas:

- a) Information for applicants,
- b) Internal Review and Appeal processes,
- c) Information to applicants on Appeal Rights,
- d) Documentation of Qualifications,
- e) Assessment of Qualifications,
- f) Internal Training for College's staff and,
- g) Access to applicants records

General Duty

Assessment method

The following method was selected for the assessment of the general duty:

- a. OFC practice-based assessment (following the practices in the Assessment Guide)

Principles assessed

The regulator has been assessed on all of the general duty principles: transparency, objectivity, impartiality and fairness.

Comments

The OFC found that since the last assessment, the College of Occupational Therapists of Ontario has implemented measures to achieve more transparent, objective, impartial and fair practices. Allowing for all policies and procedures to be made available to the public on the College website and launching the Annual Report 2017 has been considered by the OFC as commendable practice and has also included suggestions for further improvement in this report.

Commendable Practices

A *commendable practice* is a program, activity or strategy that goes beyond the minimum standards set by the OFC assessment guides, considering the regulatory body's resources and profession-specific context. Commendable practices may or may not have potential for transferability to another regulatory body.

The regulatory body is demonstrating commendable practices in the following areas:

Specific Duty

- The College approved the Determining Suitability to Practice as part of their Registration Policy which describes the process that the College uses to evaluate information about the applicant's suitability to practice. It also identifies the criteria that the College uses for conducting an evaluation.
- The Introduction of Vulnerable Sector Check is a commendable practice that has been introduced, as part of the registration requirement aiming to protect the well-being of the public.

Opportunities for Continuous Improvement

- The College is expected to take the following efforts to help ensure continuous improvement:
 - a) Identify, if any potential procedural gaps for evaluating and monitoring third party assessment practices
 - b) Plan, document and implement those procedures periodically or at fixed intervals
 - c) Identify potential issues, and if any issues are identified, take actions to address them
- The College will engage the OFC on developments of the Common Competency Document and stakeholder feedback as appropriate.

RECOMMENDATIONS

The OFC has not made any recommendations for this assessment period. The OFC expects that the COTO will continue maintaining its standards in the future. In the spirit of continuous improvement, the OFC encourages COTO to continue its efforts towards more transparent, objective, impartial and fair registration processes.

Assessment History

In the previous assessment, the OFC identified the following:

2013-14 Assessment (Cycle 2) – Targeted assessment

- The targeted assessment covered the Assessment of Qualifications specific duties as well as the general duties of Transparency, Impartiality and Fairness that were assessed in the targeted cycle. The OFC found improvements but made additional suggestions for minor changes to further improve the fairness of the COTO's practices. Four commendable practices and two recommendations were identified. Each of the recommendations has been implemented.

Recommendations of previous assessments have been implemented. There are no recommendations in this assessment cycle to be implemented by the regulator.

Detailed Report²

Specific Duty

1. Specific Duty – Information for Applicants

RHPA, Schedule 2, s. 22.3

1. The regulator describes requirements for registration on its website. [Transparency]

Assessment Outcome	Demonstrated
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2. The regulator describes all the steps in the registration process on its website, including any processes for assessing qualifications. [Transparency]

Assessment Outcome	Demonstrated
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3. The regulator provides information on its website about how long the registration process usually takes, including the time required for assessing qualifications. [Transparency]

Assessment Outcome	Demonstrated
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4. The regulator publishes a fee scale on its website, showing all registration fees that are under the regulators control, including the fees required for assessing qualifications. [Transparency]

Assessment Outcome	Demonstrated
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5. The regulator ensures that the information required by practices 1-4 in this section is clear, accurate, complete and easy to find. [Transparency]

Assessment Outcome	Demonstrated
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² Please note: Suggestions for continuous improvement appear only in the detailed report. Suggestions for improvement are not intended to be recommendations for action to demonstrate a practice, but are made solely to provide suggestions for areas that a regulatory body may consider improving in the future.

2. Specific Duty — Timely Decisions, Responses and Reasons.

RHPA, Schedule 2, s.20 (1)

1. If a regulator rejects an application, it gives written reasons to the applicant. [Fairness, Transparency]

Assessment Outcome	Demonstrated
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2. The regulator makes registration decisions, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome	Demonstrated
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3. The regulator responds to applicants' inquiries or requests without undue delay*. [Fairness]

Assessment Outcome	Demonstrated
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4. The regulator provides internal reviews of decisions, or appeals from decisions, without undue delay*. [Fairness]

Assessment Outcome	Demonstrated
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5. The regulator makes decisions about internal reviews and appeals, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome	Demonstrated
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3. Specific Duty — Internal Review or Appeal

RHPA, Schedule 2, s. 15, s. 17, s. 19, s. 22.3

1. The regulator provides applicants with an internal review of, or appeal from, registration decisions. [Fairness]

Assessment Outcome	Demonstrated
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2. The regulator implements rules and procedures that prevent anyone who acted as a decision-maker in a registration decision from acting as a decision-maker in an internal review or appeal of that same registration decision. [Impartiality]

Assessment Outcome	Demonstrated
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3. The regulator provides information on its website that informs applicants about opportunities for an internal review or appeal. [Transparency]

Assessment Outcome	Demonstrated
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4. The regulator provides information on its website about any limits or conditions on an internal review or appeal*. [Transparency]

Assessment Outcome	Demonstrated
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4. Specific Duty — Information on Appeal Rights

RHPA, Schedule 2, s. 20, s. 21, s. 22

1. On its website, the regulator informs applicants of their right to request further review of, or appeal from, the review or appeal decision. [Transparency]

Assessment Outcome	Demonstrated
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5. Specific Duty - Documentation of Qualifications

RHPA, Schedule 2, s. 22.4(1)

1. The regulator provides information on its website about the documents that must accompany an application to demonstrate qualifications. [Transparency]

Assessment Outcome	Demonstrated
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6. Specific Duty — Assessment of Qualifications

RHPA, Schedule 2, s. 22.4(2)

1. On its website, the regulator informs applicants about the process, criteria, and policies for the assessment of qualifications. [Transparency]

Assessment Outcome	Demonstrated
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2. The regulator communicates the results of qualifications assessment to each applicant in writing. [Transparency]

Assessment Outcome	Demonstrated
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3. The regulator gives its assessors access to assessment criteria, policies and procedures. [Transparency]

Assessment Outcome	Demonstrated
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4. The regulator shows that its tests and exams measure what they intend to measure*. [Objectivity]

Assessment Outcome	Demonstrated
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5. The regulator states its assessment criteria in ways that enable assessors to interpret them consistently. [Objectivity]

Assessment Outcome	Demonstrated
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6. The regulator ensures that the information about educational programs that is used to develop or update assessment criteria is kept current and accurate. [Objectivity]

Assessment Outcome	Demonstrated
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7. The regulator links its assessment methods to the requirements/standards for entry to the profession or trade. [Objectivity]

Assessment Outcome	Demonstrated
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- 8. The regulator requires that assessors consistently apply qualifications assessment criteria, policies and procedures to all applicants. [Objectivity]**

Assessment Outcome	Demonstrated
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- 9. The regulator uses only qualified assessors to conduct the assessments. [Objectivity]**

Assessment Outcome	Demonstrated
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- 10. The regulator monitors the consistency and accuracy of decisions, and takes corrective actions as necessary, to safeguard the objectivity of its assessment decisions. [Objectivity]**

Assessment Outcome	Demonstrated
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- 11. The regulator prohibits discrimination and informs assessors about the need to avoid bias in the assessment. [Impartiality]**

Assessment Outcome	Demonstrated
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- 12. The regulator implements procedures to safeguard the impartiality of its assessment methods and procedures. [Impartiality]**

Assessment Outcome	Demonstrated
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- 13. The regulator gives applicants an opportunity to appeal the results of a qualifications assessment or to have the results reviewed. [Fairness]**

Assessment Outcome	Demonstrated
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14. The regulator assesses qualifications, communicates results to applicants, and provides written reasons for unsuccessful applicants, without undue delay. [Fairness]

Assessment Outcome	Demonstrated
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15. Regulators that rely on third-party assessments establish policies and procedures to hold third-party assessors accountable for ensuring that assessments are transparent, objective, impartial and fair. [Transparency, Objectivity, Impartiality, Fairness]

Assessment Outcome	Demonstrated
OFC Comments	<p>As of May 1, 2015 internationally-educated applicants are required to complete the Substantial Equivalency Assessment System (SEAS) as the first step in the registration process in Canada. The Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) administers SEAS as a third-party service provider to the College. Components of SEAS include providing to ACOTRO an academic credential assessment (ACA) completed by World Education Services (WES) and having ACOTRO complete a profession-specific credential assessment (PSCA). WES and ACOTRO each, have adopted policies regarding the provision of documentation that are consistent with this policy as per statements made in the Fair Access Report 2016.</p> <p>The College informs the OFC that the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) is the national organization of occupational therapy regulators in Canada. All occupational therapy regulatory bodies across Canada belong and contribute to the activities of ACOTRO. The organization is governed by a Board of Directors composed of the Registrars and/or ACOTRO representatives from each of the ten provincial regulators. All of the SEAS programs and policies are approved by the Board of Directors. The College maintains a high level of accountability and oversight for the SEAS process through the ACOTRO governance structure.</p> <p>In addition, the College has a Memorandum of Understanding (MoU) with ACOTRO for the provision of the Substantial Equivalency Assessment System (SEAS). The MoU addresses the fairness obligations, as well as other application of Ontario's legislation, including the <i>Ontario Human Rights Code</i> and the <i>Accessibility of Ontarians with Disabilities Act</i>. The MoU also sets the minimum service delivery expectations. The College has the ability to follow up directly with SEAS if there is a concern about the process, assessment results, or on the basis of information or a complaint from and applicant on any aspect of the SEAS process.</p>
Suggestions for continuous improvement	<ul style="list-style-type: none"> • The College is expected to take the following efforts to help ensure continuous improvement: <ul style="list-style-type: none"> d) Identify, if any potential procedural gaps for evaluating and monitoring third party assessment practices e) Plan, document and implement those procedures periodically or at fixed intervals

	<p>f) Identify potential issues, and if any issues are identified, take actions to address them,</p> <p>Examples of evidence of the above actions:</p> <p>a) Agendas and minutes from meetings with the third party</p> <p>b) Copies of, or excerpts from, formal agreements between the regulator and the third party</p> <p>c) Excerpts from meeting minutes or decision notes</p>
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7. Specific Duty — Training

RHPA, Schedule 2, s. 22.4(3)

1. The regulator provides training for staff and volunteers who assess qualifications or make registration, internal review or appeal decisions. [Objectivity, Impartiality, Fairness]

Assessment Outcome	Demonstrated
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2. The regulator addresses topics of objectivity and impartiality in the training it provides to assessors and decision-makers. [Objectivity, Impartiality]

Assessment Outcome	Demonstrated
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3. The regulator identifies when new and incumbent staff and volunteers require training and provides the training accordingly. [Objectivity, Impartiality, Fairness]

Assessment Outcome	Demonstrated
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8. Specific Duty — Access to Records

RHPA, Schedule 2, s. 16

1. The regulator provides each applicant with access to his or her application records.

Assessment Outcome	Demonstrated
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2. If there is a fee for making records available, the regulator gives applicants an estimate of this fee. [Transparency]

Assessment Outcome	Demonstrated
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3. If there is a fee for making records available, the regulator reviews the fee to ensure that it does not exceed the amount of reasonable cost recovery. [Fairness]

Assessment Outcome	Demonstrated
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General Duty

RHPA, Schedule 2, S.22.2

Transparency

- Maintaining openness
- Providing access to, monitoring, and updating registration information
- Communicating clearly with applicants about their status

Assessment Outcome	<p>Transparency</p> <p>A process is transparent if it is conducted in such a way that it is easy to see what actions are being taken to complete the process, why these actions are taken, and what results from these actions. In the regulatory context, transparency of the registration process encompasses the following:</p> <ul style="list-style-type: none"> • Openness: having measures and structures in place that make it easy to see how the registration process operates • Access: making registration information easily available. • Clarity: ensuring that information used to communicate about registration is
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	<p>complete, accurate and easy to understand.</p> <p>Openness:</p> <ul style="list-style-type: none"> • The College has revamped its website to make the information user friendly, open and clear to the public and applicants; making sure that the regulations, policies, procedures and overall information regarding the College activities are in plain language, has a responsive design and with enhanced search capabilities. The website was launched August 2016. • The College takes measures that make it easy for applicants, key decision-makers (e.g., registration staff, Registration Committee members and Council members) and the public to see how the registration process operates. It maintains several policies and procedures outlining assessment criteria and methods, as well as relevant background material (e.g. legislation). • The policies address the full spectrum of the registration process, including which requirements may be met through alternative means or subject to exemption. • Registration Committee and Council decision-making is governed by processes laid out in the COTO by-laws. <p>Access:</p> <ul style="list-style-type: none"> • The College initiated their Social Media strategy introducing social media channels to keep the public informed, such as LinkedIn, Twitter, Facebook and YouTube. • The College informs the OFC that the Registration Committee Policy Manual has been renamed the Registration Committee Manual. The manual contains information about Registration Committee processes. The policies are all public. <p>Clarity:</p> <ul style="list-style-type: none"> • The College demonstrates a willingness to be transparent about the process by which decisions are made. The college provides on its website eight principles of transparency which were developed by the Advisory Group for Regulatory Excellence and a working group of health regulators. These principles provide a framework for future decisions by the College. • Registration policies are developed and approved by the Registration Committee. Council are informed of policy changes as information only through quarterly Committee reports. Policies are developed through research, supporting evidence, and environmental scanning, which may include discussions with stakeholders, namely, other regulatory organizations. The COTO systematically reviews one-third of its registration policies each year for continued relevance and necessity. • If a policy requires changes that affect registration practices, the COTO establishes an implementation date. It communicates this in advance to members and applicants through various means. This helps mitigate
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	<p>disadvantage to applications already in process and allows the COTO to prepare for any necessary changes to processes, tools, forms, website, etc.</p> <ul style="list-style-type: none"> • Decisions of the Registration Committee are communicated to applicants in writing. The letter identifies: the composition of the review panel, the matter considered, documents reviewed, applicant submissions, pertinent dates, the decision, reasons for the decision (with reference to applicable legislation), and information about review and appeal.
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Objectivity

- Designing criteria and procedures that are reliable and valid
- Monitoring and following up threats to validity and reliability

Assessment Outcome	<p>Objectivity</p> <p>A process or decision is objective if it is based on formal systems, such as criteria, tools, and procedures that have been repeatedly tested during their development, administration and review and have been found to be valid and reliable. In the regulatory context, objectivity of systems encompasses the following:</p> <ul style="list-style-type: none"> • Reliability: ensuring that the criteria, training, tools and procedures deliver consistent decision outcomes regardless of who makes the decision, when the decision is made, and in whatever context the decision is made • Validity: ensuring that the criteria, training, tools and procedures measure what they intend to <p>The College informs the OFC that the College is a member of The Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) and the Federation of Health Regulatory Colleges of Ontario (FHRCO).</p> <p>The mission of ACOTRO is to advance quality occupational therapy regulation in Canada. ACOTRO does this by promoting the best regulatory practices, enhancing public accountability, building consistency of registration requirements and processes nationally, and responding to changes in the practice and regulatory environments.</p> <p>FHRCO provides strategic direction for health regulatory colleges in Ontario. They achieve this by working collaboratively on shared initiatives, delivering education to staff, council and committee members, communicating the role of regulatory colleges to the public, sharing regulatory expertise, and more.</p> <p>The College informs the OFC that the tools used throughout the SEAS process has been tested for reliability and validity.</p>
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Suggestion for Continuous Improvement	<ul style="list-style-type: none"> College council has been working toward the approval of the Common Competency Document to be used in Canada for educating, regulating entry-to-practices and for examination purposes. It establishes a single set of competencies across the country aiming to increase the standards of service delivery by the Occupational Therapists. <p>The College informs the OFC that the project is still in the very early stages. At this point, College Council has expressed support to work towards a common competency document for use in Canada for education, regulation and entry-to-practice examination purposes. The College will ensure the OFC is included on the list for stakeholder feedback as appropriate.</p>
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Impartiality

- Identifying bias, monitoring, and taking corrective action
- Implementing strategies

Assessment Outcome	<p>A process or decision is impartial if the position from which it is undertaken is neutral. Neutrality occurs when actions or behaviours that may result in subjective assessments or decisions are mitigated. Impartiality may be achieved by ensuring that all sources of bias are identified and that steps are taken to address those biases. In the regulatory context, impartiality encompasses the following:</p> <ul style="list-style-type: none"> Identification: having systems to identify potential sources of bias in the assessment or decision-making process (for example, sources of conflict of interest, preconceived notions, and lack of understanding of issues related to diversity). Strategies: having systems to address bias and enable neutrality during the assessment and decision making process (for example, training policies that address conflict of interest, procedures to follow if bias is identified, and using group deliberation and consensus strategies to come to decisions) <p>Identification:</p> <p>The COTO takes measures to identify sources of bias in the assessment of qualifications and final registration decision-making, including:</p> <ul style="list-style-type: none"> outlining expectations of staff, Registration Committee and Council members regarding actual, potential and perceived conflict of interest in a formal policy; requiring Council members to sign a disclosure document at the beginning of each year; requiring Registration Committee members to declare any conflict of interest at each Committee meeting; and Where a conflict of interest arises, the affected individual leaves the room and
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	<p>refrains from the discussion and decision-making.</p> <ul style="list-style-type: none"> Registration staff have undergone training in diversity and inclusion through the Managing Cultural Differences workshops offered by the Ontario Regulators for Access Consortium (ORAC). College staff have received training on the Ontario Human Rights Code. The Registration Committee undergoes annual training on the Ontario Human Rights Code. The title of the Policy is Accommodation Requests in the Registration Process. The policy is available on the College website.
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Fairness

- Ensuring substantive fairness
- Ensuring procedural fairness
- Ensuring relational fairness

<p>Assessment Outcome</p>	<p>A process or decision is considered fair in the regulatory context when all of the following are demonstrated:</p> <ul style="list-style-type: none"> • Substantive fairness: ensuring fairness of the decision itself. The decision itself must be fair and to be fair it must meet pre-determined and defensible criteria. The decision must be reasonable and the reasoning behind the decision must be understandable to the people affected. <p>Each COTO applicant must meet the same requirements and are considered on the same basis, meaning on their qualifications, regardless of where they may have been educated. This helps ensure that all applicants are treated in the same manner and that no advantage or disadvantage is conferred on a particular group (e.g., internationally educated versus domestically educated).</p> <ul style="list-style-type: none"> • Procedural fairness: ensuring fairness of the decision-making process. There is a structure in place to ensure that fairness is embedded in the steps to be followed before, during and after decisions are made. The structure ensures that the process is timely and that individuals have equal opportunity to participate in the registration process and demonstrate their ability to practice. <p>A number of steps are taken to promote procedural fairness by the COTO, including: The COTO by-laws and the Registration Committee Manual (formally known as Registration Committee Policy Manual) which outlines all committee procedures. The proceedings of meetings are recorded and verified for accuracy. Written records are made available to the Registrar once signed by the presiding and recording officer (COTO staff member). Meeting minutes are made available to the Registration Committee, each decision includes the names of panel members, the reason for the referral, the documents reviewed by the panel, the decision-making framework that sets out decision making criteria for consideration and lists all possible outcomes. A</p>
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	<p>written annual report of the Registration Committee is submitted to Council. Each Registration Committee decision must include that rationale for the decision, the decision making criteria and possible outcomes. In 2008, legal counsel conducted a legal audit of the Registration Committee's processes to provide an external, objective view of the legal aspects of the Registration Committee's function. All audit recommendations were implemented. The COTO has clear policies that include objective decision-making criteria.</p> <p>The COTO also demonstrates good practices designed to streamline and expedite the registration process. For example, applicants can complete and monitor their application online. Applicants can complete the majority of the application process from outside Canada, with the exception of the competency assessment of SEAS and the National Occupational Therapy Certification Examination.</p> <ul style="list-style-type: none"> • Relational fairness: ensuring people are treated fairly during the decision making process and by considering and addressing their perception about the process and decision. <p>The COTO has an Accessible Customer Service Policy that complies with the <i>Accessibility for Ontarians with Disabilities Act</i>. "Customers" include all individuals, including applicants, who come into contact with and/or seek services from the COTO. COTO staff are trained on how to relate to people with disabilities. For example, COTO provides information to its "customers" in the way that best suits their communication needs. For example, COTO premises are also accessible and barrier-free.</p> <p>Commendable Practice:</p> <ul style="list-style-type: none"> • The College approved the Determining Suitability to Practice as part of their Registration Policy which describes the process that the College uses to evaluate information about the applicants' suitability to practice. It also identifies the criteria that the College uses when conducting an evaluation. • The Introduction of Vulnerable Sector Check is a commendable practice that has been introduced, as part of the registration requirement aiming to protect the well-being of the public.
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Background

Assessment Methods

Assessments are based on the [Registration Practices Assessment Guide: For Regulated Professions and Health Regulatory Colleges](#). The guide presents registration practices relating to the specific duties and general duty in the fair access legislation.

A regulatory body's practices can be measured against the fair access legislation's specific duties in a straightforward way. However, the general duty is broad, and the principles it mentions (transparency, objectivity, impartiality and fairness) are not defined in the legislation.

As a result, the specific-duty and general-duty obligations are assessed differently (see the [Strategy for Continuous Improvement](#)).

Specific Duties

The OFC can clearly determine whether a regulatory body demonstrates the specific-duty practices in the assessment guide. Therefore, for each specific-duty practice, the OFC provides one of the following assessment outcomes:

- Demonstrated – all required elements of the practice are present or addressed
- Partially Demonstrated – some but not all required elements are present or addressed
- Not Demonstrated – none of the required elements are present or addressed
- Not Applicable – this practice does not apply to the (*acronym of regulatory body*)'s registration practices

General Duty

Because there are many ways that a regulatory body can demonstrate that its practices, overall, are meeting the principles of the general duty, the OFC makes assessment *comments* for the general duty, rather than identifying assessment outcomes. For the same reason, assessment comments are made by principle, rather than by practice.

For information about the OFC's interpretations of the general-duty principles and the practices that the OFC uses as a guideline for assessment, see [the OFC's website](#).

Commendable Practices and Recommendations

Where applicable, the OFC identifies commendable practices or recommendations for improvement related to the specific duties and general duty.

Sources

Assessment outcomes, comments, and commendable practices and recommendations are based on information provided by the regulatory body. The OFC relies on the accuracy of this information to

produce the assessment report. The OFC compiles registration information from sources such as the following:

- Fair Registration Practices Reports, audits, Entry-to-Practice Review Reports, annual meetings
- the regulatory body's:
 - website
 - policies, procedures, guidelines and related documentation templates for communication with applicants
 - regulations and bylaws
 - internal auditing and reporting mechanisms
 - third-party agreements and related monitoring or reporting documentation
 - qualifications assessments and related documentation
- targeted questions/requests for evidence that the regulatory body demonstrates a practice or principle

For more information about the assessment cycle, assessment process, and legislative obligations, see the [Strategy for Continuous Improvement](#).