

# Fair Registration Practices Report

## Occupational Therapists (2018)

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 regulators in Canada.

SEAS has now been in place for over three years, and over 100 competency assessments have been administered. In 2018 SEAS embarked on evaluation of the system and initiated an item analysis of the competency assessment tool. Following the item analysis, the competency assessment (CA) tool was revised and the cut scores were recalibrated.

In 2019, SEAS is planning an item analysis of the Jurisprudence Knowledge Assessment Test.

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

Applicants continue to be assessed using a fair, valid and reliable tool. The recalibrated cut scores better identify applicants who have gaps in their education and require additional training prior to being deemed substantially equivalent. This is of benefit to the applicant because it will better prepare them for other components of the entry to practice, for example, the entry to practice examination.

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

Applicants continue to be assessed using a fair, valid and reliable tool. The recalibrated cut scores better identify applicants who have gaps in their education and require additional training prior to being deemed substantially equivalent.

**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.**

Effective May 1, 2018 to cost of the Substantial Equivalency Assessment System (SEAS) increased 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

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. 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. SEAS provided applicants with six months notice of the fee increase to adequately prepare them for the increase. Applicant's who applied prior to May 1, 2018 were given the option of prepaying the remainder of their fees prior to the increase.

The College and SEAS continue to refer applicants to funding options available through the Internationally Trained Worker Loan Program (<https://www.accesscentre.ca/loan-program/>) and Windmill Microlending, formerly the Immigrant Access Fund (<https://windmillmicrolending.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.

There were amendments to four policies:

**Education and Fieldwork – Internationally Educated**

The amendments clarify that internationally educated occupational therapists (IEOTs) who had their academic qualifications assessed as being equivalent under the assessment process prior to SEAS (and were previously issued a general certificate of registration by the College), would be deemed to have met the education requirement for the purposes of re-registration with the College.

**Education and Fieldwork – Applicants with Canadian Education**

The amendments clarify that Canadian occupational therapy education programs accredited by the Canadian Association of Occupational Therapists (CAOT) are deemed by the Registration Committee to be equivalent to a Bachelor of Science degree or Master of Science degree in occupational therapy obtained in Ontario.

**Access to Records**

The amendments included minor updates to legislative references and currency of language.

**Currency – Initial Applicants**

The amendments permit the College to consider IEOTs currency hours at the date of application to the Substantial Equivalency Assessment System (SEAS), rather than the date of application to the College. This is only permitted in cases where the applicant completes the SEAS process and applies to the College within one year of their application to SEAS. In all other cases, the applicant will be referred to the Registration Committee for review. In reviewing the cases, the Committee will keep in mind the College's obligation to protect the public and ensure that applicants possess current knowledge, skills and judgement in order to provide the public with safe, effective and

ethical care. This policy decision ensures fairness to IEOTs, and it does not conflict with the registration regulation or the non-exemptible aspect of the currency requirement.

There were updates to two College documents impacting applicants, internationally and domestically trained. Updates as follows:

### **Supervision of Provisional Occupational Therapists**

There were changes to the documents associated with the provisional supervision process. The changes are intended to clarify expectations of supervisors and improve the quality of supervision of provisional occupational therapists.

### **Regulatory History Forms**

The Regulatory History form was updated to better reflect the information the College requires to adequately assess whether an applicant meets the registration requirements, particularly, the suitability to practise requirement. The new form requires the same information from other regulators that the College makes publicly available about its registrants. In addition, the new form was made generic, this will facilitate obtaining information from any regulatory organization, not just occupational therapist regulators.

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

In addition to the information noted above, the revised policies and documents 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, transparent, impartial and fair.

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

Registration policies and documents 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.**

The College developed and launched a video aimed at internationally educated occupational therapists who are interested in applying to the College. The video shares information about the requirements and process to register with the College ([https://www.youtube.com/watch?time\\_continue=1&v=Y9VPP1XI7lg](https://www.youtube.com/watch?time_continue=1&v=Y9VPP1XI7lg)).

### **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.**

The College is able to share information with applicants and other third-parties (e.g. HealthForceOntario) in a variety of ways.

## **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 and 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

**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	46

**Female** 466  
**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**                              503  
**Female**                            5711  
**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<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
430	52	10	Australia 3 India 9 Ireland 1 Iran 2 Philippines 2 S. Africa 2 U.K. 1 Total 20	0	512

<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:**

**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 education<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
461	54	11	Australia 7 India 5	0	553

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Ireland 1		
			Philippines 3		
			S. Africa 2		
			U.K. 7		
			Brazil 1		
			Portugal 1		
			Total 27		

<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:**

**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 International	Unknown	Total
			Australia 35		
			Brazil 8		
			China 1		
			Colombia 5		
			France 1		
			Germany 7		
			Hong Kong 27		
			India 93		
			Iran 14		
			Ireland 5		
			Israel 7		
5068	573	187	Japan 1	0	6214
			Jordan 5		
			New Zealand 6		
			Pakistan 11		
			Philippines 48		
			Portugal 1		
			Slovenia 1		
			S. Africa 18		
			Korea 1		
			Spain 1		
			Sri Lanka 1		
			Sweden 2		

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Taiwan, Province Of China 2 Thailand 1 U.K. 84 Total 386		

<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:**

### 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 Provinces	USA	Other International	Unknown	Total
<b>New applications received</b>	430	52	10	20	0	<b>512</b>
<b>Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)</b>	28	8	2	8	0	<b>46</b>
<b>Inactive applicants (applicants who had no contact with your organization in the reporting year)</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who met all requirements and were authorized to become members but did not become members</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who became FULLY registered members</b>	453	53	11	27	0	<b>544</b>
<b>Applicants who were authorized to receive an alternative class of licence<sup>3</sup> but were not issued a licence</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who were issued an alternative class of licence<sup>3</sup></b>	8	1	0	0	0	<b>9</b>

<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 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	<b>Description (a)</b>
		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	<b>Description (b)</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.
c)	Temporary practising certificate of registration	<b>Description (c)</b>
		<p>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:</p> <ul style="list-style-type: none"> <li>• A valid certificate of registration from another jurisdiction with education and clinical requirements equivalent to those of the College of Occupational Therapists of Ontario;</li> <li>• Have an offer of employment or appointment that</li> </ul>

- 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; and
- Meet the suitability to practise requirement.

**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 <sup>st</sup> to December 31 <sup>st</sup> 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	6	0	1	3	0	10
Applicants who initiated an appeal of a registration decision	1	0	0	1	0	2
Appeals heard	0	0	0	1	0	1
Registration decisions changed following an appeal	0	0	0	0	0	0

**Additional comments:**

1 decision was upheld following the appeal process.

1 appeal was withdrawn and not heard.

**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.

<b>Category</b>	<b>Staff</b>
<b>Total staff employed by the regulatory body</b>	24
<b>Staff involved in appeals process</b>	3
<b>Staff involved in registration process</b>	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:**

Heather Binkle

**Title:**

Deputy Registrar

**Date:**

2019/03/01

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