Currency Policy – Initial Applicants

Established: July 1998
Most recent revision: March 2018

Applicable Category of Registration:
1. General Practising Certificate
2. Provisional Practising Certificate

Type of Requirement: Non-exemptible

Applicable Sections of Registration Regulation: 36(1) and 37(1)
3. Where the applicant completes the requirements in paragraph 1 [education] and 2 [1000 hours of fieldwork or clinical practicum] more than 18 months before the date the application is made, evidence of one of the following must be provided,
   i. Completion of at least 600 hours of service within the scope of practice of the profession in the three years prior to the application date, or
   ii. Successful completion within the previous 18 months of a refresher program accepted by the Registration Committee.

Principles(s):
Recent graduation or recent practice within the scope of practice of the profession helps to ensure that applicants possess current knowledge, skills and judgement to provide the public with safe, effective and ethical care.

Additional registration requirements are required to be met pursuant to the registration regulation prior to a candidate initiating a refresher program, such as, successful completion of a College-approved examination, language fluency in English or French and demonstration that the applicant meets “Suitability to Practise” requirement (i.e., whether the applicant's previous conduct affords reasonable grounds for the belief that he or she will not practice occupational therapy safely and ethically).
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Decision Criteria

1. For the purposes of calculating currency hours, “the date the application is made” (subsection 36 (1) and 37 (1) paragraph 3) is generally considered to be the date on which the applicant submits to the College a completed application form and payment of the application fee.

2. However, where the applicant completed the Substantial Equivalency Assessment System (SEAS), the College will consider the applicant’s currency hours at the date of application to SEAS, as long as the applicant completes the SEAS process within one year of their application to SEAS. Specific situations such as completion of additional training or education as part of SEAS, SEAS application extensions granted beyond the one-year SEAS application period, or applications received by the College more than one year from the date of application to SEAS, will be considered on a case-by-case basis by the Registration Committee. In reviewing the cases, the Committee will keep in mind the College’s obligation to protect the public and ensure that registrants possess current knowledge, skills and judgement in order to provide the public with safe, effective and ethical care.

3. Applicants whose currency hours fall below the minimum requirements can submit an Additional Currency Data Sheet, which details all of their activities within the scope of practice of occupational therapy for the applicable period. As a general rule, the number of non-paid professional activity hours accepted by the College cannot exceed 25% of the applicant’s hours, as those hours usually do not have the same level of accountability and responsibility as paid employment. In addition, informal activities that do not have the formal, structured components of occupational therapy practice will not be considered hours of service within the scope of practice of the profession.

4. Applicants who have insufficient currency hours are required to successfully complete a refresher program accepted by the Registration Committee.

New Graduates

5. New graduates will be considered to have met the currency requirement for 18 months post-graduation. Once registered, these individuals will have three years from the date of registration before their practice hours will be reviewed – at that time they will have had to complete at least 600 hours of service within the previous three years. If the new graduate does not initiate an occupational therapy practice within this 18-month period, a refresher program must be completed.
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6. New graduates who have not registered with the College and initiated practice within 18 months of graduation [but less than three years after graduation] are generally required to complete a 150-hour refresher program (the equivalent of four weeks).

7. New graduates who have not registered with the College and initiated practice within 18 months of graduation [but less than four years after graduation] are generally required to complete a 225-hour refresher program (the equivalent of six weeks).

8. New graduates who have not registered with the College and initiated practice within 18 months of graduation [but less than five years after graduation] are generally required to complete a 300-hour refresher program (the equivalent of eight weeks).

Applicants Other Than New Graduates

9. Applicants whose currency hours are at least two thirds of the required hours (i.e. 400 hours in the three years preceding application to the College) are generally required to:
   a. review and successfully complete all current College Prescribed Regulatory Education Program (PREP) Modules,
   b. review the College Standards and write a reflection paper detailing her/his understanding of how the Standards apply to her/his own practice to the satisfaction of the Registrar,
   c. submit the PREP Module answer sheets and reflection paper to the attention of the Registrar within six months of being notified of the re-entry requirements.

10. Applicants whose currency hours are less than two thirds of the required hours, but not zero hours, in the three years preceding the application to the College, are generally required to successfully complete a 150-hour refresher program (the equivalent of four weeks) within six months of the applicant being notified of their re-entry requirements.

11. Applicants who have practiced some hours as an occupational therapist in the four years preceding application to the College are generally required to successfully complete a 225-hour refresher program (the equivalent of six weeks) within six months of the applicant being notified of their re-entry requirements.

12. Applicants who have practiced some hours as an occupational therapist in the five years preceding application to the College are generally required to successfully complete a 300-hour refresher program (the equivalent of eight weeks) within six months of the applicant being notified of their re-entry requirements.
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13. Applicants who have practiced some hours as an occupational therapist in the six years preceding application to the College are generally required to successfully complete a 375-hour refresher program (the equivalent of 10 weeks) within one year of the applicant being notified of their re-entry requirements.

14. Applicants who have practiced some hours as an occupational therapist in the eight years preceding application to the College are generally required to successfully complete a 450-hour refresher program (the equivalent of 12 weeks) within one year of the applicant being notified of their re-entry requirements.

15. Applicants who have practiced some hours as an occupational therapist in the nine years preceding application to the College are generally required to successfully complete a 525-hour refresher program (the equivalent of 14 weeks) one year of the applicant being notified of their re-entry requirements.

16. Applicants who have practiced some hours as an occupational therapist in the ten years preceding application to the College are generally required to successfully complete a 600-hour refresher program (the equivalent of 16 weeks) within one year of the applicant being notified of their re-entry requirements.

17. Applicants who have not practiced as an occupational therapist within the 10 years preceding application to the College are generally required to successfully complete a 600-hour refresher program (the equivalent of 16 weeks full time practice) within one year of the applicant being notified of their re-entry requirements. These candidates must also successfully complete the College approved examination as part of the evaluative component of the refresher program. Where successful completion of the refresher program is completed prior to completion of the College exam requirement, the applicant can apply for a provisional practising certificate of registration. The Registration Committee may require applicants who have not practiced as an occupational therapist within the 10 years preceding application to the College to successfully complete a College approved examination prior to initiating the refresher program; this includes applicants who have previously passed an approved examination.
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Extensions
18. Applicants who cannot meet the requirements within the specified timeline may make a request in writing to the Registrar for an extension of time in which to meet the requirement. Reasons must be provided. In exceptional circumstances an extension may be granted.

Ongoing Currency Requirement
19. Once the applicant meets the currency requirement for a general or provisional practising certificate of registration he or she will submit the required documentation to the College. These applicants will be considered to meet the currency requirements for a period of 18 months after completion of the refresher program. Once registered, these individuals will have three years from the date of registration to have completed 600 practice hours or will be required to successfully complete a further refresher program.

Refresher Program
20. The College’s “Clinical Re-Entry Program” is the refresher program accepted by the Registration Committee (pursuant to 36(1)3.iii of the Registration Regulation) for those applicants who intend to engage in clinical practice or mixed practice. This program involves non-paid supervised clinical practice and includes a learning contract and a practice supervisor agreement form; both must be submitted to the College for approval before the applicant begins the program. The supervisor must be a registrant who holds a general practising certificate of registration with the College with at least three years of practice experience and meet the requirements set out in College policy on Approval of Supervisors and Other Agents of the College. It is recommended that the applicant complete the College’s Self-Assessment Evaluation before beginning the Clinical Re-Entry Program. For more information on the Clinical Re-Entry Program please contact the College.

21. The College’s “Non-Clinical Re-Entry Program” is the refresher program accepted by the Registration Committee for those applicants who intend to practice in a strictly non-clinical role. The program involves a program placement or project, reflective practice exercises, multi-source feedback surveys, a Jurisprudence Knowledge Assessment Test (JKAT), letters of attestation, a learning contract and a Program Advisor. Applicants who engage in the Non-Clinical Re-Entry Program will have limitations placed on their certificate of registration, when registered, restricting their practice to non-clinical. These registrants will not be allowed to provide occupational therapy services to clients (patients). The limitation will be placed on the registrant’s certificate of registration until he/she completes the College’s Clinical Re-Entry Program.
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Program (see paragraph 18). All terms, conditions or limitations placed on a certificate of registration must be displayed on the College’s public register (OT Directory).

22. With respect to sequencing completion of requirements, the College requires applicants who do not meet the Good Conduct requirement (in 35(1) 4 of the Registration Regulation) at the time of application to undergo a Conduct Review prior to initiating the refresher program.

23. Should an applicant’s conduct during the course of the refresher program result in the Registrar having doubts on reasonable grounds for the belief that he or she will not practise occupational therapy safely and ethically, the applicant will be referred to the Registration Committee under paragraph 35(1) 4 of the regulation.

An Applicant may meet the Currency Requirement by:
1. Providing evidence by signing the declaration statement on the initial application form and, if requested, providing adequate documentation of worked hours and paid hours that meet the requirement; or

2. Successfully completing a refresher program as directed by the Registrar; or

3. Providing other evidence, satisfactory to the Registrar of meeting the requirement.

Possible Outcomes:
1. An applicant who can provide evidence to satisfy the Registrar will be considered to have met the currency requirement.

2. Any applicant who cannot provide sufficient evidence of currency will be required to complete a refresher program or have their application reviewed by a Panel of the Registration Committee. The Registrar will assist the applicant in determining the exact length of a refresher program contemplated by the guidelines provided by the Registration Committee.

3. Any applicant who has not successfully completed the specified hours or a refresher program will be deemed to not meet the currency requirement.