



## INSUFFICIENT AND/OR INADEQUATE DOCUMENTATION

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**Established:** May 2009, October 2011

**Most recent revision:** March 2015

**Applicable Categories of Registration:**

1. General Practising Certificate
2. Provisional Practising Certificate
3. Temporary Certificate

**Type of Requirement:** Applies to exemptible and non-exemptible requirements.

**Applicable Regulation:**

This policy is most relevant to the education and fieldwork, currency, or conduct requirements of registration.

**Principle(s):**

Extremely exceptional circumstances, which may include but are not limited to: war; natural disaster; or political persecution, may render it difficult or impossible for an applicant to obtain sufficient original documentation to support his/her application for registration. An applicant who can provide persuasive evidence that he/she has tried and been unsuccessful in obtaining required documentation may provide alternative evidence to third-party assessment agencies or ask the Registration Committee to consider alternative evidence to meet a requirement.

**Note:**

As of May 1, 2015 internationally-educated applicants will be 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).

Both WES and ACOTRO have adopted policies regarding the provision of documentation that are consistent with this policy. For more information regarding WES and ACOTRO SEAS policies, please see: [www.wes.org/ca/](http://www.wes.org/ca/) or [www.acotro-acore.org/](http://www.acotro-acore.org/).

**Decision Criteria**

1. If documentation required as part of the SEAS process is unavailable from its original source, the applicant must communicate directly with the third party service provider (WES or ACOTRO) and follow the process outlined in their policies.



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2. Once an applicant has completed the SEAS process, he/she will be required to provide a SEAS Disposition Report as part of his/her application for registration with the College. At that point the College will require applicants to provide documentation related to provincial regulatory requirements. If documentation regarding these requirements of registration is unavailable from its original source, the application will be referred to the Registration Committee for review. The applicant may be requested to provide:
  - a. persuasive evidence regarding why they cannot obtain sufficient or adequate documentation from original sources to meet the registration requirements; and
  - b. alternative documentation/evidence to meet the requirement(s).

Alternative evidence that may be considered by the Registration Committee will be adapted to the individual circumstances of the applicant includes, but is not limited to an appropriate combination of the following:

- Copies of documents from the applicant or other available resources;
- Signed affidavits attesting to requirements completed;
- Professional portfolio;
- Documentary evidence from an instructor(s) or employer(s);
- Education and fieldwork reference(s) and or academic referee(s);
- Interviews, including by registrants with the same background as the applicant;
- Peer assessment(s);
- Prior learning or other skills/competency assessment(s).

Documentation required as part of the application for registration with the College should ideally be provided from the original source(s) directly to the College, but all evidence the applicant is able to provide will be considered.

An applicant may meet the requirement by:

1. Providing sufficient evidence to satisfy the Registration Committee that:
  - a. original documentation could not be obtained; and
  - b. the applicant has met the requirement(s) that would otherwise be demonstrated by the original documentation which could not be obtained.



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#### Possible Outcomes:

1. If the Committee is satisfied that:
  - a. an applicant has made efforts and can provide persuasive evidence that original documentation cannot be provided, and
  - b. alternative information provided supports that the applicant has met the requirement(s) he/she may be deemed to have met one or more of the requirements.
  
2. If the Committee:
  - a. is satisfied that an applicant has made efforts and can provide persuasive evidence that original documentation cannot be provided; but
  - b. is not satisfied that alternative information provided supports that the applicant has met the requirement(s) he/she may be directed to:
    - provide additional information; or
    - undertake additional education; or
    - undertake a supervised period of practice (for exemptible requirements); or
    - provide, as directed by the Committee, other evidence to satisfy the Committee that he/she has met the requirement.
  
3. If the Committee is not satisfied that:
  - a. that an applicant has made efforts and can provide persuasive evidence that original documentation cannot be provided, he/she may be requested to make additional efforts and, if he/she does not do so, he/she may be deemed to have not met one or more requirements.