Currency Requirement for Annual Renewal

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| **Section:** | Registration |
| **Applies to:** | Occupational therapists holding a general certificate of registration |
| **Approved by**: | Registration Committee |
| **Date Established:** | July 1998 |
| **Date Revised:** | July 2001, January 2002, March 2003, May 2003, November 2007, October 2011, March 2012, March 2014, September 2021 |

# Purpose

This policy describes how the College oversees the currency requirement for occupational therapists to maintain a general certificate of registration.

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# Principles

Recent practice in their profession is one of the ways that occupational therapists show they possess the current knowledge, skills, and judgment to provide safe, effective, and ethical care.

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# Policy

At annual renewal, occupational therapists must declare whether they meet the currency requirement. The currency requirement is 600 hours of practice within the scope of the profession in the past three years, or successful completion of a College-approved refresher program in the past 18-months.

Occupational therapists who do not meet the currency requirement must undergo a review by the Registrar.

# Process for the Registrar’s review

Occupational therapists who have not met the currency requirement receive a notice from the College asking for detailed information about their practice history. They have 15 days to respond.

After reviewing the information submitted by the occupational therapist, the Registrar will make a decision and notify them within 30 days.

## Decision criteria

## What counts as practice hours

Practice hours may include clinical and/or non-clinical work as outlined in the [Essential](https://www.coto.org/docs/default-source/essential-competencies/3rd-essential-competencies_ii_may-2011.pdf?sfvrsn=2) [Competencies of Practice For Occupational Therapists in Canada](https://www.coto.org/docs/default-source/essential-competencies/3rd-essential-competencies_ii_may-2011.pdf?sfvrsn=2).

The College will consider hours spent in other activities that support continuing competence and the delivery of safe, effective and ethical care. These unpaid professional activity hours (such as professional development or participation in other unpaid professional activities) cannot be more than 25% of the occupational therapists declared hours. However, practice hours and unpaid professional activity hours will only be accepted if they were obtained while the individual held a certificate of registration to practise as an occupational therapist.

**Occupational therapists who have close to the required practice hours**

If an occupational therapist can show that they are likely to make up their required practice hours within six months of the annual renewal deadline, the Registrar can decide to provide an extension. The Registrar may attach conditions to the extension, for example requiring the occupational therapist to sign an undertaking or requesting confirmation of completed practice hours from their employer.

After the occupational therapist has obtained the outstanding practice hours, and provided they meet all other conditions of registration, the College will consider the occupational therapist to have met the currency requirement for the renewal period.

**Occupational therapists who have two-thirds or more of the required practice hours**

If an occupational therapist has 400 or more practice hours in the previous three years, but will not have 600 within six months, the Registrar can impose conditions on the occupational therapist’s certificate of registration, such as the following, pursuant to s. 41 of the Registration Regulation:

* restrict their use of the title occupational therapist to their current job
* require them to complete a refresher program (supervised practice) of 150 hours
* impose a deadline to complete the program
* require submission of a College-approved evaluation form, completed by their supervisor attesting to successful completion of the program.

After meeting the imposed conditions, and provided they meet all other conditions of registration, the College will consider the occupational therapist to have met the currency requirement for the renewal period.

**Occupational therapists who have fewer than 400 practice hours**

If an occupational therapist has less than 400 practice hours in the previous three years, the Registrar can impose conditions on the occupational therapist’s certificate of registration, such as the following pursuant to s. 41 of the Registration Regulation:

* restrict their use of the title occupational therapist to their current job
* require them to complete a refresher program (supervised practice) of 300 hours
* impose a deadline to complete the program
* require submission of a College-approved evaluation form, completed by their supervisor attesting to successful completion of the program.

After meeting the imposed conditions, and provided they meet all other conditions of registration, the College will consider the occupational therapist to have met the currency requirement for the renewal period.

**Granting extensions**

If an occupational therapist is unable to meet any deadline imposed by the Registrar, and has valid reasons for the delay, they can write to the Registrar asking for an extension.

**Revoking an OT’s registration certificate**

The Registrar may revoke an occupational therapist’s certificate of registration if they refuse to comply with conditions the Registrar imposed after the review.

In such cases, the occupational therapist may be required to complete a refresher program to be eligible for a new certificate of registration.

# Legal requirement

# [Ontario Regulation 226/96: General, s. 36.(4),(5) and s. 41 under the Occupational Therapy Act, 1991](https://www.ontario.ca/laws/regulation/960226)