

## Currency Requirements for Applicants

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<b>Section:</b>	Registration
<b>Applies to:</b>	Applicants for general and provisional certificates of registration
<b>Approved by:</b>	Registration Committee
<b>Date Established:</b>	August 1998 as Registration Policy: Currency Requirements for Applicants
<b>Date Revised:</b>	July 2001, January 2002, March 2003, May 2003, November 2007, March 2011, October 2011, March 2012, March 2014, February 2016, September 2021, January 2025

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### Purpose

This policy explains how applicants to the College can meet the currency or Refresher program requirements.

### Principles

The College requires applicants to have current knowledge, skills and judgement in occupational therapy practice to provide safe, effective and ethical care.

### Definitions

**Currency:** Service the applicant has completed within the scope of practice of the profession to maintain or current knowledge, skills and abilities. Currency is measured in hours.

**Refresher Program:** Required professional development and learning activities to support successful transition to practice which can include supervised practice to gain currency; a learning contract; Quality Assurance Competency Assessment, and successful completion of the National Occupational Therapy Certification Exam.

### Policy

#### Currency and Hours of Practice

Applicants who have graduated from a College-approved occupational therapy program within the 18 months of applying for registration are deemed to meet the currency requirement for hours of practice.

If 18 months or more have elapsed since an applicant graduated from an approved occupational therapy program, they must prove to the College that:

1. They have completed at least 600 hours of service within the scope of

practice of the profession within the last three years, or

2. They have successfully completed an approved refresher program within the previous 18 months.

Appendix 1 to this policy sets out the parameters an approved refresher program based on currency or date of graduation.

*Currency hours of practice for applicants currently registered in Canada outside of Ontario and applying through the labour mobility provisions is confirmed by the current regulatory organization.*

*Currency hours of practice for applicants who are international graduates can be confirmed through certification by employer or key advisor or mentor in country of practice when a regulatory organization does not exist.*

### **Provisional Certificate to Maintain or Acquire Currency:**

#### **Canadian Graduates**

1. The College receives confirmation from Canadian universities about eligibility to graduate. This is considered proof until the new graduate applicant's final transcript is available.
2. Once the applicant has convocated, they must request their university send a copy of the final transcript directly to the College.
3. Having graduated, Graduates can choose to apply for a provisional registration to maintain their currency while preparing for National Occupational Therapy Certification Exam (NOTCE).
4. To be eligible for provisional registration, applicants must:
  - a. be registered for the next available sitting of the National Occupational Therapy Certification Exam (NOTCE)
  - b. have an offer of employment where they will be supervised by an occupational therapist who has held general registration for at least one year.
  - c. submit a completed Provisional Registration Supervision Agreement
  - d. if being **supervised virtually**, submit a **Provisional Registration Supervision Plan** with the Supervision Agreement.
  - e. successfully complete the examination within the specified timeframe.
  - f. meet all other registration requirements

## International Graduates

5. The College has an agreement with the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) to administer a substantial Equivalency Assessment System (SEAS) to determine eligibility to register to practice occupational therapy in Canada.
6. The international graduate indicates to SEAS that they are applying to practice in Ontario.
7. The College receives confirmation from SEAS that the international graduate is eligible to register.
8. Applicants can choose to apply for a provisional registration to maintain their currency while preparing for National Occupational Therapy Certification Exam (NOTCE).
9. To be eligible for provisional registration, applicants must:
  - a. be registered for the next available sitting of the National Occupational Therapy Certification Exam (NOTCE)
  - b. have an offer of employment where they will be supervised by an occupational therapist who has held general registration for at least one year.
  - c. submit a completed Provisional Registration Supervision Agreement
  - d. if being **supervised virtually**, submit a **Provisional Registration Supervision Plan** with the Supervision Agreement.
  - e. successfully complete the examination within the specified timeframe.
  - f. meet all other registration requirements

## Temporary Certificate to Acquire Currency for Re-Entry to Practice

With very limited exceptions, unpaid placements are prohibited by the Ontario *Employment Standards Act, 2000*. As such, applicants returning to practice, who have met all the requirements of registration except for currency hours may register for a Temporary Certificate of Registration (to increase the likelihood of finding paid employment during their placement).

To be eligible for temporary registration to meet the currency requirement, applicants must:

- Meet the language fluency, examination, suitability to practise, professional liability and work eligibility requirements; and
- Have an occupational therapist who has been a general registrant in Ontario for a least one year who agrees to supervise and be responsible for ensuring provision of appropriate care for clients

The requirement (in clause 38(1)1 of the registration regulation) to be registered as an Occupational Therapist in another jurisdiction will be exempted.

Registrants holding a temporary certificate to meet the currency requirement will be:

- Registered with the College and appear on its public register with a limitation which states they must practice under supervision.
- Entitled to use the title “occupational therapist” or “OT” and designation OT Reg. (Ont.).

The temporary certificate is time limited to the duration of the refresher program but is not to exceed more than 6 months in a 12-month period.

If the temporarily registered OT successfully completes the refresher program, they can apply for a General Certificate of registration and if granted, supervision is no longer required.

An applicant who chooses not to obtain the temporary certificate, is not issued a certificate of registration by the College and cannot use any of the protected titles.

## **Procedure:**

### **Registration Competency Assessment for Entry and Re-Entry to Practice**

1. Having established language fluency and suitability to practice, the applicant returning to practice, completes the Registration Competency Assessment.
2. New Graduates and International Graduates who have completed SEAS within last 18 months are not subject to a Registration Competency Assessment during the application process.

### **Application Currency Declaration**

1. Applicants must declare in their application, and provide proof, as to whether they meet the currency requirement.
2. For applicants who have graduated within the last 18 months, proof would be an official transcript from their educational program. If the official transcript is not yet available, the College will accept a letter from the occupational therapy program. The letter must state the applicant has successfully completed the program and will graduate.
3. Applicants who graduated more than 18 months before applying for registration must submit proof, they have completed an acceptable refresher program in the last 18 months or 600 hours of service within the scope of practice of occupational therapy within the last three years. Proof could take the form of a letter from their employer or a record of employment.

4. Applicants who declare they do not meet the currency requirement will submit a completed **Additional Currency Data Sheet** [coto-additional-currency-data-sheet.pdf](#) to the College for review of all their activities within the scope of practice of occupational therapy within the last ten years
5. The College will review the information provided by the applicant and provide a ruling on currency.

## Currency Ruling

### What counts as currency hours

1. Practise as an occupational therapist while registered in another jurisdiction will generally count towards practice hours. Illegal practice as an occupational therapist (i.e., practising while not being registered in a jurisdiction where registration is required), will not count towards practice hours.
2. Practice hours may include clinical and/or non-clinical work as outlined in the Competencies for Occupational Therapists in Canada (2021).
3. 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 applicant's declared hours. Practice hours and unpaid professional activity hours will only be accepted if they were obtained while the applicant held a certificate of registration to practise as an occupational therapist.
4. The College calculates currency based on the date the applicant submits their completed application form/materials and payment of their application fee with reference to the guide in Appendix 1 for approved hours to be completed. (The SEAS process generally takes one year to complete. To accommodate for this, the College will calculate the "date of application for registration" for the purposes of counting currency hours by subtracting up to 12 months (based on the length of time the applicant spent in SEAS) from the date the applicant submits their completed application form/material and pays their fee to the College.)
5. The College will inform the applicant within 15 days submitting their completed application whether they meet the currency requirement.

## Supervised Practice

Supervised Practice involves practicing under the supervision of a registered Occupational Therapist to pursue currency hours and to complete a learning contract that outlines specific learning needs.

### Finding a supervisor and practice site:

The applicant is responsible for finding a practice site with a suitable supervisor in their chosen area of practice.

The supervisor shall:

- Hold a general certificate of registration with the College

- Have at least one year of practice experience
- Meet the requirements of the College’s policy on Approval of Supervisors and Other Agents of the College- See Appendix 2 for applicable excerpt.

A Learning Contract is developed by the applicant, in consultation with the practice supervisor, based on the learning needs identified in the Registration Competency Assessment and is submitted for approval within the first week of the practice period.

### **Completing a refresher program**

Appendix 1 to this policy describes the activities that are College-approved for completing re-entry to practice, based on the date of the applicant’s most recent practice hours.

### **After completing the refresher program**

Applicants who complete their refresher program must submit proof of completion to the Registrar within the required time frame. Documents and required timeframes are set out in Appendix 1.

If the Registrar has any reason to believe that an applicant has not successfully completed the refresher program, they will be referred to the Registration Committee.

### **Related policies**

[Approval of Supervisors and other agents of the College Determining Suitability to Practise at Registration \(8-72\)](#)

[Language Fluency - Requirement \(8-81\)](#)

[examination-requirement-8-60.pdf](#)

### **Legal Requirements**

[Ontario Regulation 226/96: General, s. 36\(1\) and 37\(1\), under the Occupational Therapy Act, 1991](#)

[Employment Standards Act, 2000, S.O. 2000, c. 41 | ontario.ca](#) 2023, c. 9, Sched. 29, s.

## Appendix 1

Note: The number of hours required to meet the currency requirement may be adjusted based on learning needs identified through the Registration Competency Assessment (if applicable).

Occupational Therapy Practice Hours	Approved Refresher Program
<b>(At least 400 hours in the past 3 years)</b>	<p><b>Annual E-Learning Modules:</b> review and successfully complete all current College Annual E-Learning Modules</p> <p><b>Standards Reflection:</b> review all current College Standards and write a reflection paper detailing individual understanding of the how the Standards apply to one's own practice to the satisfaction of the Registrar</p> <p><b>NOTE:</b> above requirements must be submitted to the Registrar within six months of being notified of the requirements</p>
<b>Less than 400 hours but not 0 hours in the last 3 years</b>	<p><b>Supervised Practice:</b> 150 hours of supervised practice within six months of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p>
<b>Some or 0 hours within the past 4 years</b>	<p><b>Supervised Practice:</b> 225 hours of supervised practice within six months of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p>
<b>Some or 0 hours within the past 5 years</b>	<p><b>Supervised Practice:</b> 300 hours of supervised practice within one year of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p> <p><b>Referral to Quality Assurance Competency Assessment:</b> Complete within 18 months</p>
<b>Some or 0 hours within the past 6-10 years</b>	<p><b>Supervised Practice:</b> 425 hours of supervised practice within one year of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p> <p><b>Referral to Quality Assurance Competency Assessment:</b> Complete within 18 months</p>

<b>Occupational Therapy Practice Hours</b>	<b>Approved Refresher Program</b>
<b>0 hours within the past 10 years or more (&gt;10)</b>	<p><b>Supervised Practice:</b> 600 hours of supervised practice within one year of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p> <p><b>Referral to Quality Assurance Competency Assessment:</b> Complete within 18 months</p> <p><b>National Occupational Therapy Certification Examination:</b> When approved by the Registration Committee</p>
<b>New Graduates</b>	
<b>0 hours less than 3 years out</b>	<p><b>Supervised Practice:</b> 150 hours of supervised practice within six months of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current College Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p>
<b>0 hours less than 4 years out</b>	<p><b>Supervised Practice:</b> 225 hours (the equivalent of 6 weeks full time) of supervised practice within six months of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current College Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p> <p><b>Referral to Quality Assurance Competency Assessment:</b> Complete within 18 months</p>
<b>0 hours less than 5 years out</b>	<p><b>Supervised Practice:</b> 600 hours (the equivalent of 16 weeks full time) of supervised practice within one year of being notified of the requirements</p> <p><b>Annual E-Learning Modules:</b> review and successfully complete all current Annual E-Learning Modules</p> <p><b>Learning Contract:</b> Completion of a learning contract based on Registration Competency Assessment</p> <p><b>Referral to Quality Assurance Competency Assessment:</b> Complete within 18 months</p>



**Appendix 2:** Based on *Excerpt from: Approval of Supervisors and Other Agents of the College*

Supervisor Eligibility: Registrants may be appointed in the role of agent. The list of roles for agents at the College, Registrant related decision outcomes and time periods after which a registrant is eligible to be appointed to fill each role are listed in the chart below:

Decision Outcome Relating to Registrant	Practice Supervisor, Monitors, or Mentors	Peer Assessor	Expert Opinion
<p><b>Current or ongoing proceeding:</b></p> <ul style="list-style-type: none"> <li>• College investigation relating to allegations of professional misconduct, incompetence or incapacity.</li> <li>• Referral to Discipline.</li> <li>• Referral to Fitness to Practice.</li> <li>• Referral for a health inquiry</li> </ul>	<b>Not Eligible</b>		
<p><b>Committee decision to:</b></p> <ul style="list-style-type: none"> <li>• Take No Action</li> <li>• Frivolous or Vexatious</li> <li>• Complaint Withdrawn</li> </ul>	<b>Eligible</b> No restrictions		
<ul style="list-style-type: none"> <li>• Administrative suspensions and revocations</li> <li>• Advice and Guidance</li> <li>• Written Caution</li> <li>• Terms, Conditions, Limitations for provisional or temporary certificate</li> <li>• Administrative Undertakings-Vulnerable Sector Checks ; Liability Insurance; Regulatory History</li> </ul>	<b>Low Risk</b> 1 Year		<b>High Risk</b> Indefinite
<ul style="list-style-type: none"> <li>• Undertakings by Quality Assurance(QA) or ICRC</li> <li>• Specified Continuing Education and Remedial / Remediation Program (SCERP) by QA or ICRC</li> <li>• Verbal Caution by ICRC</li> <li>• Terms, Conditions, Limitations other than for registration certification</li> </ul>	<b>Moderate Risk</b> 6 Years		

Decision Outcome Relating to Registrant	Practice Supervisor, Monitors, or Mentors	Peer Assessor	Expert Opinion
<ul style="list-style-type: none"> <li>• Suspensions by ICRC</li> <li>• Revocations with restrictions by ICRC</li> <li>• Terms, Conditions, Limitations by ICRC</li> <li>• Discipline Hearing with Findings</li> </ul>	<b>High Risk</b> Indefinite		