

College of OCCUPATIONAL THERAPISTS of Ontario

2024 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

Content

1. Background
2. Organization information
3. Registration requirements
4. Third party assessments
5. Accomplishments, risks and mitigations
6. Changes to registration practices
7. Membership and application data

Glossary of terms

1. Background

Under section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA), which is substantially similar to section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA).

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 22.9 of Schedule 2 of the RHPA and Section 23 of FARPACTA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its annual Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2024.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

2. Organization information

Organization name	College of OCCUPATIONAL THERAPISTS of Ontario
--------------------------	---

For questions about this report, please contact:

Name	Alex Kunovac
Job Title	Registration Manager
E-mail	akunovac@coto.org

3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of OCCUPATIONAL THERAPISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Occupational Therapist
Academic requirement	A Bachelor of Science degree or Master of Science in Occupational Therapy obtained in Ontario or an academic qualification considered equivalent by the College's Registration Committee. If you were educated outside of Canada, your education is reviewed by the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) to ensure that it is substantially equivalent to the content of an Ontario occupational therapy program.

Experience requirement	Successful completion of 1000 hours of fieldwork or clinical practicum as part of the education program. Graduation from an approved occupational therapy program within the past 18 months, or 600 hours of occupational therapy practice within the past 3 years, or Successful completion a College approved Refresher Program within the last 18 months.
Language requirement	Must be able to speak and write either English or French with reasonable fluency. Individuals whose first language is not English or French, or whose occupational therapy education was not in English or French, must provide evidence of fluency.
Additional information on licensing requirements (may include links to appropriate page on regulator website):	Successful completion of the Canadian Association of Occupational Therapists' National Occupational Therapy Certification Examination. The College must be satisfied that you will practice occupational therapy safely and ethically. This requirement includes submission of a current Vulnerable Sector (VS) Check - visit our VS Check webpage for full details Must be a Canadian citizen or a permanent resident of Canada, or be authorized under the Canadian Immigration and Refugee Protection Act, 2001 to engage in work as an occupational therapist.

4. Third party assessments

Third party organizations that assess qualifications on behalf of the regulator.

Organization name	Function
Canadian Association of Occupational Therapists	Knowledge based exam

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

College of OCCUPATIONAL THERAPISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

COTO has an administration agreement with the Canadian Association of Occupational Therapists to administer the National Occupational Therapy Certification Examination (NOTCE) to assess entry level competency for Occupational Therapists in Ontario. COTO receives examination results; and an operational and technical report with data related to service timelines, availability of exam seats, privacy, cyber-security, and the availability of an appeal mechanism after each exam and participates in an exam over-site meeting on a regular basis. Applicants provide feedback to our third-party which is summarized in the operational and technical report. The registrar meets regularly in partnership with CAOT and the Association of Canadian Occupational Therapy Regulatory Organizations to recommend improvements.

5. Accomplishments, risks and mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

1	1. Language Assessment Changes – Due to government requirements to use specific federal language tests for registration decisions, the College worked
---	---

	with ACOTRO and the College of Physiotherapy to implement use of a language assessment process intended to reduce barriers for those needing an assessment of their language skills to work safely in Canada. A new test was implemented in partnership with ACOTRO SEAS in 2024.
2	2. Remote practice memorandum of understanding – In 2023, COTO signed a memorandum of understanding with ACOTRO to support remote practice that uses virtual means to deliver service. This promotes appropriate services that are still accountable through regulation, without requiring registration in multiple jurisdictions. In 2024, occupational therapists registered in other Canadian jurisdictions were able to practice remotely with clients in Ontario without needing to also register in Ontario. ACOTRO worked together to both communicate and operationalize the memorandum.
3	3. Substantial Equivalency Assessment System – This is a national system to assess competencies of internationally educated occupational therapists (IEOTs). This program is closely monitored and supported by each province. COTO supports the system by working on the national oversight committee, managing the human resources of the program, and providing space for program staff. The work on this program ensures a consistent, high-quality assessment for IEOTs with appropriate follow up supports as necessary. This is critical to support health human resources to increase the numbers of competent occupational therapists across Canada. In 2024, ACOTRO applied for funding from the British Columbia government to fund some needed improvements to the program for efficiency. Funding started as of February 2025.

B. Risks and Mitigations

Risk	Mitigation Measure
Risk that the College does not support diversity and or inclusion and or equity	National Sociodemographic Data collection – Working with other provincial regulators, COTO will implement newly updated data collection for the Canadian Institute for Health Information (CIHI). In collaboration with ACOTRO, regulators have created a common pathway for collection of sociodemographic and

	<p>practice data. As a group, the regulators analyze national level data to help solve common regulatory challenges such as health human resources challenges. The purpose of the additional data collection is to measure, monitor and address inequities in the health workforce and health system, as well as encourage diversity and cultural safety in health care.</p>
<p>Risk that Database contains incomplete and/or inaccurate applicant and registrant information</p>	<p>In 2024, the College was in the process of implementing a new enterprise system. The new system is improving overall applicant user experience. This has been a three-year project that will was fully implemented by registration services at the College in 2024 for new applicants and registration renewal. This new system enables the College to more precisely track application data related to timelines and benchmarks; and efficient registration processes for applicants and registrants.</p>
<p>Risk that availability of health care personnel has reached a crisis level for governments across the country.</p>	<p>We are working with our Substantial Equivalency Assessment (SEAS) Program to support their timely assessment of international applicants. The SEAS Program attends our registration committee and provide reports to the board quarterly on performance and timelines. We are using our new data system for registration and data base to maximize efficiency and reporting. We are maintaining open communication with ACOTRO, our OT associations and</p>

	governments to maximize labour mobility.
--	--

6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of OCCUPATIONAL THERAPISTS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Registration requirements either through regulation, by-law or policy	Yes	In 2024 COTO approved a new policy for emergency class of certification. In accordance with section 38.1(1) of Ontario Regulation 226/96, under the Occupational Therapy Act, 1991, the Minister of Health can request that the College issue emergency certificates of registration under this class. Alternatively, the College Board may determine, circumstances exist that impact the ability to issue ordinary registration certificates and that it is in the public interest to issue emergency certificates of registration. The benefit to applicants is that there is an opportunity to be registered when the regular program has been disrupted (e.g. Provincial Emergency or technical failure of exam sitting). The policy was developed , to operationalize the regulation criteria and circumstances that the Board will consider when deciding to activate or resolve access to the College's Emergency Certificate of Registration in the event of an emergency. The policy describes the criteria so that fair and

		<p>consistent decisions are made regarding each application. The regulation allows certification of all qualified applicants for the period of a significant interruption of the usual registration pathway avoiding registration delays caused by an emergency. Registrants holding an Emergency Class Certificate , can transition to the General Class having already met requirements during the emergency period and the policy provides information about how to operationalize the emergency class in the event of an emergency being declared. Assessment of qualifications, including competency-based assessments and examinations</p> <p>National Sociodemographic Data collection – Working with other provincial regulators, COTO has developed a policy to Collect Sociodemographic Data upon application and Registration renewal with reference to the Canadian Institute for Health Information (CIHI) Health Human Resources Minimum Data Set Standard which will be approved in 2025. In collaboration with ACOTRO, regulators have created a common pathway for the collection of sociodemographic and practice data. As a group, the regulators analyze national level data to help solve common regulatory challenges such as health human resources challenges. The purpose of the policy is to guide additional data collection which will enable collective measures, and monitoring to positively influence inequities in the health workforce and health system, as well as encourage diversity and cultural safety in health care.</p>
--	--	--

New or consolidated class of certificates or licenses	No	
Assessment of qualifications, including competency-based assessments and examinations	Yes	In 2024, the College worked with ACOTRO to develop a Registration Competency Interview tool and national registration pathway for use with applicants returning to the practice after extended leave from the profession. The tool will be piloted nationally, in 2024, with applicants returning to practice with goals of informing practice refresher program learning plans in each jurisdiction and providing for a common approach to re-entry to practice across the country.
Documentation requirements for registration	No	
Timelines for registration, decisions and/or responses	No	
Registration and/or assessment fees	No	
Changes to internal review or appeal process	No	
Access by applicants to their records	No	
Other	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
----------------------	-------------------------	-------------

Training and resources for staff who deal with registration issues	Yes	As part of implementation of the organizational Equity, Diversity and Inclusion plan in 2024 registration staff received training related to understanding of Indigenous insights, truth and reconciliation. The board approved a strategic plan for 2024-27 in early 2024, which was a resource to guide registration processes and decisions.
Resources or training to support applicants to move through the licensing process	No	
Anti-racism and inclusion-based policies and practices	Yes	As a result of completing the Health Professions Health Professions (HPRO) Equity Impact Assessment the College implemented strategies for registration related to both application and registration renewal data collection. COTO began a national project with the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) to do this by implementing the 2022 Health Human Resources Minimum Data Set (HHR MDS) in 2023. In 2024- technical design and development will enable COTO to collect registration data, make improvements in registration processes, and use evidence generated through racialized group identity data collection to support fair registration and application processes beginning at Annual Renewal in 2025. In 2024, COTO implemented two non-statutory EDI advisory committees made up of Occupational Therapists with lived experience in equity perspectives and indigenous insights. The committees provided input to the Sociodemographic Data Collection Policy work.

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	Yes	<p>Administration Agreements: COTO maintained administration agreements with our third parties which are regularly updated.</p> <p>Partnership Meetings: COTO met with partners of the administration agreements including the Canadian Association of Occupational Therapists (CAOT) (Certification Exam) and the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) (Substantial Equivalency Assessment System (SEAS) Program for Internationally Educated Occupational Therapists. COTO received regular quarterly reports, Exam results, operational and technical reports, as well as feedback from applicants and registrants. The advantage for applicants is that these agreements enable efficient and focused provision of both services.</p>
Accreditation of educational programs	Yes	<p>The Master of Science in Occupational Therapy (MSc.OT) Program from the University of Toronto was granted an accreditation, for 7 years from April 2024 to 2031. The College monitors the accreditation status of each university in Canada and continues to participate in the accreditation process for Ontario university occupational therapy programs.</p>
Mutual recognition agreements	Yes	<p>In 2024, COTO signed a Labour Mobility Support Extension Agreement with the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) The positive impact for applicants moving their</p>

		practice nationally, is that they do not have to have regulatory history evidence approved that has already been approved in another Canadian Jurisdiction. All of the regulators use a common pathway and forms enabling registrants in good standing to move expediently to any jurisdiction in Canada.
--	--	---

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	The COTO policy describes the criteria and circumstances will consider when deciding to activate or resolve access to the College's Emergency Certificate of Registration. In accordance with section 38.1(1) of Ontario Regulation 226/96, under the Occupational Therapy Act, 1991, the Minister of Health can request that the College issue emergency certificates of registration under this class. If the Emergency Class is activated, the College will take appropriate measures to inform the public about the emergency circumstances.
Technological or digital improvements	Yes	COTO has implemented an Enterprise System to automate the application and registration processes. Both the Application Portal for New Applicants and the Annual Renewal APP have been implemented in 2024 enabling applicants to securely upload application documentation, and receive automated responses including information about next steps in real time and from a distance. As a result, applications for applicants can be completed from anywhere, received in real time, and automations enable applicants to move to registration quickly.

Steps to address labour shortages in the profession or trade	Yes	Administration Agreements: COTO maintained administration agreements with our third parties which are regularly updated. Partnership Meetings: COTO met with partners of the administration agreements including the Canadian Association of Occupational Therapists (CAOT) (Certification Exam) and the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) (Substantial Equivalency Assessment System (SEAS) Program for Internationally Educated Occupational Therapists. COTO received regular quarterly reports, Exam results, operational and technical reports, as well as feedback from applicants and registrants. The advantage for applicants is that these agreements enable efficient and focused provision of both services.
--	-----	--

7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator's membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based data collected? (Yes or No)
Members	No
Applicants	No

Additional description:

--

B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? (Yes or No)
Members	Yes
Applicants	Yes

Additional description:

Indigenous Identity- In 2015, the Truth and Reconciliation Commission (TRC) released 94 Calls to Action. Of relevance to COTO is the section on Health including Calls to Action 18-24. These address the health disparities faced by Indigenous Peoples and acknowledge how poor Health outcomes are linked to the history of colonization in Canada. With an future outcome of increasing the number of Indigenous occupational therapists in Ontario, COTO requests that OTs Self Identify during application and annual registration renewal. They are asked to self identify First Nations(status, non-status), Metis or Inuit; with choices to state no, prefer not to answer, or unsure. Age-COTO collects demographic data including age Gender-COTO collects information gender identity data (Self-Identification)
--

C. Languages of service provision

College of OCCUPATIONAL THERAPISTS of Ontario makes application materials and information available to applicants in the following languages.

Language	Yes / No
English	Yes
French	Yes
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Occupational Therapist	7126

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	6915	606
Provisional	210	7
Temporary	1	1

Gender	Number of Members
Male	628
Female	6491
X (includes trans, non-binary, and two-spirit people)	7

Jurisdiction of Initial Training	Number of Members
Ontario	5917
Other provinces and territories	598
United States	189
Other International	422

Country of Initial Training	Number of Members
Canada	6515
United States of America	189

United Kingdom	99
India	91
Australia	61
Philippines	40
Hong Kong	35
Iran	18
South Africa	15
Pakistan	12
Brazil	10
Israel	7
Germany	6
Colombia	5
Ireland	4
New Zealand	3
China	2
Spain	1
Japan	1
South Korea	1
Lebanon	1
Sri Lanka	1
Slovenia	1
Sweden	1
Thailand	1
Jordan	6

Official language of preference	Number of Members
English	7017
French	109

Racial identity (optional)	Number of Members
Indigenous	72
Not collected	7054

E. Data Notes

--

F. Applicant Profile

Profession Name	Total Number of Applicants
Occupational Therapist	522

Gender	Number of Applicants
Female	485
Male	36
X (includes trans, non-binary, and two-spirit people)	1
Other / not collected	0

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Other provinces and territories	37	6
United States	11	8
Other provinces and territories	49	19
Ontario	425	38

Country of Initial Training	Number of Applicants
Canada	462
United Kingdom	19

United States of America	11
India	7
Australia	6
Hong Kong	4
Iran	4
Brazil	1
Colombia	1
Ireland	1
Israel	1
Lebanon	1
Mauritius	1
Philippines	1
Portugal	1
Sweden	1

Official language of preference	Number of Applicants
English	516
French	6

Racial identity (optional)	Number of Applicants
Not collected	522

G. Data Notes

--

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2024. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Other provinces and territories	44	0	1
United States	6	0	0
Other provinces and territories	37	0	0
Ontario	424	0	0

I. New Registrants

For the 2024 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants	Number of internationally educated registrants
Full / General/ Independent Practice	511	43

J. Data Notes

--

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
Ontario	16	0

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals
1. Currency	12
2. 2nd provisional certificate	3
3. lang fluency	1

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants
1. 0	0

L. Data Notes

--

Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <<https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.