

College of OCCUPATIONAL THERAPISTS of Ontario

2025 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, 2025.

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
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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	No updates from the 2024 submission 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 an occupational therapist is educated outside of Canada, their education is reviewed by the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) SEAS program to ensure that it is substantially equivalent to the content

	of an Ontario occupational therapy program.
Experience requirement	No updates from the 2024 submission 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 of a College approved Refresher Program within the last 18 months.
Language requirement	Applicants must provide evidence of reasonable skills in reading, listening, speaking and writing in one of Canada’s official languages, English or French. Applicants can demonstrate that they meet the language fluency requirement in the following ways: - Applicants who obtained their occupational therapy education in Canada can provide proof of the completion of their occupational therapy degree. - Applicants who obtained their occupational therapy education outside Canada can have an accredited credential assessment agency confirm that their language of instruction for occupational therapy was English or French. This is included with the Substantial Equivalency Assessment System (SEAS) report issued by the Association of Canadian Occupational Therapy Regulatory Organizations to COTO. Through the ACOTRO SEAS process, applicants can show that they have achieved the

	<p>minimum score on one of the College approved language fluency tests listed in the Language Fluency Requirement Policy. language-fluency-requirement-8-81. Applicants who are unable to demonstrate fluency by way of above can receive approval through the ACOTRO SEAS process OR the COTO Registration Committee for alternative evidence such as language tests and scores history; experience of verbal communication validated by signed letters of support or a record of related healthcare employment validated by signed letters from practice supervisors or employers.</p>
<p>Additional information on licensing requirements (may include links to appropriate page on regulator website):</p>	<p>No updates from the 2024 submission Successful completion of the National Occupational Therapy Certification Examination administered by the Canadian Association of Occupational Therapists'. Applicants are required to submit a current Vulnerable Sector (VS) Check. Applicants 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.</p>

4. Third party assessments

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

Organization name	Function
Canadian Association of Occupational Therapists	Academic credential evaluation
Association of Canadian Occupational Therapy Regulatory Organization	Competency-based assessment
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. Applicants and Provisional Registrants are provided with information to contact COTO Registration if they have any questions or concerns with regards to NOTCE. COTO has partnered with ACOTRO (Association of Canadian Occupational Therapy Regulatory Organization, to support the process for internationally educated occupational therapist seeking registration, and guides IEOTS through the Substantial Equivalency Assessment System (SEAS). SEAS is the process ACOTRO uses to evaluate the extent to which an IEOT's education qualifications and competencies are substantially equivalent to those of a Canadian educated occupational therapist. The SEAS process determines if substantial equivalency has been met. CAOT administers accreditation of university occupational therapy programs nationally through the Academic Credentialing Council (ACC)

comprised of ACOTRO members; University Program representatives and CAOT. COTO provides oversight through quarterly reports from the Academic Credentialing Council (ACC) and direct reporting from the ACC upon accreditation of a program in Ontario to the COTO Registration Committee.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	National Pathway to Re-Entry to Practice includes Registration Competency Interview -COTO developed a common pathway incorporating a registration competency interview; Practice Supervision and Peer Assessment for returning applicants who do not meet currency (practice) requirements in partnership with ACOTRO. This approach provides a streamlined registration process for applicants who have been out of practice for a minimum of 600 hours, enabling them to begin work right away with a temporary license while refreshing their competencies to practice.
2	Collection of Voluntary Racialized Group Identity: In partnership with ACOTRO, COTO, developed our Collection of Sociodemographic Data Policy. COTO began asking occupational therapists to voluntarily share their racialized group data annually at Annual Registration Renewal 2025. With guidance from our Equity Perspectives Advisory Committee; our Indigenous Insights Advisory Committee, and our Board, this data will help us to continue to build a clear picture of the diversity within Ontario’s occupational therapy profession in 2026. The questions about racialized group identity and are structured according to the minimum data set created by the Canadian Institute of Health Information (CIHI) . ACOTRO members agreed upon the minimum requirements for sociodemographic data collection for the occupational therapy profession across the country. Anonymous, aggregate data will be shared with CIHI to assist with their development of the profile of Canadian occupational therapists. COTO is reporting racialized group data, in the FRP report for the first time this year. Four thousand two hundred

	and twenty three (4,629) registrants volunteered their racialized group identity.
3	Registration Parallel Processing for Canadian Graduates: COTO implemented a parallel processing approach within the registration application process for new graduates of Canadian universities by introducing opportunities for concurrent steps. Most new Canadian graduates apply for a provisional certificate after completing their university program and before convocation so they can begin working . Applicants complete the COTO registration application and meet all requirements, including having an occupational therapy (OT) education approved by the College. Canadian graduates, who have completed their course work may now apply for provisional registration by submitting an affidavit confirming they are currently enrolled in their program and will complete their education. Having submitted the affidavit the new graduate registrant, is registered with a provisional certificate and can begin work. Official transcripts are submitted after convocation to complete the registration record.
4	As-of-Right Pathway for Occupational Therapists Registered in Another Province In June 2025, the Ontario government passed the Protect Ontario Through Free Trade Within Canada Act, 2025, which amended the Ontario Labour Mobility Act, 2009. This amendment allows individuals who are already certified by a regulatory authority in another province to be deemed certified to practice a regulated profession in Ontario under certain conditions for a one-time period of up to six months (referred to as “As-of-Right”). To apply through the As-of-Right pathway, applicants must complete all sections of the As-of-Right Attestation Form and pay the required fee. Once submitted, applicants will receive email confirmation authorizing them to practice in Ontario. This authorization is valid for six months from the date the individual begins providing occupational therapy services in Ontario. After receiving authorization, applicants may begin working at any time and continue for up to six months while completing the full application process for a Certificate of Registration in Ontario. If registration with COTO is not obtained within this six-month period, the individual will no longer be eligible to work in Ontario. Beginning January 1, 2026 - Once the attestation is submitted, verified, and approved, authorization to practice in Ontario will typically be completed within 1 to 2 business days.
5	Accreditation of a University - The registration committee received official confirmation from the Canadian Association of Occupational Therapists

(CAOT) Academic Credentialing Council (ACC) that the Master of Science in Occupational Therapy (MScOT) program at Western University has been accredited for a seven-year period, from November 2024 to 2031. Accreditation indicates that the program meets CAOT’s national education standards, which are publicly available on their website. It is a mark of quality and ensures the program is preparing students appropriately for occupational therapy practice in Canada.

B. Risks and Mitigations

Risk	Mitigation Measure
Risk of inability to consistently collect and analyze data required to make informed decisions.	In 2024, the College was in the process of implementing a new enterprise system. In 2025, applicants began to upload their own documents for applications leading to decreased application administration time. A data cleanup project started in October 2025, which will allow us to create views and dashboards for registration team to be able to analyze trends and help applicants/registrants with real time data.
Risk of inconsistent implementation of Competencies for Occupational Therapists in Canada (2021)	CAOT will begin reviewing the NOTCE exam to incorporate the Competencies for Occupational Therapy in Canada (2021), with an expected launch of the updated NOTCE in fall 2027.
Risk that racialized group identity of individual registrants can be identified in COTO's public reporting	Data was collected on a voluntary basis at Annual Renewal 2025. To maintain the privacy of registrants when there are fewer than 5 registrants in a group, we will indicate 'No Report' in COTO reporting for governance including the Annual Report and other reporting e.g. FRP 2025. For FRP - To maintain Privacy about gender, country of origin

	(training) or racialized group when there are fewer than 5 registrants we have reported Other for countries of initial training.
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6. Changes to registration practices

During the January 1 to December 31, 2025 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
Timelines for registration, decisions and/or responses	Yes	Registration application responses and administrative timing have decreased overall in 2025 due to applicants/registrants being able to upload their own documents and templated automated responses including confirmations of decisions, are generated from the COTO Portal.
Changes to internal review or appeal process	No	
Assessment of qualifications, including competency-based assessments and examinations	Yes	National Pathway to Re-Entry to Practice: ACOTRO has developed a common pathway (with leadership of COTO) that incorporates Practice Supervision and Peer Assessment for returning applicants who do not meet currency (practice) requirements. This approach provides a streamlined process for individuals who have been out of practice and wish to

		return to the profession, while meeting all other registration requirements
Registration requirements either through regulation, by-law or policy	Yes	The COTO Board approved “As of Right” Registration Policy and amended the Practicing Without a Certificate of Registration Policy which will support the College in ensuring effective and efficient processing of out of province applicants. These policies are expected to further support the College in ensuring Canadian applicants who are registrants in good standing from other jurisdictions can practice for a period of six months before registering.
Documentation requirements for registration	Yes	For new Canadian university graduates , the university will provide an affidavit confirming they have completed their course work and are awaiting convocation.

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Anti-racism and inclusion-based policies and practices	Yes	As part of implementation of the organizational Equity, Diversity and Inclusion plan, in 2025 all College staff including registration staff, received training related to understanding of Indigenous insights, truth and reconciliation. As previously reported, the Board approved a strategic plan for 2024-27 in early 2024, which is a resource to guide registration processes and decisions and included provisions for advancing EDI throughout College policies and practices. COTO received two EDI training sessions in 2025 and has organized three additional sessions for 2026. These sessions are designed to promote equity, diversity, and

		inclusion across our organization, ensuring that all staff and stakeholders have the knowledge and tools to foster an inclusive environment.
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C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third parties	No	
Mutual recognition agreements	Yes	COTO signed an addendum to the Memorandum of Understanding on Cross Jurisdiction Remote Practice in Canada to add occupational therapists registered in British Columbia (BC) and the jurisdiction of the College of Health and Care Professionals of BC (CHCPBC). Under this agreement, occupational therapists registered in Ontario who want to provide remote services to clients located in other Canadian jurisdictions are permitted to do so under their Ontario registration. Occupational therapists who are registered with any Canadian jurisdiction including BC may now provide remote services from their province to clients located in Ontario without having to be registered with COTO.
Accreditation of educational programs	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made	Description

	(Yes / No)	
<p>Steps to address labour issues (minister /stakeholders consultations, check demand-supply gap, etc)</p>	<p>Yes</p>	<p>OTO's strategic plan (2024-27) priorities labour shortages of occupational therapists in Ontario. The College collaborates for access to the profession and consistent quality practice including supporting efforts to increase the number of licensed occupational therapists in Ontario to address the health human resources crisis & ensuring occupational therapy scope of practice is optimized in Ontario. Steps we took in 2025 to begin our work to address labour shortages in the profession included:</p> <ul style="list-style-type: none"> - Participation in health workforce collaboration with ACOTRO and CIHI related to demographic and practice data collection for the profession; - Preparation of new policies and adjustments to existing policies, processes and procedures for the implementation of As of Right, effective January 1, 2026. - Participation in the working group for development of the Federal Health Workforce Data Strategy released March 10, 2026,. To answer critical current and future health workforce planning questions, across the country the strategy provides for enhanced data to monitor trends in workforce supply, distribution, mobility, and well-being in a way that prioritizes timeliness, integration, and access to data. Read the Pan-Canadian Health Workforce Data Strategy here: https://healthworkforce.ca/wp-content/uploads/2026/03/Pan-Can-Health-Workforce-Data-Strategy_EN_Mar-2026.pdf?_gl=1*oscaol*_ga*MTA5Mzl0NzQ1Ni4xNzY1OTgyODAw*_ga_C8SRM9QRNM*czE3NzMwNzI2MzlkbzE2NyRnMSR0MTc3MzA3MjkwOCRqOCRsMCRoMA - Collaboration with ACOTRO, to develop common language and shared information about Scope of Practice across Canadian Jurisdictions. - Implementation of national pathway for individuals re-entering practice, to start work immediately with a Temporary License in Ontario.
<p>Other</p>	<p>No</p>	

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	YES
Applicants	YES

Additional description:

COTO asks registrants to voluntarily share their racialized group data during Annual Renewal. A diverse and representative health workforce is widely recognized as a strategy to help reduce inequities that affect both patients and providers. This data helps us to continue to build a clear picture of the diversity within Ontario’s occupational therapy profession. These questions are about racialized group identity and are structured according to the data set created by the Canadian Institute of Health Information (CIHI). In 2026, Anonymous, aggregate data will be shared with CIHI and in the Fair Registration Practices report to assist with development of the profile of Ontario and Canadian occupational therapists and to assure fair registration practices.

B. Other identity-based or demographic data collected

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

Applicants	Yes
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Additional description:

We collect gender information. We are in early stages of our collection of voluntary racialized group identity data and will spend 2026 consolidating reporting policies and procedures. COTO anticipates making decisions about future uses of this data in collaboration with equity perspectives and indigenous insights advisory committees and community advisors.

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	7548

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	7316	648
Provisonal	224	7
Temporary	8	1

Gender	Number of Members
Male	682
Female	6856
X (includes trans, non-binary, and two-spirit people)	10

Jurisdiction of Initial Training	Number of Members
Ontario	6297
Other provinces and territories	595
United States	191
Other International	465

Country of Initial Training	Number of Members
Canada	6893
United States of America	190
India	98
United Kingdom	109
Australia	66
Hong Kong	42
Iran	22
Pakistan	11
Brazil	11
Israel	9
Jordan	6
South Africa	12
Philippines	41
Germany	6
Ireland	6
Colombia	5
New Zealand	3
Lebanon	2
Sweden	2
Taiwan	2

Other Countries	12
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Official language of preference	Number of Members
English	7417
French	131

Racial identity (optional)	Number of Members
Black	88
East / Southeast Asian	470
Indigenous	19
Latin American	40
Middle Eastern	21
South Asian	387
White	3216
Other	681
Not collected	2626

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Occupational Therapist	573

Gender	Number of Applicants
Male	52
Female	519
X (includes trans, non-binary, and two-spirit people)	2

Jurisdiction of Initial Training	Number of Applicants
Ontario	477
Other provinces and territories	35
United States	9
Other International	51
Other/not collected	1

Country of Initial Training	Number of Applicants
Canada	512
India	11
United States of America	9
Australia	7
Iran	7
United Kingdom	7
Hong Kong	6
Nigeria	2
Philippines	2
Other Countries	10

Official language of preference	Number of Applicants
English	565
French	8

Racial identity (optional)	Number of Applicants
Black	33
White	23
South Asian	8
Not collected	507
Other	2

G. Data Notes

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H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2025. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	343		
Other provinces and territories	28		
United States	9		
Other International	48		
Other/not collected	184		

Applications with decisions pending

The table below summarizes the inventory of applications in progress as of December 31, 2025. Again, some of these applications may have been received in the previous year.

Jurisdiction of initial training	Incomplete	Complete	Total
Ontario	89	467	556
Other provinces and territories	30	29	59
United States	12	8	20
Other International	57	38	95
Other/not collected	175	0	175

I. New Registrants

For the 2025 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	311	36
Provisional	242	18
Temporary	20	7

J. Data Notes

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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	2	2
Other International	7	7

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
Other International	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
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1. Request for additional NOTCE exam attempt	5
2. Request for 2nd Provisional Certificate	4

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

L. Data Notes

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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.