



FAIRNESS COMMISSIONER

COMMISSAIRE À L'ÉQUITÉ

OFFICE OF THE FAIRNESS COMMISSIONER

595 Bay Street, Suite 1201, Toronto ON M7A 2B4

Fair Registration Practices Report 2020

The Fair Registration Practices Report was created as required in the:

- Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) s.20 and 23(1), for the regulated professions named in Schedule 1 of FARPACTA
- Health Professions Procedural Code set out in Schedule 2 of the Health Professions Act, 1991 (RHPA) s. 22.7(1) and 22.9(1), for health colleges

Guidelines for this report are available to download as a .pdf on the OFC website.

<https://www.fairnesscommissioner.com/en/Publications/Pages/Guidelines.aspx>

Organization: **College of Optometrists of Ontario**

Name of the regulated profession: **Optometry**

Contact Name: **Joe Jamieson**

Contact Email: **JJamieson@collegeoptom.on.ca**

Contact Phone Number : **(416) 479-9295**

Sections of the Report

Qualitative Information	3
a. Requirements for registration, including acceptable alternatives	3
b. Assessment of qualifications	4
c. Provision of timely decisions, responses, and reasons	4
d. Fees	4
e. Timelines.....	5
f. Policies, procedures and/or processes, including by-laws	6
g. Resource for applicants	7
h. Review or appeal processes	7
i. Access to applicants' records	8
j. Training and resources for registration staff, Council, and committee members	8
k. Mutual recognition agreements	8
l. Describing any improvements/changes implemented in the last year	Error!
Bookmark not defined.	
m. Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year	10
Quantitative Information.....	11
a. Languages	11
b. Gender applications.....	11
c. Gender of members.....	11
d. Jurisdiction where applicants obtained their initial education	12
e. Jurisdiction where applicants who became registered members obtained their initial education	12
f. Jurisdiction where members were initially trained.....	12
g. Application processed	13
h. Classes of certificate/licence	15
i. Reviews and appeals processed.....	16
j. Paid Staff	17
Submission	17

Qualitative Information

The following qualitative information is collected for the purpose of highlighting a regulator's enhancements to improve fair access year over year, including actions that result from recommendations made in the OFC's Assessment of Registration Practices.

For each of the categories below, where applicable, please describe any improvements/changes implemented in the last year by your organization or a third-party for the purpose of changing fair access.

Please also describe the impact of these improvements/changes on applicants. If you have been working on improvements/changes over the last year that have not yet been implemented, describe your progress and the expected impact the improvements/changes will have on applicants and your organization.

Provide as much detail as possible. This can include the rationale for the improvements/changes, relevant findings from preliminary work leading up to the improvements/changes, methodology, relevant dates and anything else you think is important.

Include as much supporting material as possible to support your description (e.g., relevant reports, policies, protocols, websites, other documents and anything else you think is important). This material can be provided in the form of hyperlinks to electronic sources.

a. Requirements for registration, including acceptable alternatives

- i) Describe any improvements / changes implemented in the last year
College staff accepted applications for registration electronically from candidates and followed-up with candidates later to validate submitted documents.
- ii) Describe the impact of the improvements / changes on applicants
Due to mailing delays experienced as a result of COVID-19, candidates provided their application form and registration requirements electronically to the College saving time and mailing costs.
- iii) Describe the impact of the improvements / changes on your organization
College staff saved time in not opening as many pieces of mail as in the past. They were also able to respond to candidates more quickly. Staff experienced

initial challenges in reconciling the files of candidates who initiated applications prior to COVID-19.

b. Assessment of qualifications

- i) Describe any improvements/changes implemented in the last year
The College implemented a remotely proctored Jurisprudence exam which generated candidate scores immediately subject to a proctoring report.
- ii) Describe the impact of the improvements/changes on applicants
In the comfort of their homes, candidates for registration had the flexibility to challenge a 2.5-hour exam any time during a three-day 24/7 time period without having to travel, saving time and travel costs. The candidates were notified about their exam scores more quickly.
- ii) Describe the impact of the improvements/changes on your organization
The College incurred initial development costs for developing an online Jurisprudence exam in addition to ongoing online exam and remote proctoring hosting costs. However, there were cost savings in that the College did not incur facility rental or in-person proctoring costs and staff did not incur travel costs to implement the exam or mark exams.

c. Provision of timely decisions, responses, and reasons

- i) Describe any improvements/changes implemented in the last year
The College implemented electronic candidate notifications.
- ii) Describe the impact of the improvements/changes on applicants
Candidates for registration received formal signed e-mail notifications on College letterhead in lieu of mailed letters which expedited candidate notifications.
- iii) Describe the impact of the improvements/changes on your organization
There were increased e-mails between College registration staff and applicants to provide application information and registration updates.

d. Fees

- i) Describe any improvements/changes implemented in the last year
The College waived late fees of \$105 plus HST for receiving late annual renewal fees from new registrants.

Candidates with expired vulnerable sector criminal record checks were credited for obtaining updated checks.

The National Board of Examiners in Optometry (NBEO) announced that the fee for each of Part I, II, and III, of the NBEO exam would increase by \$100 in US funds as of August 1, 2020.

i) Describe the impact of the improvements/changes on applicants

Candidates for registration were able to issue payment for the application fee later during the registration process and were not penalized a late fee of \$105.00 plus HST.

Candidates were able to update their vulnerable sector criminal record checks at no additional cost.

Candidates applying from the US paid \$100 more in US funds for each of Part I, II, and III, of the NBEO exam.

ii) Describe the impact of the improvements/changes on your organization

Working during COVID-19 resulted in increased e-mails between College registration staff and applicants to provide application status and receipts.

The College absorbed fees in the amount of \$65-\$85/candidate for updated candidate vulnerable sector criminal record checks.

The NBEO fee changes had no measurable impact on the College.

e. Timelines

i) Describe any improvements/changes implemented in the last year

Due to COVID-19, the College extended the length of time for expired applications. Under normal circumstances, applicant records related to registration applications are kept for 24 months (or two years) which is the period that registration applications are valid for. Applicants are notified by letter three months prior to the expiry of the registration application period that the application expiry was imminent and that their records will be returned to them if they do not notify the College of their intention to continue with the registration application.

The Optometry Examining Board of Canada (OEBC) postponed the spring administration of the OEBC Written and OSCE exams indefinitely as of March 18, 2020. The OEBC exam was rescheduled in September 2020.

The College accelerated the pre-registration process by having candidates mail-in their 2020 pro-rated membership fees prior to the College receiving their Sept. 2020 OEBC OSCE exam results.

The College negotiated with OEBC the direct notification of the College about fall 2020 OEBC candidate exam results instead of candidates mailing their notarized exam results to the College.

Although Parts I, II, and III of the NBEO exam were initially postponed, they were rescheduled after a few months. For example, Part III, the clinical portion, was rescheduled in May 2020. NBEO delays for Part I Applied Basic Science (ABS) March 2021 administration have been impacted by COVID-19 capacity restrictions.

The length of time for payment of application fees that includes the Jurisprudence fee, was extended due to COVID-19.

- ii) Describe the impact of the improvements/changes on applicants
Applications for registration remained open to accommodate delays experienced by applicants.

Applicants were able to become registered with the College quickly soon after receiving their successful OEBC exam results and the time period for payment of their 2021 annual renewal fees was extended for three months.

- iii) Describe the impact of the improvements/changes on your organization
There were increased e-mails to College registration staff from applicants for information regarding postponed entry-to-practice exams.

College registration staff had the challenging task of accessing miscellaneous documents provided by applicants by mail and email at various times during the registration process before reconciling applicant files.

A delay was incurred in reconciling 2021 annual fee payments due to the delayed 2021 annual fee payments by new registrants.

f. Policies, procedures and/or processes, including by-laws

- i) Describe any improvements/changes implemented in the last year
College staff worked with a learning management system provider to deliver a remotely proctored Jurisprudence exam for the first time on June 1, 2020. The exam transitioned from a one-day, two-hour, in-person exam to a three-day, 2.5-hour, 24/7, remotely proctored exam.

The College approved a Pre-Registration NBEO Sponsorship Policy on April 17, 2020 (<https://www.collegeoptom.on.ca/pre-registration-nbeo-sponsorship-policy/>).

- ii) Describe the impact of the improvements/changes on applicants
Applicants for registration can review the Jurisprudence exam material at their convenience and for as many times as needed without having to travel to attend the exam. Greater flexibility was provided for candidates to challenge the 2.5-hour exam at any time 24/7 over a period of a few days. This has made it easier for applicants to access and complete this registration requirement.

The Pre-Registration NBEO Sponsorship Policy makes it possible for internationally educated candidates to be sponsored by the College to challenge the NBEO exam. This policy mirrors the ability of internationally educated candidates to directly challenge the OEBC exam if they satisfy similar conditions.

- iii) Describe the impact of the improvements/changes on your organization
Having a remotely proctored online Jurisprudence exam resulted in increased e-mails between College registration staff and applicants for technical support during the Jurisprudence seminar and examination. There were initial development and implementation costs to the College. Now there are ongoing monthly costs to maintain the e-learning portal but reduced labour costs to prepare for the Jurisprudence seminar and exam.

g. Resource for applicants

- i) Describe any improvements/changes implemented in the last year
No changes this year
- ii) Describe the impact of the improvements/changes on applicants
Not applicable
- iii) Describe the impact of the improvements/changes on your organization
Not applicable

h. Review or appeal processes

- i) Describe any improvements/changes implemented in the last year
No changes this year
- ii) Describe the impact of the improvements/changes on applicants
Not applicable

- iii) Describe the impact of the improvements/changes on your organization
Not applicable

i. Access to applicants' records

- i) Describe any improvement/changes implemented in the last year
Due to COVID-19, the College adopted electronic filing for access to applicant records.
- ii) Describe the impact of the improvements/changes on applicants
Applicants for registration were not impacted and they were able to submit their applications electronically which expedited their application process.
- iii) Describe the impact of the improvements/changes on your organization
There was an increase in emails between College registration staff and applicants to provide application status updates. As a result of COVID-19, staff working remotely adapted to electronic filing and applicant record access was unaffected.

j. Training and resources for registration staff, Council, and committee members

- i) Describe any improvements/changes implemented in the last year
No changes this year
- ii) Describe the impact of the improvements/changes on applicants
Not applicable
- iii) Describe the impact of the improvements/changes on your organization
Not applicable

k. Mutual recognition agreements

- i) Describe any improvements/changes implemented in the last year
No changes this year
- ii) Describe the impact of the improvements/changes on applicants
Not applicable
- iii) Describe the impact of the improvements/changes on your organization
Not applicable

L Other (include as many items as applicable)**i) Describe any improvements/changes implemented in the last year**

1. The International Optometric Bridging Program (IOBP) is pursuing a self-sustaining model and developing an advanced standing program that is scheduled to commence in 2022 admitting fewer than six students per year. The last bridging program was offered in 2020 with 18 candidates.
2. The re-structuring of Part III of the NBEO exam continued in 2020. Candidates must now receive a passing score on the NBEO examination within the first six attempts.
3. The national competency profile between the College and Touchstone Institute was developed with input from optometrists representing most Canadian provinces at a cost of \$45,000.
4. The College Council approved the establishment of a \$60,000 fund to help sustain the Internationally Graduated Optometrist Evaluating Examination (IGOEE) if candidate registrations fall below the required break-even number, for as long as the IGOEE will be administered, subject to a legal agreement between the College and Touchstone Institute to administer the fund.

ii) Describe the impact of the improvements/changes on applicants

1. There is a significant decrease in the pathway for licensure available for internationally trained optometrists in Canada. However, as of 2022, there will be three pathways available for internationally trained optometrists: a) ability to challenge the OEBC exam directly if they perform significantly well on the IGOEE; b) ability to apply for the Advanced Standing Optometry program at the University of Waterloo School of Optometry and Vision Science; and c) ability to apply for advanced standing at four known accredited US optometry schools.
2. Unknown at this time
3. Once the national competency profile is developed and implemented, applicants will benefit by having the OEBC updated with an updated blueprint generated from the competency profile.
4. The IGOEE fund provides financial stability to Touchstone Institute and the incentive to continue administering the IGOEE.

iii) Describe the impact of the improvements/changes on your organization

OFFICE OF THE FAIRNESS COMMISSIONER

1. This has resulted in increased calls and e-mails to College registration staff from internationally trained candidates who are currently in the bridging pool wondering about their options.
2. Unknown at this time
3. The developed national competency profile would be a foundational framework that will support competency-based education, assessment and guide remediation.
4. The College budgeted \$60,000 in 2021 for the IGOEE fund.

I. Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year

In June 2020, the College Council approved changing the non-practising status to a certificate of registration proposed amendment to the Registration Regulation.

Provide any additional information:

Please refer to:

<https://www.collegeoptom.on.ca/wp-content/uploads/2016/06/Council-Briefing-Materials-June-25-2020.pdf>

Quantitative Information

The following quantitative information is collected for the purpose of observing statistical changes and trends related to application, licensure, appeals and staffing year over year.

a. Languages

Indicate the languages in which application materials and information about the application process are available.

Language	Yes/No
English	Yes
French	Yes

Other (please specify):

b. Gender applications

Indicate the number of applicants in each category as applicable

Gender	Number of applicants
Male	56
Female	150
None of the above	0

Additional comments:

c. Gender of members

Indicate the number of members in each category as applicable. Select the option that best corresponds to the terminology used by your organization.

Gender	Number of members
Male	1129
Female	1549
None of the above	0

Additional Comments:

For the following sections d,e & f, the OFC recognizes that the term initial education infers that applicants may receive their education in multiple jurisdictions.

For the purpose of these questions, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

d. Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education in the profession or trade

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)		Unknown	Total
81	QC -1	57	EGYPT - 1	1	0	152
			SYRIA - 1	1		
			Iran - 1	1		
			UK - 7	7		
			INDIA - 1	1		
			CHINA - 1	2		

Additional comments:

e. Jurisdiction where applicants who became registered members obtained their initial education

Indicate the number of applicants who became registered members in the reporting year by the jurisdiction where they obtained their initial education in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)		Unknown	Total
62	QC -1	57	Australia	1	0	134
			China	1		
			Egypt	1		
			UK	9		
			Iran	1		
			Syrian Arab Republic	1		

Additional comments:

f. Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)		Unknown	Total
1568	QC - 68	738	Afghanistan	1	0	2678
			Australia	5		
			Brazil	1		
			China	23		
			Colombia	9		
			Cuba	1		
			Ecuador	1		
			Egypt	26		
			Ireland	2		
			UK	133		
			Guatemala	2		
			India	26		
			Iran	29		
			Iraq	3		
			Nigeria	11		
			Nicaragua	1		
			New Zealand	1		
			Pakistan	3		
			Philippines	6		
			Russia	3		
			Saudi Arabia	1		
			Sudan	1		
			Syrian Arab Republic	3		
			Venezuela	7		
			Serbia	1		
			South Africa	4		

g. Application processed

Indicate the number of applications your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

OFFICE OF THE FAIRNESS COMMISSIONER

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	81	1	57	13	0	152
Applicant actively pursuing licensing. Those who had some contact with your organization in the reporting year	0	0	0	0	0	0
Inactive applicants. Those who had no contact with your organization in the reporting year.	5	0	0	0	0	5
Applicants who met all requirements and were authorized to become members <u>but did not</u> become members	0	0	0	0	0	0
Applicants who became <u>fully</u> registered members	62	1	57	14	0	134
Applicants who were authorized to receive an alternative licence <u>but were not</u> issued a licence	0	0	0	0	0	0
Applicants who were issued an alternative class of licence*	4	0	7	1		12

- An alternative class of licence enables the holder to practise with limitations, but additional requirements must be met in order for the member to be fully licensed.

Additional comments:

h. Classes of certificate/licence

Provide a description of the classes of certificate/license offered by your organization. You should have at least one class listed.

#	Certification	Description
1	1. General certificate of registration.	<p>In general, the requirements for a General Certificate of Registration to become a member of the College of Optometrists of Ontario include:</p> <ol style="list-style-type: none"> 1. Apply and pay the application fee. 2. Meet the established academic criteria. 3. Successfully complete the Canadian Assessment of Competence in Optometry and/or the OEBCwritten exam and OSCE and/or the NBEO exam. 4. Successfully complete the Ontario Optometric Jurisprudence exam. 5. Pay all applicable registration and assessment fees. <p>The above application process must be successfully completed for the issuance of a General Certificate of Registration.</p>
2	2. Academic certificate of registration. O. Reg. 837/93, s. 1.	<p>In order to be eligible for an Academic Certificate of Registration, the applicant must hold a full time appointment as a faculty member of the University of Waterloo or another university or optometric educational facility in Ontario approved by the College council. An applicant for an</p>

		Academic Certificate of Registration must meet specified academic criteria, but is not required to successfully complete the Canadian Assessment of Competence in Optometry and/or the OEBC written exam and OSCE and/or the NBEO exam.
--	--	---

Additional comments:

i. Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applicants that were subject to an internal review or that were referred to a statutory committee of your governing council, such as Registration Committee	0	0	0	0	0	0
Applicants who initiated an appeal of a registration decision	0	0	0	0	0	0
Appeals heard	0	0	0	0	0	0
Registration decisions changed following an appeal	0	0	0	0	0	0

OFFICE OF THE FAIRNESS COMMISSIONER

Additional comments:

j. Paid Staff

Provide the number of paid staff employed by your organization in the categories shown, as of December 31, 2020.

You may use decimals if you need to count half units. For example, on full-time employee plus one part-time employee will be equivalent to 1.5 employees.

Category	Number of staff
Total number of staff employed by the regulatory body	13.6
Number of staff involved in the appeals process	1.3
Number of staff involved in the registration process	2.0

Additional comments:

Submission

Name of individual with authority to sign on behalf of the organization:

Title: Registrar and Chief Executive Officer

Date: March 31, 2021