

College of OPTOMETRISTS of Ontario

2023 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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1. Background

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

“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 23 of FARPACTA and Section 22.9 of Schedule 2 of the RHPA 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 2023 Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2023.

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.

Please note that the 2023 version of the FRP has changed from the previous version in terms of both form and content as the OFC's enabling statutes have evolved and as the office migrates to a more permanent portal-enabled database solution.

2. Organization information

Organization name	College of OPTOMETRISTS 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 OPTOMETRISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Optometrist
Academic requirement	- Optometry Degree - ACOE accredited - International equivalent assessed by FORAC - Bridging: ASOPP/IOBP - Entry to Practice: OEBC/NBEO/CACO - Jurisprudence exam
Experience requirement	- Labour Mobility: practised to extent of license/registration in another Canadian jurisdiction

Language requirement	- English or French
Additional information on licensing requirements (may include links to appropriate page on regulator website):	- Vulnerable Sector Check/CPIC check or equivalent, and Certificate of Standing from each jurisdiction previously practised in, dated within 6 months of registration - Citizenship/PR/Work permit - Passport photo dated within 6 months of registration - Labour mobility: Letter of Attestation from a non-relative colleague - Academic Certificate: Letter of Appointment from the Academic Institution

4. Third party assessments

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

Organization name	Function
Optometry Examining Board of Canada (OEBC)	Knowledge based exam
Touchstone Institute	OSCE / Skill based exam
National Board of Examiners in Optometry (NBEO)	Knowledge based exam
Touchstone Institute	Knowledge based exam
National Board of Examiners in Optometry (NBEO)	OSCE / Skill based exam
Optometry Examining Board of Canada (OEBC)	OSCE / Skill based exam
Federation of Optometric Regulatory Authorities of Canada (FORAC)	Academic credential evaluation

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

A panel of Registration Committee members reviews the Canadian Optometric Evaluation Committee (COEC) panel’s credential assessment decisions.
 Touchstone Institute: College Registration Committee and FORAC are members of the Evaluating Exam Oversight Committee to review raw IGOEE results and any issues that came up during the exam. A member of the College Council is on the OEBC board, and the Registration Committee members observe OEBC OSCE. A Registration Committee member and current Chair has been involved in changes being made to Part III of the NBEO Examination. The College entered into a Licence and Services agreement with FORAC on September 9, 2023.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Launching the online application portal for Labour Mobility, International and Academic applications.
2	Providing an online virtual registration information session to candidates
3	Continued to provide an online Jurisprudence Exam for applicants to access remotely from anywhere in the world providing greater flexibility for candidates to challenge the exam any time 24/7 over a period of three days.

B. Risks and Mitigations

Risk	Mitigation Measure
Competing demands for staff time	Staff working more closely together.

Transitioning to the online registration process introduced additional procedures for internal staff while expediting registration process for applicants	Implementation of accurate documentation techniques and additional oversight.
Retaining trained staff while working in a hybrid environment.	Ensuring staff needs are met and staff are healthy with adequate oversight.

6. Changes to registration practices

During the January 1 to December 31, 2023 reporting period, College of OPTOMETRISTS 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	No	
New or consolidated class of certificates or licenses	Yes	Emergency Class proposed regulation was submitted and approved. Brought into Force August 31, 2023. S.1 O. Reg. 837/93
Assessment of qualifications, including competency-based assessments and examinations	No	

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	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	Yes	Training documents prepared and used to train new registration staff. Training includes attending Registration Committee meetings for new registration staff.
Resources or training to support applicants to move through the licensing process	Yes	Expanded FAQ Sections of the applicant section on the website. Optimized online applications.
Anti-racism and inclusion-based policies and practices	Yes	DEI educational sessions were provided at Council orientation and at 2 out of 4 Council meetings. A College representative attended the June 21, 2023 HPRO anti-racism in Health Regulation Project-Implementation Workshop for EDI Tools.

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	Yes	Please refer to responses in Step 1: Third Party Assessments
Accreditation of educational programs	Yes	Please refer to responses in Step 1: Third Party Assessments
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	The emergency registration plan is contained within the approved legislation.
Technological or digital improvements	Yes	The College has developed and implemented an online registration portal.
Steps to address labour shortages in the profession or trade	Yes	The College has provided to stakeholders density maps indicating optometrist availability throughout the province. The College is involved with ongoing strategies to address the issue with the Ontario Association of Ontario.
Other	No	

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:

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B. Other identity-based or demographic data collected

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

Additional description:

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C. Languages of service provision

College of OPTOMETRISTS 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
Optometrist	2891

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Full / General/ Independent Practice	2891	317

Gender	Number of Members
Male	1139
Female	1751
X (includes trans, non-binary, and two-spirit people)	1

Jurisdiction of Initial Training	Number of Members
Ontario	1636
Other provinces and territories	67
United States	871
Other International	317

Country of Initial Training	Number of Members
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United States of America	871
United Kingdom	139
Iran	30
India	29
Egypt	25
China	20
Nigeria	13
Colombia	9
Venezuela	7
Australia	7
Philippines	6
Pakistan	4
Canada	1731

Official language of preference	Number of Members
English	2868
French	23

Racial identity (optional)	Number of Members
Not collected	2891

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Optometrist	155

Gender	Number of Applicants
Male	43
Female	110
X (includes trans, non-binary, and two-spirit people)	2

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Other provinces and territories	1	0
United States	77	23
Other International	11	7
Ontario	66	14

Country of Initial Training	Number of Applicants
India	1
Iran	1
Nigeria	2
New Zealand	1
United Kingdom	6
United States of America	77
Canada	67

Official language of preference	Number of Members
English	153
French	2

Racial identity (optional)	Number of Members
Not collected	155

G. Data Notes

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H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2023. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Other provinces and territories	1		
United States	68		3
Other International	4		
Ontario	61	1	3

I. New Registrants

For the 2023 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants by class	Number of internationally educated registrants
Full / General/ Independent Practice	134	4

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 United States Other International		

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 United States Other International		

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

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

B.10 - these are candidates that underwent or are currently undergoing a practice assessment/evaluation

8. Changes Related to New Legislative and Regulatory Requirements

By Ontario law, regulated occupations must provide registration practices that are transparent, objective, impartial and fair. Non-health occupations are governed by the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)*, while health professions are governed by the *Regulated Health Professions Act, 2011 (RHPA)*.

In 2021, both statutes were amended to incorporate substantive provisions to:

- A.** Eliminate the use of Canadian experience requirements except under prescribed circumstances.
- B.** Streamline language proficiency testing requirements.
- C.** Provide for the continuity of registration processes during emergency situations.
- D.** Set registration time limits. (FARPACTA only)

College of OPTOMETRISTS of Ontario has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change required: No changes required

College of OPTOMETRISTS of Ontario has taken the following measures to comply with legislative requirements on eliminating Canadian experience requirements unless an exemption is granted or an alternative is identified that meets criteria prescribed in regulations (non-health regulators) or the exceptions in legislation are met (regulated health colleges).

B. Language Proficiency Testing

Change required: No changes required

College of OPTOMETRISTS of Ontario has taken the following measures to comply with recent legislative changes requiring that regulators accept language proficiency testing results derived from any of the tests accepted for immigration purposes to satisfy their language proficiency requirements:

College of OPTOMETRISTS of Ontario offers applicants the following options to demonstrate language proficiency.

- IELTS (General)

- CELPIP (General)
- TEF Canada
- TCF Canada
- Other (please specify) PTE

C. Emergency Registration

Change required: Yes

College of OPTOMETRISTS of Ontario has taken the following measures to comply with requirements to establish an emergency class (health colleges) or develop an emergency registration plan (non-health regulators).

Emergency Class proposed regulation was submitted and approved. Brought into Force August 31, 2023. S.1 O. Reg. 837/93

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.