

College of OPTOMETRISTS of Ontario

2024 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 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 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	Only for Labour Mobility, candidates must have practised to extent of their

	licence/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 University of Waterloo School of Optometry and Vision Science.

4. Third party assessments

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

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

Optometry Examining Board of Canada (OEBC)	OSCE / Skill based exam
Touchstone Institute	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 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 OSCEs. 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, which is still in effect.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Provided an online virtual registration information session for candidates on June 6, 2024.
2	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.

3	Met in person with Canadian students studying at US accredited optometry schools in an effort to engage with them. The schools were the Illinois College of Optometry on September 30, 2024, and the New England College of Optometry on November 18, 2024.
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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, 2024 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	No	
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	
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	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.

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	No	
Technological or digital improvements	Yes	Work commenced to transition our online membership and application database to the cloud, which will provide increased cyber-security.

Steps to address labour shortages in the profession or trade	Yes	The presentations made to Canadian students studying at accredited optometrist schools in the US facilitate the understanding of the registration process so that the students may be better informed about how to register with our College and perhaps be motivated to practise in the remote areas of Ontario to address a potential shortage of optometrists.
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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)
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Members	Yes
Applicants	No

Additional description:

The College included a voluntary survey for College registrants in its 2025 Annual Renewal period requesting that registrants identify if they offer optometric services in French or consider themselves to be Indigenous or select “Other” to add or elaborate on any other self-identification.

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	No
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Optometrist	2957

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	2957	1240

Gender	Number of Members
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Male	1147
Female	1810

Jurisdiction of Initial Training	Number of Members
Ontario	1653
Other provinces and territories	64
United States	923
Other International	317

Country of Initial Training	Number of Members
Canada	1717
United States of America	923
United Kingdom	138
Iran	31
Iraq	3
India	28
Egypt	25
China	20
Nigeria	13
Colombia	9
Venezuela	7
Australia	7
Philippines	6
Pakistan	4
Hong Kong	4
South Africa	3
Syria	3
Russia	3
Ireland	2
Guatemala	2
Serbia	1
Sudan	1
Saudi Arabia	1

New Zealand	1
Nicaragua	1
Ecuador	1
Cuba	1
Brazil	1
Afghanistan	1

Official language of preference	Number of Members
English	2934
French	23

Racial identity (optional)	Number of Members
Not collected	2957

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Optometrist	151

Gender	Number of Applicants
Male	42
Female	109

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Ontario	68	6
Other provinces and territories	1	
United States	79	25
Other International	3	3

Country of Initial Training	Number of Applicants
Canada	69
United States of America	79
United Kingdom	2
India	1

Official language of preference	Number of Applicants
English	151

Racial identity (optional)	Number of Applicants
Not collected	151

G. Data Notes

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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
Ontario	62		
Other provinces and territories	1		
United States	53		1
Other International			

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	116	0

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

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

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

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.