

# College of OPTOMETRISTS of Ontario

## 2025 Fair Registration Practices Report

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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, 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

<b>Organization name</b>	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):

<b>Profession/ Trade Name</b>	Optometrist
<b>Academic requirement</b>	As set out in the Registration Regulation, applicants must have one of the following academic qualifications: Awarded by the School of Optometry and Vision Science of the University of Waterloo, or Successful completion of a course in optometry at a university, if the course, at the time

	<p>the applicant commenced it, was accredited by the Accreditation Council on Optometric Education or another accrediting body approved by the Council, together with the award of a degree of doctor of optometry from that university, or successful completion of a degree together with any further education or training, or combination of education and training, as specified by a panel of the Registration Committee that, when taken together, evidences, in the opinion of the panel, completion of a program that is substantially equivalent to a program the completion of which would result in the awarding of the degree referred to in sub-subparagraph 2 i A of subsection 2 (1). In addition to academic qualifications, applicants must successfully complete one of the entry-to-practice examinations (OEBC, NBEO, or CACO) and pass the Ontario Jurisprudence Examination.</p>
<p><b>Experience requirement</b></p>	<p>Under the Ontario Labour Mobility Act, applicants are to have practised optometry to the extent that would be permitted by a general certificate of registration at any time in the three years immediately before the date of their Ontario application.</p>
<p><b>Language requirement</b></p>	<p>The applicant must be able to speak and write in the English or French language with reasonable fluency.</p>
<p><b>Additional information on licensing requirements (may include links to</b></p>	<p>As set out in the Registration Regulation, applicants must provide a certificate, letter, or other evidence</p>

<p><b>appropriate page on regulator website):</b></p>	<p>acceptable to the Registrar or a panel of the Registration Committee confirming that they are in good standing as an optometrist in every jurisdiction where they hold an out-of-province certificate (O. Reg. 279/12, s. 2). For the purposes of this requirement, “good standing” includes: (a) The applicant is not the subject of any disciplinary or fitness-to-practise order, proceeding, ongoing investigation, interim order, or agreement resulting from a complaint, investigation, or proceeding; and (b) The applicant has complied with all continuing competency and quality assurance requirements of the regulatory authority that issued the out-of-province certificate (O. Reg. 279/12, s. 2).</p>

### 4. Third party assessments

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

<b>Organization name</b>	<b>Function</b>
Touchstone Institute	OSCE / Skill based exam
Optometry Examining Board of Canada (OEBC)	Knowledge based exam
Federation of Optometric Regulatory Authorities of Canada (FORAC)	Academic credential evaluation
College of OPTOMETRISTS of Ontario	Jurisprudence exam

Optometry Examining Board of Canada (OEBC)	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

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	Successfully maintained and enhanced the delivery of the online Jurisprudence Exam, enabling applicants worldwide to securely access and
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	complete the assessment remotely. This improvement provided candidates with 24/7 flexibility to write the exam at any time over a three-day window, significantly increasing accessibility and convenience.
2	Collaborated with the Ministry of Health to bring the New Registration Regulation Amendments into force on September 1, 2025. Impetus was the recommendation of the HPARB Board of the landmark case that the College won in Feb. 2016 that the College “take immediate steps to ensure that the College is provided the regulatory tools to properly ensure the public interest and attainment of its legislative objectives”. “Good character” requirement -> more robust regulatory tools when assessing applicants. Keeping the Academic Certificate of Registration, but with updated requirements for registration, Introduction of the Inactive Class. While in the Inactive Class, non-practising registrants would not be required to complete continuing education or practice hours.
3	Established a robust and defensible Canadian-only entry-to-practice exam as the standard assessment for registration following the discontinuation of NBEO exam effective March 7, 2025.
4	A flowchart was created and posted on the College website to explain how the pre-registration process managed by the Federation of Optometric Regulatory Authorities (FORAC), connects with the College’s registration process.
5	Presented in-person to future Canadian candidates at Pennsylvania College of Optometry on April 4, 2025
6	Hosted a virtual Registration Information Session to over 50 applicants on May 29, 2025
7	Hosted a Stakeholder Think Tank Workshop on fair access to the Ontario Optometry profession with College stakeholders on September 18, 2025. The focus was on fair access to become a member of the Ontario optometry profession for those who have optometric education and experience outside of Canada. The priorities included removing barriers for international optometry graduates and addressing the labour market shortage of optometrists in remote areas.

**B. Risks and Mitigations**

Risk	Mitigation Measure
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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.
Identity, Exam Integrity, and Fraud Risk (Remote Exam & Remote Processes)	Strengthened multi-factor identity checks; improved ID capture and prior to exam start.
Applicant Guidance and Rural/International Time Zones that can cause time-zone constraints	Application guidance instructions with plain language and checklists to support applicant throughout the process and added step-by-step portal prompts. Provided 24/7 exam availability over three days for added time-zone-aware scheduling support.

## 6. Changes to registration practices

During the January 1 to December 31, 2025 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
Timelines for registration, decisions and/or responses	Yes	After initial application approval, administrative requirements such as sourcing insurance, providing practice location details, and payment of fees or completing a Non-Practising Status Undertaking must be

		completed and submitted to the College. The Acknowledgment and Undertaking replaced the Non-Practising Status Undertaking Form now that amendments to the Registration Regulation were brought into force as of September 1, 2025. Applicants are given 30 days to complete these items. Should an applicant require additional time, we will grant an extension. It takes up to 10 business days to process a registration once the administrative requirements are received.
Changes to internal review or appeal process	No	
Assessment of qualifications, including competency-based assessments and examinations	No	
Registration requirements either through regulation, by-law or policy	Yes	Collaborated with the Ministry of Health to bring the New Registration Regulation Amendments into force on September 1, 2025. The impetus was the recommendation of the HPARB Board of the landmark case that the College won in Feb. 2016 that the College “take immediate steps to ensure that the College is provided the regulatory tools to properly ensure the public interest and attainment of its legislative objectives”. The “good character” requirement provides a more robust regulatory tool when assessing applicants. The Academic Certificate of Registration has been maintained, but with updated requirements for registration. While in the Inactive Class, non-practising registrants would not be required to

		complete continuing education or practice hours.
Documentation requirements for registration	No	

**B. Training, policy and applicant supports**

<b>Registration process</b>	<b>Changes Made (Yes / No)</b>	<b>Description</b>
Anti-racism and inclusion-based policies and practices	Yes	Diversity, Equity, and Inclusion (DEI) educational sessions were provided at Feb. 7, 2025, Council orientation and the Dec. 12, 2025 Council meeting. The College's 2022-2025 strategic plan identifies DEI as a strategic pillar. Our DEI plan helps to guide the College's operations. For more information, please refer to: <a href="https://collegeoptom.on.ca/about-us/diversity-equity-and-inclusion/">https://collegeoptom.on.ca/about-us/diversity-equity-and-inclusion/</a> .

**C. System partners**

<b>Registration process</b>	<b>Changes Made (Yes / No)</b>	<b>Description</b>
Steps to increase accountability of third parties	Yes	The College maintains cooperative and collaborative relationships with third parties and responds in a timely and effective manner to changing public expectations. The College actively engages with system partners to align oversight of the practice of the profession and support execution of its mandate.
Mutual recognition agreements	No	

<p>Accreditation of educational programs</p>	<p>Yes</p>	<p>The Accreditation Council on Optometric Education (ACOE) assigns one of two classifications to professional optometric programs: Accredited, which is granted to programs that generally meet all accreditation standards, and Accredited with Conditions, which is applied when a program has significant deficiencies or weaknesses that place its educational effectiveness at risk and require corrective action. According to the November 26, 2025, ACOE listing for Accredited Professional Optometric Degree Programs, the Inter American University of Puerto Rico, School of Optometry was classified as Accredited with Conditions, with its next scheduled site visit set for 2030. The June 19-21, 2024, decision of the Accreditation Council on Optometric Education (ACOE) to lower the accreditation status of the Inter American University of Puerto Rico, School of Optometry, Professional Optometric Degree program to "Accredited with Conditions" became final on August 10, 2024. No request for reconsideration or appeal was filed by the program. This had no impact on our current applicants during this cycle. For more information, please see visit the ACOE website: <a href="https://theacoe.org/accreditation-process">https://theacoe.org/accreditation-process</a>.</p>
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**D. Responsiveness to changes in the regulatory environment**

<p><b>Registration process</b></p>	<p><b>Changes Made (Yes / No)</b></p>	<p><b>Description</b></p>
<p>Steps to address labour issues (minister/stakeholders consultations, check</p>	<p>Yes</p>	<p>In 2025, the College developed two Professional Advisories one of which was Access to Eye Care for Indigenous Persons in Ontario. Professional advisories are intended</p>

demand-supply gap, etc)		<p>to provide optometrists and future registrants with additional guidance. Access to Eye Care for Indigenous Persons in Ontario Advisory concerns access to eye care for Indigenous persons in Ontario and is based on a report developed in collaboration with the College of Opticians of Ontario, Summary Report – Eye Care Service Delivery for Indigenous Persons in Ontario. Informed by the original report, this document can be used by optometrists to reflect on and enhance their practices. For more information, please refer to: <a href="https://collegeoptom.on.ca/wp-content/uploads/Access-to-Eye-Care-for-Indigenous-Persons-in-Ontario.pdf">https://collegeoptom.on.ca/wp-content/uploads/Access-to-Eye-Care-for-Indigenous-Persons-in-Ontario.pdf</a> The College hosted a Stakeholder Think Tank Workshop on fair access to the Ontario Optometry profession with stakeholders on September 18, 2025. The focus was on fair access to become a member of the Ontario optometry profession for those who have optometric education and experience outside of Canada. The priorities included removing barriers for international optometry graduates and addressing the current labour market shortage of optometrists via stakeholder collaboration. College staff made in-person presentations to students studying at accredited optometry schools in the US such as the Pennsylvania College of Optometry on April 4, 2025, to 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.</p>
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

	<b>Race-based data collected? (Yes or No)</b>
Members	No
Applicants	No

Additional description:

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### B. Other identity-based or demographic data collected

	<b>Other identity-based or demographic data collected? (Yes or No)</b>
Members	Yes
Applicants	Yes

Additional description:

Gender identity and languages spoken are collected during the initial application process and again during annual renewal, and this information is used to support transparency and accessibility. Language(s) of service and gender are displayed on the College’s Public Register so members of the public can search for a registrant who meets their communication needs or personal preferences.
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Collecting this data also helps the College maintain accurate records and understand the diversity of its registrants.

### 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)	Some application materials and information are available in French.

### D. Membership Profile

Profession Name	Total Number of Members
Optometrist	2999

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	2851	1188
Academic certificate of registration	2	2
Inactive certificate of registration	146	83
Emergency certificate of registration	0	0

Gender	Number of Members
Male	1148
Female	1849

X (includes trans, non-binary, and two-spirit people)	2
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Jurisdiction of Initial Training	Number of Members
Ontario	1663
Other provinces and territories	63
United States	959
Other International	314

Country of Initial Training	Number of Members
Canada	1726
United States of America	959
United Kingdom	138
Iran	30
Afghanistan	1
Australia	5
Brazil	1
China	24
Colombia	9
Cuba	1
Ecuador	1
Egypt	25
Guatemala	2
India	27
Ireland	2
Iraq	3
Nigeria	14
Nicaragua	1
New Zealand	1
Pakistan	4
Philippines	6
Russia	3
Saudi Arabia	1
Sudan	1

Syria	3
Venezuela	7
Serbia	1
South Africa	3

Official language of preference	Number of Members
English	2977
French	22

Racial identity (optional)	Number of Members
Not collected	2999

## E. Data Notes

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## F. Applicant Profile

Profession Name	Total Number of Applicants
Optometrist	<b>126</b>

Gender	Number of Applicants
Male	31
Female	95

<b>Jurisdiction of Initial Training</b>	<b>Number of Applicants</b>
United States	62
Other provinces and territories	0
Other International	8
Ontario	56

<b>Country of Initial Training</b>	<b>Number of Applicants</b>
Canada	56
United States of America	62
United Kingdom	5
China	2
Nigeria	1

<b>Official language of preference</b>	<b>Number of Applicants</b>
English	126

<b>Racial identity (optional)</b>	<b>Number of Applicants</b>
Not collected	126

### **G. Data Notes**

The College collected Indigenous racial identity on a voluntary basis during the 2024 annual renewal period.

### **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.

<b>Jurisdiction of initial training</b>	<b>Successful</b>	<b>Unsuccessful</b>	<b>Withdrawn</b>
United States	61	0	1
Other provinces and territories	0	0	0
Other International	8	0	0
Ontario	56		

### **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.

<b>Jurisdiction of initial training</b>	<b>Incomplete</b>	<b>Complete</b>	<b>Total</b>
United States	26	46	72
Other provinces and territories	0	0	0
Other International	2	6	8
Ontario	10	36	46

## **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	102	49
Academic certificate of registration	0	0
Inactive certificate of registration	15	11
Emergency certificate of registration	0	0

## J. Data Notes

The majority of applications with incomplete status as of December 31, 2025, were for applicants who did not submit all the required application documents. After initial application approval, administrative requirements such as sourcing insurance, providing practice location details, and payment of fees or completing a Non-Practising Status Undertaking must be completed and submitted to the College. The Acknowledgment and Undertaking replaced the Non-Practising Status Undertaking Form now that amendments to the Registration Regulation were brought into force as of September 1, 2025. Applicants are given 30 days to complete these items. An applicant can request for an extension if they require additional time to complete the requirements. Accordingly, registrations were issued on or after January 1, 2026, should the applicants successfully provide the application documents.

## 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
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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**

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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.