

# Fair Registration Practices Report

## Optometrists (2015)

The answers seen below were submitted to the OFC by the regulated professions.

This Fair Registration Practices Report was produced as required by:

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

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## 1. Qualitative Information

<b>a) Requirements for registration, including acceptable alternatives</b>
<b>i. Describe any improvements / changes implemented in the last year.</b>
The application form for registration was updated in November 2015 to include questions associated with additional transparency requirements which prompted changes in the College by-laws approved by the College Council on September 30, 2015.
<b>ii. Describe the impact of the improvements / changes on applicants.</b>
The above changes require applicants to answer additional questions related to transparency requirements on the application form for registration.
<b>iii. Describe the impact of the improvements / changes on your organization.</b>
The College is able to find out more information about applicants than in the past and is able to better protect the public.
<b>b) Assessment of qualifications</b>
<b>i. Describe any improvements / changes implemented in the last year.</b>
The evaluating exam was administered by Touchstone Institute for the first time on June 27, 2015, replacing the prior learning assessment (PLA) exam which was last administered in February 2015.
<b>ii. Describe the impact of the improvements / changes on applicants.</b>
The evaluating exam is administered once a year with a possible second administration depending on the number of referred candidates and Touchstone Institute's capacity, at a somewhat increased cost from the cost of the PLA exam. Applicants can be more confident that the pre-registration process is more objective, impartial, and fair than in the past.
<b>iii. Describe the impact of the improvements / changes on your organization.</b>
The evaluating exam is being administered by an independent third-party organization which eliminates any real or apparent conflicts of interest which may have existed in the past. Additionally, the exam is a high-stakes exam and uses performance objective structured clinical examination (OSCE). This has helped to make the pre-registration process more objective, impartial, and fair, and at the same time, more robust.
<b>c) Provision of timely decisions, responses, and reasons</b>
<b>i. Describe any improvements / changes implemented in the last year.</b>
No changes this year
<b>ii. Describe the impact of the improvements / changes on applicants.</b>
No changes this year
<b>iii. Describe the impact of the improvements / changes on your organization.</b>
No changes this year
<b>d) Fees</b>

**i. Describe any improvements / changes implemented in the last year.**

The cost of challenging the evaluating exam is \$5,000 charged by Touchstone Institute, which is somewhat higher than what it cost to challenge the PLA exam.

The credential assessment fees increased from \$475 charged by the College to \$850 charged by the Federation of Optometric Regulatory Authorities (FORAC).

**ii. Describe the impact of the improvements / changes on applicants.**

It is more challenging for applicants to pay for credential assessment and to challenge the evaluating exam.

**iii. Describe the impact of the improvements / changes on your organization.**

The higher fees for credential assessment and to challenge the evaluating exam, is the cost of having a more robust and a more objective, impartial, and fair pre-registration process. Although the College is no longer involved in setting fees for the pre-registration process, it monitors the fees set by Touchstone Institute and FORAC on a regular basis to ensure that they are reasonable.

**e) Timelines**

**i. Describe any improvements / changes implemented in the last year.**

The transition from credential assessment by the College to the FORAC credential assessment process, continued in 2015. The FORAC credential assessment committee (COEC) panels began convening a lot more frequently in order to process more credential assessments in time for the June 2015 evaluating exam.

**ii. Describe the impact of the improvements / changes on applicants.**

More candidates were able to challenge the June 2015 evaluating exam as a result of the increase in completed successful FORAC credential assessments.

**iii. Describe the impact of the improvements / changes on your organization.**

The College was instrumental in the decision by FORAC to convene additional COEC meetings in order to increase the number of completed credential assessments on a weekly basis.

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

**i. Describe any improvements / changes implemented in the last year.**

The College Council considered making more information about optometrists available to the public to help them make informed decisions about their health care. This was in response to requests from the Minister of Health and Long-Term Care for increased transparency and accountability in professional regulation. As a result, amendments were made to Part 18-Register of the College's General By-Laws that set out what information about optometrists is included on the public register. The amendments were approved at the September 30, 2015, Council meeting and the amendments took effect for all complaints/Registrar's reports received by the College on or after October 1, 2015. Although the changes were not retroactive, they led to information about current provincial, federal, and other offences laid out before October 1, 2015, and relevant to optometrists' suitability to practise, to be posted. This subsequently led to changes in the questions asked of applicants on the application form for registration in order to mirror those asked of members.

Another change that took place was the process of having internationally educated applicants 'referred' by the College's Registration Committee to apply to the evaluating exam. The referral is based on the successful assessment of their credentials and the number of times they attempted the prior learning assessment (PLA) exam. The referral process involves having an Evaluating Exam Referral Form completed by the applicants, and approved by the College, before the applicants can register for the evaluating exam. Each completed Referral Form is assigned a number in chronological order that it is received by the College, and the referrals are tracked by the College's registration staff using a spreadsheet to ensure that applicants are fairly referred to challenge the evaluating exam. The College is coordinating this process on behalf of the other Canadian provinces.

**ii. Describe the impact of the improvements / changes on applicants.**

For the amendments to the College By-Laws, this has led to additional questions asked of applicants on the application form for registration.

For the referral process to apply to the evaluating exam change, the impact on applicants is the establishment of a fair process free from any real or perceived conflicts of interest for applicants to challenge the evaluating exam once their credentials have been successfully assessed. Applicants have become familiarized with a slightly different process after the FORAC credential assessment process was established.

**iii. Describe the impact of the improvements / changes on your organization.**

In having additional questions asked of applicants on the application form for registration, the College is able to find out more information about applicants than in the past and is able to better protect the public.

For the referral process to apply to the evaluating exam change, the College is reassured that the process is a fair system free from any real or perceived conflicts of interest. It has also resulted in additional work for the College's registration staff, for example, to communicate with applicants and to coordinate the information and pass it onto Touchstone Institute.

**g) Resources for applicants**

**i. Describe any improvements / changes implemented in the last year.**

A comprehensive description of the evaluating exam is made available to applicants via a link to Touchstone Institute's website. This description includes a Participant Guide which contains information on the written component (MCQ) and the short and long performance (OSCE) components. The information includes the number of questions in each component, what they assess, and each component's format; sample MCQ questions and short and long OSCE scenarios including candidate instructions and timing involved; and an equipment list complete with photos involved in the long OSCE scenarios. In addition, exam candidates are provided with an orientation and a tour of the OSCE stations prior to challenging the exam.

**ii. Describe the impact of the improvements / changes on applicants.**

Applicants are familiarized with the evaluating exam format, instructions, and terms, in addition to the type of questions and short and long OSCE scenarios used in the exam. This makes the exam process transparent and fair.

**iii. Describe the impact of the improvements / changes on your organization.**

The information provided to applicants eliminates the element of surprise so that exam candidates can focus on using their knowledge, skills, and experience to challenge the evaluating exam to the best of their ability. This provides the College the assurance that the candidates' knowledge, skills, and experience are being evaluated, and that the exam process is transparent and fair.

**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.**

No changes this year

**iii. Describe the impact of the improvements / changes on your organization.**

No changes this year

**i) Access to applicant records**

**i. Describe any improvements / changes implemented in the last year.**

No changes this year

**ii. Describe the impact of the improvements / changes on applicants.**

No changes this year

**iii. Describe the impact of the improvements / changes on your organization.**

No changes this year

**j) Training and resources for registration staff, Council, and committee members**

**i. Describe any improvements / changes implemented in the last year.**

Registration Committee members attended the new Building an Inclusive Regulatory Environment workshop on April 13, 2015.

Registration staff, Council, and Registration Committee members were in attendance when staff from the Office of the Fairness Committee (OFC) were invited to make a presentation at the June 18, 2015, Council meeting.

Registration staff attended the OFC's first Learning Day held on November 25, 2015.

**ii. Describe the impact of the improvements / changes on applicants.**

Applicants benefit when registration staff, Council, and Registration Committee members are more informed and better trained about the College's obligations. This results in applicants having more confidence that the pre-registration and registration processes are transparent, objective, impartial, and fair.

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

The College is better informed about how to ensure that the pre-registration and registration processes are transparent, objective, impartial, and fair.

**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.

No changes this year

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

No changes this year

**l) Other (include as many items as applicable)**

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

No changes this year

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

No changes this year

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

No changes this year

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

In the absence of a good character clause in the Registration Regulation (O.Reg. 837/93) as amended under the *Optometry Act, 1991*, a new registration policy, Assessing an Applicant's Good Character, was drafted and approved by Council on September 30, 2015. The Policy applies to all applicants who apply for a certificate of registration from the College. It explains, in the interests of transparency and fairness, how the College assesses information from or about applicants for whom evidence of past conduct raises questions about their ability to practise optometry with honesty and integrity, also known as "good character".

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## 2. Quantitative Information

**a) Languages**

Indicate the languages in which application information materials were available in the reporting year.

Language	Yes/No
English	Yes
French	No

Other (please specify)

Additional comments:

Application information materials can be made available in French if requested. There is limited application information in French available on the College website.

**b) Gender of applicants**

Indicate the number of applicants in each category as applicable.

Gender	Number of Applicants
Male	40
Female	74
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	32
Female	63
None of the above	0

Additional comments:

**d) Jurisdiction where applicants obtained their initial education**

Indicate the number of applicants by the jurisdiction where they obtained their initial education<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
45	2	37	U.K. 15	0	114
			Egypt 3		
			India 2		
			Hong Kong 2		
			Philippines 2		
			Venezuela 1		
			S. Africa 1		
			Iran 1		
			China 1		
			Colombia 1		
			Iraq 1		
			Total 30		

<sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

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<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
46	3	29	U.K. 10	0	95
			Philippines 3		
			India 1		
			Iran 1		
			Egypt 1		
			Venezuela 1		

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Total 17		

<sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

#### f) Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Afghanistan 1		
			Australia 3		
			Brazil 1		
			China 17		
			Colombia 9		
			Ecuador 1		
			Egypt 22		
			U.K. 74		
			Guatemala 1		
			Hong Kong 1		
			India 21		
			Ireland 2		
			Iran 24		
1440	58	529	Iraq 2	0	2243
			Nigeria 9		
			Nicaragua 1		
			New Zealand 1		
			Pakistan 3		
			Philippines 5		
			Russia 3		
			S Arabia 1		
			Syrian Arab Republic 2		
			Venezuela 7		
			S. Africa 3		
			OTHER 2		
			Total 216		

<sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

#### g) Applications processed

Indicate the number of applications your organization processed in the reporting year:

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	45	2	37	30	0	114
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	66	3	47	51	0	167
Inactive applicants (applicants who had no contact with your organization in the reporting year)	9	0	3	5	0	17
Applicants who met all requirements and were authorized to become members but did not become members	1	0	1	1	0	3

from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applicants who became FULLY registered members	46	3	29	17	0	95
Applicants who were authorized to receive an alternative class of licence <sup>3</sup> but were not issued a licence	0	0	0	0	0	0
Applicants who were issued an alternative class of licence <sup>3</sup>	0	0	0	0	0	0

<sup>1</sup> An alternative class of licence enables its holder to practice with limitations, but additional requirements must be met in order for the member to be fully licensed.

Additional comments:

#### h) Classes of certificate/license

Indicate and provide a description of the classes of certificate/license offered by your organization.

You must specify and describe at least one class of certificate/license (on line a) in order for this step to be complete.

#	Certification	Description
		<b>Description (a)</b>
a)	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"> <li>1. Apply and pay the application fee.</li> <li>2. Meet the established academic criteria.</li> <li>3. Successfully complete the Canadian Assessment of Competence in Optometry (CACO).</li> <li>4. Successfully complete the Ontario Optometric Jurisprudence exam.</li> <li>5. Pay all applicable registration and assessment fees.</li> </ol> <p>The above application process must be successfully completed for the issuance of a General Certificate of Registration.</p>
		<b>Description (b)</b>
b)	Academic Certificate of Registration	<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 Academic Certificate of Registration is not required to successfully complete the Canadian Assessment of Competence in Optometry (CACO) exam.</p>

Additional comments:

#### i) Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee	0	1	1	0	0	2
Applicants who initiated an appeal of a registration decision	1	0	0	0	0	1
Appeals heard	1	0	0	0	0	1
Registration decisions changed following an appeal	0	0	0	0	0	0



from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
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Additional comments:

**j) Paid staff**

In the table below, enter the number of paid staff employed by your organization in the categories shown, on December 31 of the reporting year.

When providing information for each of the categories in this section, you may want to use decimals if you count your staff using half units. For example, one full-time employee and one part-time employee might be equivalent to 1.5 employees.

You can enter decimals to the tenths position only. For example, you can enter 1.5 or 7.5 but not 1.55 or 7.52.

Category	Staff
Total staff employed by the regulatory body	10.0
Staff involved in appeals process	2.0
Staff involved in registration process	2.5

Additional comments:

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### 3. Submission

I hereby certify that:

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

Dr. Paula L. Garshowitz

**Title:**

Registrar

**Date:**

2016/03/01

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