

College of OPTICIANS of Ontario

2024 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

Content

1. Background
2. Organization information
3. Registration requirements
4. Third party assessments
5. Accomplishments, risks and mitigations
6. Changes to registration practices
7. Membership and application data

Glossary of terms

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 OPTICIANS of Ontario
--------------------------	---------------------------------

For questions about this report, please contact:

Name	Amy Stein
Job Title	Deputy Registrar & General Counsel
E-mail	astein@collegeofopticians.ca

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 OPTICIANS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Optician
Academic requirement	The academic requirements for registration are set out in the College's Registration Regulation. To meet the academic requirements for registration as a registered optician, applicants must have successfully completed and graduated from a Canadian opticianry program that is approved by the Registration Committee or an accrediting body recognized by the Committee; or have graduated from a Canadian opticianry program that the Registration Committee has

	<p>determined to be equivalent to an approved program. Applicants who have completed an opticianry program outside Ontario, which is similar but not equivalent to the programs noted above, must successfully complete a prior learning assessment approved by the Registration Committee demonstrating that the applicant possesses the entry-to-practice competencies equivalent to those of a graduate from an opticianry program noted above. To meet the academic requirement for registration as an intern optician, applicants must have successfully completed and graduated from a Canadian opticianry program that is approved by the Registration Committee or an accrediting body recognized by the Committee; or have graduated from a Canadian opticianry program that the Registration Committee has determined to be equivalent to an approved program; or have applied for a certificate of registration as a registered optician and has been ordered by the Registration Committee to complete additional training and/or specified examinations and have completed the training but not the examinations. The latter applies to applicants undergoing an assessment of their prior learning and skills.</p>
<p>Experience requirement</p>	<p>To qualify for registration as a Registered Optician, applicants must demonstrate successful completion of a practicum approved by the</p>

	<p>Registration Committee or practical experience deemed by the Registration Committee to be equivalent to the practicum noted above. The College's Practicum Policy sets out practical experience requirements for entry to practice as follows: 1000 verified dispensing hours, 250 eyeglass fittings, and 20 contact lens fittings. Completion of these requirements must be supervised by an authorized dispenser in the jurisdiction where the dispensing/fittings occur and may be completed in any jurisdiction.</p>
<p>Language requirement</p>	<p>As set out in the Registration Regulation, it is a requirement for any class of certificate of registration that the applicant must be able to speak and write either English or French with reasonable fluency. The criteria for language proficiency are further set out in the Language Proficiency Policy. The policy includes all language tests approved by the Immigration, Refugees and Citizenship Canada (IRCC).</p>
<p>Additional information on licensing requirements (may include links to appropriate page on regulator website):</p>	<p>Demonstration of \"good character\": the applicant's past conduct must not raise any reasonable doubts about their knowledge, skills, or judgment to practice opticianry safely and professionally.</p>

4. Third party assessments

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

Organization name	Function
National Alliance of Canadian Optician Regulators (NACOR)	OSCE / Skill based exam
National Alliance of Canadian Optician Regulators (NACOR)	Prior learning and recognition
World Education Services (WES)	Academic credential evaluation
National Alliance of Canadian Optician Regulators (NACOR)	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 OPTICIANS of Ontario takes the following measure(s) to ensure fair and timely assessments:

The College regularly evaluates and monitors WES assessment practices with respect to applicants who used the WES evaluation services. All reports received from WES are reviewed by the College staff for consistency and to identify any gaps or anomalies. In 2024, the College transferred the administrative functions related to the administration of the national examinations to NACOR. The College developed a Memorandum of Understanding (MOU) with NACOR to address requirements such as the training and qualification of examiners, accessibility issues, such as examination venue location, and factors that address diversity, equity, and inclusion. The MOU with NACOR also stipulates that at least two examination sessions must be held in Ontario each year. The College continues to maintain a central role in examination oversight through its participation in NACOR's National Examination Committee and by having an Examination Observer attend all examination sessions to observe and provide feedback.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Launch of online application portal. The new portal simplifies the application process for users, improves accessibility, and enhances overall efficiency of the process leading to shorter application processing timelines. The College utilizes feedback from applicants to monitor the effectiveness of the registration process and to identify areas of improvement.
2	Prior Learning Assessment and Recognition (PLAR) promotion campaign. In 2024, the College initiated a project with NACOR and the other Canadian opticianry regulators to develop a public awareness campaign to promote the PLAR process as an alternative pathway to registration. The campaign will be primarily aimed at internationally trained opticians, optometrists, and/or others with relevant education and training who are seeking to practice opticianry in Canada without the need to complete additional education. Interest in this pathway has become increasingly relevant in light of recent restrictions on access to international student visas. This collaboration seeks to ensure that there continues to be an adequate number of qualified opticians available to serve the needs of Ontario patients, and to ensure those seeking to register in the province can do so without unnecessary delays or barriers. In order to build a more effective and focused campaign, the College invested in market research in 2024 to gather information to better understand international applicant demand, countries of origin for those seeking to register in Canada as opticians, and best information delivery modes to reach target groups (e.g. social media channels). Work is currently underway to deploy the awareness campaign following an upcoming Industry Roundtable event scheduled for Spring 2025, where the College is planning to further widen its reach by collaborating with additional system partners made up of industry, education and professional associations.

B. Risks and Mitigations

Risk	Mitigation Measure
------	--------------------

<p>Constraints related to practicum requirements under O. Reg 869/93 (Registration Regulation under the Opticianry Act, 1991).</p>	<p>Amendments to the College’s Registration Regulation came into effect on July 1, 2024. Prior to these amendments, the regulation included practical experience requirements for entry-to-practice that were difficult for applicants to meet due to diminishing use of certain optical appliances in the modern practice environment. Under the amended regulation, practicum requirements are now set out in policy. The College is in the process of carrying out research and consultations to identify updated practicum requirements that will better align with current practice environments. Updates to the practicum are expected to be identified in 2025, and implemented once education programs have a reasonable opportunity to make the necessary program adjustments.</p>
--	---

6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of OPTICIANS 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
----------------------	-------------------------	-------------

<p>Registration requirements either through regulation, by-law or policy</p>	<p>Yes</p>	<p>Amendments to the Registration Regulation came into force on July 1, 2024. The key changes related to registration requirements are summarized as follows. PLAR Eligibility: Eligibility for applicants to access the Prior Learning Assessment and Recognition (PLAR) process has been expanded under the new regulation to include graduates of any unaccredited opticianry program outside of Ontario. Practicum: Practical requirements for registration as a Registered Optician have been removed from the Registration Regulation and are now defined via Practicum Policy: https://collegeofopticians.ca/sites/default/uploads/files/(2024)%20Approved%20-%20Practicum%20Policy.pdf Examination Attempts: Intern Opticians continue to have three attempts (or three years) to pass the National Examinations, after which they must complete upgrading measures before attempting the exams again. As of July 1, 2024, Intern Opticians who fail the exams a fourth time are now required to complete a fresh opticianry program before being eligible to attempt the exams again. Currency of Practice: Applicant must have successfully completed the approved opticianry program outlined or the NACOR examinations within 18 months prior to the application date; or have practiced opticianry within the three years before the application date in a manner that demonstrates that the applicant will meet the standards of practice of the profession. Applicant who do not meet the currency requirements are required to complete a refresher program or professional competency assessment set or approved by the Registration Committee. Student Registration: Effective July 1, 2024, the Registered Student class of registration has been eliminated. This registration class, was previously optional and rarely used, was determined to no longer be necessary. All certificates of registration in the Student class were automatically cancelled as of July 1, 2024.</p>
<p>New or consolidate</p>	<p>Yes</p>	<p>Effective July 1, 2024, the College introduced a new Inactive Class of registration intended for non-practising opticians.</p>

<p>d class of certificates or licenses</p>		<p>Detailed information about the Inactive Class can be found on the College's website: https://collegeofopticians.ca/registrants/registered-opticians/inactive-class</p>
<p>Assessment of qualifications, including competency-based assessments and examinations</p>	<p>No</p>	
<p>Documentation requirements for registration</p>	<p>No</p>	
<p>Timelines for registration, decisions and/or responses</p>	<p>No</p>	
<p>Registration and/or assessment fees</p>	<p>No</p>	
<p>Changes to internal review or appeal process</p>	<p>No</p>	

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	No	
Resources or training to support applicants to move through the licensing process	Yes	Beginning in Spring 2024, the College began a wide-scale education campaign to help support applicants, registrants and other impacted system partners to understand and implement the changes related to the new Regulation. In addition to e-blasts, social media posts, website updates, blog posts and webinars, the College leveraged existing relationships with opticianry professional associations to arrange speaking spots and/or booths at six in-person registrant events across the province (Toronto, Ottawa, London and Sudbury). Through participation in Program Advisory Committee (PAC) meetings organized by four accredited Canadian opticianry programs, the College had an opportunity to provide program coordinators, students and intern opticians with important updates about the regulation changes and answer questions.
Anti-racism and inclusion-based	No	

policies and practices		
------------------------	--	--

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	Yes	The College developed a Memorandum of Understanding (MOU) with NACOR in connection with the transfer of the administration of national examinations. The MOU addresses requirements such as the training and qualification of examiners, accessibility issues, such as examination venue location, and factors that address diversity, equity, and inclusion.
Accreditation of educational programs	No	
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	The College launched an online application portal. The new portal simplifies the application process for users, improves accessibility, and enhances the overall efficiency of the process leading to shorter application processing timelines.

Steps to address labour shortages in the profession or trade	Yes	In 2024, the COO initiated a project with NACOR and the other Canadian opticianry regulators to develop a public awareness campaign to promote the Prior Learning Assessment and Recognition (PLAR) process as an alternative pathway to registration. The campaign will be primarily aimed at internationally trained opticians, optometrists, and/or others with relevant education and training who are seeking to practice opticianry in Canada without the need to complete additional education. Interest in this pathway has become increasingly relevant in light of recent restrictions on access to international student visas. This collaboration seeks to ensure that there continues to be an adequate number of qualified opticians available to serve the needs of Ontario patients, and to ensure those seeking to register in the province can do so without unnecessary delays or barriers.
--	-----	--

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:

--

B. Other identity-based or demographic data collected

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

Additional description:

Gender identity; languages spoken

C. Languages of service provision

College of OPTICIANS 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
Optician	3594

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	3396	94
Inactive Opticians (Non-Practising)	5	0
Intern Opticians	193	14

Gender	Number of Members
Female	2227
X (includes trans, non-binary, and two-spirit people)	3
Male	1364

Jurisdiction of Initial Training	Number of Members
Ontario	3051
Other provinces and territories	435
United States	10
Other International	98

Country of Initial Training	Number of Members
Canada	3486
India	31
Iran	12
United States of America	10
Philippines	9
Australia	1
Morocco	1
United Kingdom	4
Nigeria	6
China	4

France	3
Hong Kong	4
Poland	2
Algeria	1
Austria	1
Cameroon	1
Colombia	1
Brazil	1
Cote d'Ivoire	1
Ukraine	1
Iraq	2
Israel	1
Egypt	1
Germany	1
Russia	1
Japan	2
Romania	2
Netherlands	1
Jordan	1
Tunisia	1
Kazakhstan	1

Official language of preference	Number of Members
English	3521
French	73

Racial identity (optional)	Number of Members
Not collected	3594

E. Data Notes

--

F. Applicant Profile

Profession Name	Total Number of Applicants
Optician	466

Gender	Number of Applicants
Male	139
Female	325
X (includes trans, non-binary, and two-spirit people)	2

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Other International	31	10
Other provinces and territories	118	35
Ontario	317	71

Country of Initial Training	Number of Applicants
Canada	435
India	20
Iran	1
United Kingdom	1
Australia	1
Hong Kong	3
Morocco	1

Nigeria	2
Philippines	2

Official language of preference	Number of Applicants
French	15
English	451

Racial identity (optional)	Number of Applicants
Not collected	466

G. Data Notes

The majority of applications with decisions pending as of December 31, 2024, were for applicants who submitted their applications in December 2024 and requested that their registration only take effect on January 1. Accordingly, registrations were issued on or after January 1, 2025 in accordance with these requests.

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
Other International	21	0	0
Other provinces and territories	94	0	0
Ontario	296	0	0

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	206	11
Intern Optician	205	10

J. Data Notes

--

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	0	0

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	0	0

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.