

Fair Registration Practices Report

Opticians (2014)

The answers that you submitted to OFC can be seen below.

This Fair Registration Practices Report was produced as required by:

- the Fair Access to Regulated Professions and Compulsory Trades Act (FARPECTA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPECTA
- 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.

Provision of Information About Registration Practices (1 / 13)

Describe how you make information about registration practices available to individuals applying or intending to apply for registration. Specify the tools used to provide information, and the manner in which you make that information available, current, accurate and user friendly in each of these subcategories:

a) steps to initiate the registration process

Information about the College of Opticians of Ontario's (the College/COO) registration process for non-accredited education applicants (Canadian and internationally educated individuals who have not graduated from an accredited and recognized opticianry program), nationally registered applicants (individuals applying under Ontario's Labour Mobility Legislation who are currently registered in another Canadian jurisdiction for a class of registration that is equivalent to the class of registration they are applying for in Ontario) and accredited education applicants (individuals who have graduated from or are currently enrolled in an accredited opticianry program recognized by the College) is readily available on the College website at www.coptont.org under the "applicant" tab. Regulations, by-laws and policies that govern the registration process, as well as registration flow-charts, application forms and guides are also posted on the website. The website is reviewed regularly for content accuracy. Every effort is made to present the information in plain language and in a user friendly format.

The College also provides information/application packages to applicants upon request (via e-mail, fax or mail). For non-accredited applicants, a staff member responds to initial inquires and provides prompt information about the process. Most inquiries are submitted by e-mail or phone. The College also participates in information sessions for new students at the two Ontario-based teaching institutions that offer NACOR (National Association of Canadian Optician Regulators) accredited and Ministry approved opticianry programs. Students may ask questions of the College representatives. We also encourage applicants to make an appointment if they wish to discuss the application process in person.

The College also conducts separate information sessions for Ontario-based opticianry students who are about to complete the educational program. The sessions are intended to explain the exam process, as well as the application process for applying for a certificate of registration as an optician upon successful completion of the national examinations.

b) requirements for registration

The requirements for registration for all classes (registered opticians, student opticians and intern opticians) and types of applicants (non-accredited, accredited and nationally registered) are posted on the COO's website, including the regulations, by-laws, registration policies and flow-charts that outline the requirements.

Once a registration inquiry has been received, an information package is sent to the applicant by email or mail or the applicant is directed to the website, as appropriate. The registration package contains a cover letter, information sheet(s) and application forms outlining the requirements for registration in more detail. Staff are always available to answer questions or provide any further information by e-mail, phone or mail. We also encourage applicants to make an appointment if they wish to discuss the application process in person.

The COO participates in information sessions for new students at the two Ontario-based teaching institutions that provide NACOR accredited and Ministry approved Opticianry programs. The sessions consist of a COO presentation providing general information about the College, the registration requirements and the national examination, followed by Q&A. Since the educational institutions play such an important role in providing information to students, the COO also maintains regular contact with the administration/program coordinators at the educational institutions (via mail, email, phone and in-person and regular meetings) to share important information relating to registration requirements, including any changes to the registration process and registration requirements.

The registration application packages are regularly reviewed for accuracy and ease of use. Should any policy or registration practice change, the information is promptly updated. We endeavour to use plain language wherever possible to explain the registration requirements.

c) explanation of how the requirements for registration are to be met, such as the number of years of schooling required for a degree to be deemed equivalent to an Ontario undergraduate degree, length and type of work experience, credit hours or program content

*** SAME AS LAST YEAR ***

Information about the College's registration requirements are posted on the website for all classes of registration and for all types of applicants. The application packages also contain this information. Each requirement is clearly outlined, such as the requirement that an individual seeking registration as a registered optician must provide evidence of education and training in the dispensing of **both** eyeglasses and contact lenses. Staff also provide registration information by telephone, e-mail, mail, or in-person upon request.

Applicants are advised in advance of any requirements that will be expected for future classes of registration. For example, it is a non-exemptible requirement for registration as a registered optician that 1000 verified dispensing hours be completed prior to registration. The College communicates this requirement to student and intern registrants on the College's website, in the student/intern application guide and while delivering information sessions at the educational institutions. Students are also provided with an application package that includes the application form, the guide, the Opticianry Act, the College by-laws (in which a number of requirements such as fees are outlined).

Students who complete their opticianry training at accredited educational institutions complete the practice requirement as part of their curriculum. (Accredited opticianry programs include a co-op component.) The College requires that completion of practice experience completed by accredited applicants is attested to by the supervising optician(s).

In the case of non-accredited education applicants, the same requirement for 1000 verified dispensing hours applies. The College ensures that non-accredited applicants are advised of this requirement in writing once the Registration Committee agrees to permit the individual to register with the College as a student (optional) or intern (mandatory). For non-accredited international applicants, the College will accept both Canadian and international experience towards the 1000 hour practice requirement. Submission of a notarized declaration by the applicant would serve as verification. The College also advises applicants that if they have not yet completed the required number of hours outside of Canada, that they should begin practicing under the

supervision or direction of a registered optician as soon as they are they are authorized by the COO to do so.

d) any education or practical experience required for registration that must be completed in Ontario or practice that must be supervised by a member of the profession who is registered in Ontario

The College does not have any regulatory requirement that stipulates that applicants must complete education or practical experience in Ontario. As described above, the College does have a practice experience requirement for applicants seeking registration as a registered optician.

Applicants who have completed opticianry education from an accredited institution based in Ontario will have completed the practice experience requirement in Ontario since this forms part of the curriculum in addition to it being a requirement of the COO. In the case of unaccredited graduates who have received their training and education outside of Canada, the practice experience requirement may be satisfied with either Canadian or international experience.

It is a requirement that **any** student or intern practicing in Ontario (regardless of where they received their education) is doing so under the supervision and direction of a registered member of the COO (or the College of Optometrists or Physicians and Surgeons).

The practice experience requirement does not apply to nationally registered applicants who are eligible for a certificate of registration as a registered optician under labour mobility legislation.

e) requirements that may be satisfied through acceptable alternatives

*** SAME AS LAST YEAR ***

In the case of non-accredited/internationally educated applicants who, for various reasons, are unable to provide documentary evidence of previous education or practice history, a written explanation and a statutory declaration indicating that the information they are providing about their education or practice history is true and accurate may be accepted in lieu. Information about this acceptable alternative is conveyed in a flow-chart, linked on the web page. The flow-chart outlines the requirements for registration for non-accredited education applicants and explains which requirements may be satisfied through alternative ways (ie. a statutory declaration). An applicant may also provide a detailed letter of explanation of his/her individual circumstances, letters from supervisors, employers, etc. The information on acceptable alternatives is posted on our website and available upon request via in-person, phone, fax, e-mail or regular mail.

Individuals who graduate from accredited educational institutions usually do not have any difficulty in arranging for verifying documents. If this were to occur, the College would work with the applicant to arrange for an alternative form of documentation.

A primary example which demonstrates the College's flexibility with respect to alternative documentation is our experience with applicants from a non-accredited Canadian institution. The applicants were not able to provide a detailed course outline, which is normally necessary for the document assessment. The Registration Committee decided to accept the "Student Record" which the educational institution could readily provide. The "Student Record" document has since become the standard document expected for submission by students at this particular institution. The requirement for submission of the "Student Record" is detailed on the College's website and the application form and guides.

f) the steps in the assessment process

*** SAME AS LAST YEAR ***

The assessment process is explained in detail in the application package. The condensed version of the process is also outlined on the website. The registration staff are available to answer any questions by phone, email or in person. All of the College's written materials are reviewed regularly for currency of information.

g) the documentation of qualifications that must accompany each application; indicate which documents, if any, are required only from internationally trained applicants

Information about the documentation required of non-accredited applicants (internationally trained individuals) is available on the College's website and is included in the application package. This information is also provided by the registration staff over the phone, via e-mail, mail or in-person.

Non-accredited education applicants (both Canadian and internationally educated) are required to submit any diploma(s), certificate(s), course outlines and official transcripts. Non-accredited - internationally educated applicants are specifically required to submit WES course-by-course evaluation and language proficiency test results (if education not completed in English/French). Again, if obtaining these documents would cause undue hardship to the applicant, there are alternative ways of proving the applicant's credentials as described.

h) acceptable alternatives to the documentation if applicants cannot obtain the required documentation for reasons beyond their control

*** SAME AS LAST YEAR ***

There is a link to a flow-chart and instructions on the College's website outlining the process and requirements for non-accredited education applicants. The flow-chart provides details on acceptable alternatives to documentation if the applicant cannot obtain the required documentation for reasons beyond his/her control. The Registration Committee will accept a statutory declaration from the applicant in lieu of missing documents. The applicant may also submit a detailed letter explaining his/her circumstances, letters from employers, etc., in addition to the statutory declaration. The initial application package also outlines the process.

The registration staff also provide the information on acceptable alternatives upon request, by phone, e-mail, mail or in-person.

i) how applicants can contact your organization

The website lists contact information for the College's registration staff, including name, title, e-mail address and telephone extension. This information is regularly reviewed and updated. Applicants are welcome to contact the College by e-mail, mail, fax, telephone, and are encouraged to make appointments if they wish to attend in person. Applicants can meet with the coordinator or manager.

The cover letter of the application package also includes the name, e-mail address and extension of the staff person the applicant can contact for any questions or information.

j) how, why and how often your organization initiates communication with applicants about their applications

*** SAME AS LAST YEAR ***

The College regularly contacts applicants verbally or in writing to advise if an application is incomplete, and to request additional information or documentation. The College also contacts applicants by phone or email to advise when a certificate of registration has been issued.

The College initiates written correspondence upon receipt of applications from non-accredited education applicants whose applications require consideration by the Registration Committee. Once all required documents are received, non-accredited education applicants (Canadian or internationally educated) are advised that their file will be presented to the Registration Committee. In accordance with the Regulation, applicants are advised of their right to make written submissions to the Registration Committee within 30 days. Following the Registration Committee meeting, the applicant will receive a letter advising them of the decision of the Registration Committee. A verbal update regarding the Committee outcome is also provided to applicants upon request.

The College has developed a Registration Timeline Policy, which is posted in the Applicant section of the website. The policy provides a guide for applicants on how long their applications may take to be reviewed and processed. Information about timelines is also provided verbally and in written correspondence to applicants.

k) the process for dealing with documents provided in languages other than English or French

*** SAME AS LAST YEAR ***

The College requires documents be translated into English or French. This information is provided in the initial application package, on the website and by phone, e-mail, mail or in-person. The College, however, endeavors to be flexible and reasonable, and may accept a photocopy of a translated document if the circumstances warrant it.

l) the role of third-party organizations, such as qualification assessment agencies, organizations that conduct examinations or institutions that provide bridging programs, that applicants may come into contact with during the registration process

The COO's key third-party organizations are NACOR (National Association of Canadian Optician Regulators), WES (World Education Services) and NAIT (Northern Alberta Institute of Technology). Information about third party organizations is posted on the College's website and in the College's application packages. This information may also be obtained by corresponding directly with the COO, either by telephone or email.

All applicants for registration as a registered optician, with the exception of nationally registered applicants applying under Labour Mobility Legislation, must pass the National Eyeglass and the National Contact Lens Examination. The exams are administered nationally by NACOR, and are accepted by all provincial opticianry regulators with the exception of Quebec. The exam administration is facilitated by the College. Information about NACOR and the examination process is posted on the COO website and included in the application and examination packages sent to eligible candidates.

For non-accredited internationally educated applicants, the College requires a course-by-course evaluation by WES. Applicants are advised of this requirement on the College website and in the application package. Applicants contact WES directly and bear the costs of the evaluation.

The Registration Committee assesses the knowledge and skill of applicants who have not obtained opticianry education from an accredited institution. If the Committee determines that the applicant has demonstrated gaps in knowledge and skill it will require that the applicant complete a specified bridging program which corresponds to the areas of deficiency. Applicants are advised in advance of the possibility of having to complete bridging or additional training as a result of the assessment process. This information is posted on the COO website, and is relayed to applicants in subsequent verbal and written communications.

The length of the bridging program depends on the applicant's individual needs as determined by the Registration Committee after an assessment. The bridging courses ordered by the Registration Committee are offered online by NAIT. If an applicant is required to complete any bridging courses with NAIT, the applicant is provided with information about NAIT in the decision letter, along with the relevant course codes and how to apply. NAIT's opticianry program is accredited by NACOR.

It should also be noted that applicants who were not educated in English or French must also provide evidence of the level of language proficiency. The College accepts a number of language proficiency tests according to the policy that is made available to the applicants at the beginning of the process through the website, application package and the information provided by staff.

m) any timelines, deadlines or time limits that applicants will be subject to during the registration process

The College has a comprehensive Registration Timelines Policy which is posted on the website. Information about the timelines are included in the application packages. These timelines are reiterated through the subsequent verbal and written interactions between applicants and staff throughout the registration process.

n) the amount of time that the registration process usually takes

*** SAME AS LAST YEAR ***

As noted, the College has a comprehensive Registration Timelines Policy. The policy provides a guide for applicants on how long the application will take to be reviewed and processed by staff and the Registration Committee.

This information is communicated to prospective applicants in the application package, through the website and in any telephone or written interaction with staff. This information is repeated and clarified as necessary throughout the application process.

The amount of time the registration process takes will also depend, to a great extent, on the time the applicant needs to gather and submit his/her documentation.

o) information about all fees associated with registration, such as fees for initial application, exams and exam rewrites, course enrolment or issuance of licence

All the fees are outlined in the College of Opticians' Fees By-Law, which is posted on the College's website. A detailed fee schedule for all class and category of applicants and members is also posted in the 'Becoming an Optician' and 'Member' section of the website.

The fee structure is also explained in the initial package the applicant receives. At every step thereafter, the fees are again outlined in the written communication with the applicant, as well as over the phone/e-mail/ in-person and on the website.

Non-accredited education applicants are informed of all all potential fees associated with assessment and registration on the web-page in an easy-to-read table format.

p) accommodation of applicants with special needs, such as visual impairment

The College has an Accommodation of Special Needs Policy which is posted on the website in the Resource/Policies section of the website.

The College does not receive this type of request very often and deals with them on a case-by-case basis. Every reasonable effort is made to accommodate such an applicant (ie. meeting in person, assistance with completing of forms, etc).

If a special accommodation is requested with respect to registration exams (ie. more time allowed per exam section or frequent breaks in between the exam sections), accommodations may be approved. All exam candidates are directed to the NACOR Candidate's Examination Handbook upon application. As clearly outlined in the handbook, the process for applying for special consideration during exams is as follows:

"If you require any special considerations during your examination due to disability, temporary illness, or extenuating circumstances, a written letter to NACOR outlining your specific request along with the reasons for the request must be included with your application form. All pertinent information such as medical documents must be included with your request. Requests will be reviewed and acted upon by the National Examinations Committee. Any decision reached by the National Examinations Committee is final." National Examinations Committee (NEC) is a Committee of NACOR.

Although the decision whether to accommodate such an applicant is made by the NEC of NACOR, the College is consulted and involved in the process.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

In 2014, the Registration Committee began the process of establishing a schedule of dates for the interview component of the Prior Learning Assessment and Recognition (PLAR) process in advance for the year, with one interview date scheduled approximately every three months. These dates are published on the College's website and are communicated to applicants verbally and in writing. This process improvement increases transparency and fairness, since the timeline for progression of the assessment process is clearer to applicants.

The COO also updated its website to include a "Have a question? Ask Us!" button that appears on the menu of each web page (excepting the landing page). This allows applicants and members to quickly email the College with any type of query without having to navigate the entire site.

Amount of Fees (2 / 13)

Are any of the fees different for internationally trained applicants? If yes, please explain.

All fees for non-accredited internationally educated applicants are communicated on the College's website. The fees are also indicated in the application package, and are communicated via phone, e-mail, in person appointments and walk-ins. Any fee that would be required in the future (such as the assessment fees) are communicated to applicants in advance; verbally and in writing.

Applications from individuals who have obtained opticianry education from an unaccredited educational institution (both Canadian and international), are subject to a non-refundable application fee of \$150.00 (plus HST). These applications require review by the Registration Committee.

Applications from individuals who have obtained opticianry education from an accredited educational institution are also subject to a non-refundable application fee, the cost of which depends on the class of registration being applied for. These applications do not require review by the College's Registration Committee and are processed by the College's Registration staff.

If the Registration Committee agrees to assess the prior learning and competency of an unaccredited education graduate (both Canadian and international), there is also a fee of \$600 (plus HST) per eyeglass or contact lens assessment. This fee includes the cost of an on-line competency gap analysis and the interview with an interview panel.

Non-accredited - internationally educated applicants also bear the costs of the WES evaluation of their credentials (course-by-course) and/or any language proficiency testing they need to complete if they have not received educated in English or French.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

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Provision of Timely Decisions, Responses and Reasons (3 / 13)

a) What are your timelines for making registration decisions?

Registration decisions are made on all applications for registration within 4 to 8 weeks of receiving a fully completed application form, regardless of the type of applicant (ie. nationally registered, non-accredited or accredited applicant). If all the documentation is in order, processing time may be shorter (ie. 3-4 weeks). In order to expedite the process for applications requiring Registration Committee review, the Committee will often assess applications via teleconference meeting rather than waiting for a scheduled in-person meeting.

Longer timelines for making registration decisions are usually as a result of incomplete application information from the applicant or if applications for registration are received in "bulk." Peak processing periods typically

occur after an examination session or when applications are received around the College's annual registration renewal period from December-February.

b) What are your timelines for responding to applicants in writing?

For a general inquiry via email, an applicant can expect a response within one to two business days. Requests for application packages are sent out within a week. The exception would be a very complex case that may require legal advice or consulting an external person.

c) What are your timelines for providing written reasons to applicants about all registration decisions, internal reviews and appeal decisions?

For non-accredited education applicants whose applications require consideration by the Registration Committee, formal written notification of the decision usually follows within 5 -10 business days of the Committee meeting. Staff will also verbally advise the applicant regarding the Registration Committee's decision, upon request. Registration Committee decision letters include information on how to appeal the decision and to whom (ie. Internal Registration Appeal Panel or HPARB). If the applicant wishes to appeal, he/she is invited to submit additional documents or provide additional information within 15 days of receiving the decision.

Accredited education/nationally registered applicants are advised of the approval of their registration application by phone or email within 1-5 days following the issuance of the certificate of registration. An official confirmation of registration package follows by mail, however, members can start practicing on the official date of registration.

d) Explain how your organization ensures that it adheres to these timelines.

All applications and documentation are date-stamped upon receipt and entered into the College's database. Applications are processed as received. The dates of each step in the registration process are tracked in the database so that staff can easily reference and advise applicants about the status of an application. The manager is able to generate reports in the database, and frequently does so, to ensure that timelines are being met. Additional temporary staff are also hired during the College's peak processing time in order to provide assistance to permanent staff in meeting timelines. If an applicant requests that issuance of the certificate of registration be expedited for a specific reason, registration staff make every effort to accommodate.

Applicants who have obtained education from an unaccredited opticianry program require consideration by the College's Registration Committee. The Registration Committee typically meets every 2-3 months or more frequently if required, as determined by the caseload and the College's timelines. In order to expedite decision making, the Committee frequently meets by teleconference meeting. Following a Registration Committee meeting, issuing registration decision letters takes priority, and is tracked by the manager. Applicants are also advised prior to the meeting they may receive verbal confirmation of the decision following the meeting upon request.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

In 2013-14, the College migrated its data to a new membership database system, which has improved the

automation of reporting and tracking of applications.

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Access to Records (4 / 13)

a) Describe how you give applicants access to their own records related to their applications for registration.

Applicants have full access to their registration records upon written request. The applicant's file would be available for review and photocopy provided an appointment is made with the registration staff upon a written request.

With respect to non-accredited education applicants who undergo an assessment by the Registration Committee regarding previous knowledge (the PLAR process), the applicant may receive a copy of the competency gap analysis scores and a copy of the interviewer recommendation report upon written request once the full assessment process is complete. To protect the integrity of the PLAR assessment process, the applicant may not receive any documentation which would disclose any questions in the assessment bank.

b) Explain why access to applicants' own records would be limited or refused.

The file is reviewed to determine if there are any documents or information that might jeopardize the safety or privacy of any other person. If so, the Registrar (or designate) may choose to exclude this information in the applicant's file. As noted above, in the case of Registration Committee assessment applications, applicants would not be provided with any materials that disclose questions in the PLAR assessment bank.

c) State how and when you give applicants estimates of the fees for making records available.

*** SAME AS LAST YEAR ***

There are no fees charged for access to records.

d) List the fees for making records available.

*** SAME AS LAST YEAR ***

There are no fees charged for access to records.

e) Describe the circumstances under which payment of the fees for making records available would be waived or would have been waived.

*** SAME AS LAST YEAR ***

There are no fees charged for access to records.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

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Resources for Applicants (5 / 13)

a) List and describe any resources that are available to applicants, such as application guides, exam blueprints or programs for orientation to the profession.

Application packages (for all classes of registration) contain a link to the online registration application guide which outlines the registration application process and required documents (the registration guides are also available for download on the website). Applicants and members are also provided with the link to the website to download the Opticianry Act, Regulations, By-Laws and Standards of Practice and Registration Policies. Applicants whose application requires consideration by the Registration Committee receive a customized letter with the applicable policies enclosed. International applicants are also directed to the National Competencies for Canadian Opticians document, which form the basis of the prior learning assessment and recognition (PLAR) program and the national examinations.

Intern opticians are directed to the national examination handbook, which provides very detailed information about the examination format and structure, in addition to the examination policies.

The College website offers a great deal of information for all classes of registration (under the 'Becoming an Optician' tab). Downloadable flow charts of the different registration "paths", description of processes and requirements, contact information and areas of responsibility for all staff members, important documents (for example, the National Competencies, Registration Regulation, By-Laws, Registration Policies, etc) are all posted on the website.

b) Describe how your organization provides information to applicants about these resources.

The College website is user-friendly and easy to navigate and the information is provided in a clear manner under the tab entitled "Applicant".

The contact information for all staff members (including name, position, e-mail address and extension) is posted on the website, so that potential applicants can easily contact the College to request any information. Applicants are also informed of available resources via e-mail, phone or in person upon request.

The College offers examination, registration and professional responsibility sessions to students in the Ontario NACOR accredited and Ministry approved opticianry programs.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

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Internal Review or Appeal Processes (6 / 13)

In this section, describe your internal review or appeal process. Some regulatory bodies use these two terms (*internal review* and *appeal*) for two different processes, some use only one of these terms, and some use them interchangeably. Please use the term that applies to your profession. If you use both terms (for two different processes), please address both.

a) List your timelines for completing internal reviews or appeals of registration decisions.

A three member Registration Appeal Panel (RAP) is constituted by the College's Council at the beginning of each year, at the same time the Registration Committee composition is set. The RAP consists of two optician members and one public member (minimum composition), who are different individuals from those that sit on the Registration Committee. An applicant has 15 days from the receipt of the Registration Committee's original decision to file an internal appeal to the RAP.

The RAP meets on an as-needed basis, when an appeal of a decision from the Registration Committee has been filed. Once the appeal has been filed, the RAP will meet within 2 to 3 weeks to conduct its review. A decision is rendered at the meeting and the written decisions and reasons are finalized and issued to the applicant within 2-3 weeks of the meeting.

The decisions of the RAP may be appealed to HPARB within 30 days of the receipt of the decision.

i. State the number of internal reviews or appeals of registration decisions that exceeded your timelines.

In 2014, there was one internal review of the decision of the Registration Committee. The RAP upheld the original decision of the Registration Committee. There were no registration appeals to HPARB in 2014.

ii. Among internal reviews or appeals that exceeded your timelines, state the number that were from internationally trained applicants.

The internal review considered by the RAP in 2014 was **not** filed by an internationally trained applicant.

b) Specify the opportunities you provide for applicants to make submissions regarding internal reviews

or appeals.

The internal appeal is paper-based. The applicant may provide additional materials/documents at any time, but is formally invited to submit any additional materials with the RAP within 15 days from the day they receive the decision and reasons from the Registration Committee. The cover letter details the process and timelines for the internal appeal.

c) Explain how you inform applicants about the form in which they must make their submissions (i.e., orally, in writing or by electronic means) for internal reviews or appeals.

Submissions from applicants are requested to be in writing, in an e-mail/fax/letter format. Applicants are informed of the appeal process in the cover letter that accompanies the decision and reasons of the Registration Committee. The review is paper-based; there is no opportunity for the applicant to present orally.

d) State how you ensure that no one who acted as a decision-maker in a registration decision acts as a decision-maker in an internal review or appeal of the same registration decision.

The three-member Registration Appeal Panel is completely separate from the Registration Committee. The RAP consists of two optician members and one public member. The RAP only meets if there is an internal appeal filed. Members of the RAP cannot be involved in any prior decision making. The Panel's composition is determined by the College's Council.

The members of the RAP receive a detailed orientation which includes all registration requirements and processes, as well as the RAP's role in the process.

e) Describe your internal review or appeal process.

As described above, the applicant is advised of his/her right to appeal the decision of the Registration Committee to the RAP in the cover letter that accompanies the decision and reasons of the Registration Committee. The deadline is 15 days from the receipt of the decision and reasons. The applicant is invited to make any additional submissions and submit any additional documents. The RAP meeting is scheduled within 2-3 weeks. The review is paper-based and the RAP issues a written decision and reasons to the applicant. The applicant may appeal a RAP decision to HPARB within 30 days of the receipt of the RAP decision.

f) State the composition of the committee that makes decisions about registration, which may be called a Registration Committee or Appeals Committee: how many members does the committee have; how many committee members are members of the profession in Ontario; and how many committee members are internationally trained members of the profession in Ontario.

The Registration Committee is a statutory committee that must consist of at least 2 elected professional optician members (Council members), 1 public appointed member, and up to 3 appointed optician members who are not members of Council. In 2014, the Committee had five members.

The Registration Appeals Panel is comprised of a minimum of 3 members, with at least one being a member of

Council, at least one being a public member, and up to 3 members who are appointed optician members who are not members of Council. In 2013, the RAP had 4 members.

The 2014, Registration Committee did not have any Committee members that were internationally trained professionals.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

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Information on Appeal Rights (7 / 13)

This section refers to reviews or appeals that are available after an internal review or appeal. Describe how you inform applicants of any rights they have to request a further review of or appeal from a decision.

*** SAME AS LAST YEAR ***

After the internal appeal route has been exhausted by the applicant, he/she has the right to appeal the RAP decision to HPARB. The cover letter informing the applicant of the decision of the RAP (the decision and reasons are attached) includes a paragraph informing the applicant of his/her right to request a review of (file an appeal of) the RAP's decision to HPARB.

The information provided in the cover letter includes the name of the appeal body (HPARB), the address and phone/fax number, as well as the section number of the RHPA that provides for appeal rights and the deadline by which a possible appeal must be filed with the HPARB - 30 days from the receipt of the decision.

The applicants are also informed that registration decisions are appealable on the website - on the 'Non-Accredited Education Applicant' webpage.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

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Assessment of Qualifications (8 / 13)

This category covers your processes for assessing all qualifications, such as academic credentials, competencies, language ability or practical experience.

a) List the criteria that must be met in order for an applicant's qualifications to satisfy the entry-to-practice requirements for your profession.

Accredited Education Applicants are individuals who have graduated from an opticianry program accredited by NACOR, approved by the MTCU or deemed equivalent by the Registration Committee. In order to meet the qualification for registration as a registered optician, accredited educational applicants, in addition to completion of the accredited education, must have successfully completed the National Eyeglasses and the National Contact Lenses exam (the national exams) and have completed at least 1,000 hours of verified dispensing experience.

The teaching institutions provide the COO with a list of students that have met all the requirements for graduation. The student class of registration is optional; students may choose to register with the COO or may choose not to register and practice under supervision to the extent of section 29 of the RHPA. Upon receipt of the list of graduates, students who are registered with the College are automatically issued a certificate of registration as an intern, which signals their eligibility to write the national exams. If a student chooses not to register with the COO, upon graduation, they must submit an application to the COO for intern status. Intern registration is not optional.

Intern opticians apply directly to NACOR to sit the national exams, however, the COO confirms the eligibility of potential exam candidates. Upon successful completion of the exams, intern opticians can apply to the College for a certificate of registration as a registered optician by completing the registration application form, submitting two photos, paying the application and registration fee and providing proof of having completed at least 1000 hours of verified dispensing experience under the supervision. Applicants must also provide a statutory declaration that they possess liability insurance coverage in the minimum specified amount and meet the general registration requirements (for example, proof of Canadian citizenship, permanent resident status or employment authorization under the immigration and refugee protection act) in order to be registered as a registered optician.

Nationally Registered Applicants are individuals who currently hold a certificate of registration as an optician or equivalent certificate from another Canadian province. If at the time of application, the individual is registered in good standing in another province to dispense **both** eyeglasses and contact lenses, the individual will be accepted for a certificate of registration as a registered optician in Ontario. In order to complete the application process, these applicants must arrange for a letter of good standing to be sent directly to the College, provide copies of their certificates of registration, complete an application form, submit two photos, pay the application and registration fee and provide a statutory declaration that they possess liability insurance coverage in order to be registered as Opticians.

Some provinces have a dual licensing system which provides for two separate licenses with different scopes of practice (eyeglass dispensing and contact lens dispensing). Ontario and Quebec have a combined licensing system, meaning that all opticians licensed in Ontario are authorized to dispense **both** contact lenses and eyeglasses. In the case of nationally registered applicants, who at the time of application, hold an out-of-province certificate to dispense eyeglasses **only** but not contact lenses, the individual will be accepted for a certificate of registration as a registered student optician in Ontario (optional), since the individual does not hold an out-of-province certificate that is equivalent to that which is being applied for in Ontario. As a requirement of registration, these applicants must be enrolled in an accredited opticianry program and working toward completion of contact lens education. For such registration applicants, a letter of good standing from the home province is required, along with a completed application form, two photos, and payment of the application and registration fee.

Non-Accredited Education Applicants (Internationally educated) are individuals who have received opticianry education from an international program which is considered non-accredited by the College/NACOR. Applicants may have received education outside of Canada as an optician, optometrist or ophthalmologist. Applicants must provide a completed application form, two photos, a course-by-course evaluation from WES, transcripts, any diploma(s) or certificate(s), information about the teaching institution and program they

graduated from, information on any licensing exam(s) they passed, whether they are licensed in their home country (if so a confirmation letter may be required from the regulatory body), statement of professional experience and proof of language proficiency as per the College's Language Proficiency Policy. Proof of language proficiency is only required from applicants who have not completed education in English or French.

Once approved by the Registration Committee, and upon completion of the prior learning assessment and recognition (PLAR) process, applicants become eligible to apply for a certificate of registration: either as an intern optician while they successfully complete the national exams OR as a student optician (optional) while they bridge the gaps in knowledge and skill identified in the assessment by completing a specified bridging program. Upon completion of the bridging program, the applicant would be expected to then successfully complete the national exams.

When an applicant successfully completes the national exams, the applicant becomes eligible to apply for a certificate of registration as a registered optician following the same process as described for accredited graduates. In the case of internationally trained individuals, the College would accept any previous international experience toward the required 1000 hours of verified dispensing experience.

Non-Accredited Education Applicants (Canadian educated) are individuals who have received opticianry education from a Canadian program which is considered non-accredited by the College/NACOR. These applicants must submit all documents that are requested of internationally educated applicants, except for the WES assessment and proof of language proficiency. The process is the same for Canadian and international non-accredited opticianry graduates.

Once approved by the Registration Committee, and upon completion of the prior learning assessment and recognition (PLAR) process, applicants become eligible to apply for a certificate of registration: either as an intern optician while they successfully complete the national exams OR as a student optician (optional) while they bridge the gaps in knowledge and skill identified in the assessment by completing a specified bridging program. Upon completion of the bridging program, the applicant would be expected to then successfully complete the national exams.

When an applicant successfully completes the national exams, the applicant becomes eligible to apply for a certificate of registration as a registered optician following the same process as described for accredited graduates. In the case of individuals from non-accredited Canadian institutions, the College expects that the 1000 hours of verified dispensing experience would be completed in Canada.

The PLAR process is the same for all non-accredited applicants, regardless of the source of the applicant's education. The PLAR consists of: Registration Committee assessment of documents, competency gap analysis (CGA) and an in-person interview with a Panel. The Panel makes recommendations to the Registration Committee. On the basis of the foregoing, the Committee makes a final assessment of the applicant's knowledge and skill. The applicant may be: directed to take bridging program(s) (in which case, he/she is given the option of applying for a student optician license), take the registration exams (in which case, he/she is eligible to apply for an intern optician license), or enroll in an accredited program if serious gaps in knowledge and skill are found (eligible for an optional student optician license).

b) Describe the methodology used to determine whether a program completed outside of Canada satisfies the requirements for registration.

Non-accredited - internationally educated applicants are required to obtain an assessment of their academic credentials and a comparison to Ontario educational standards from World Education Services (WES). A course-by-course evaluation is required. This is a starting point of an assessment done by the Registration Committee. Decisions are made by the Registration Committee on a case-by-case basis. The Registration Committee ensures that there is consistency and equal treatment of applicants by reviewing previous

decisions. The Registration Committee assesses whether the program the applicant has graduated from meets the Entry-to-Practice, National Competencies for an Optician.

If the program and credentials are deemed to have only partially met the Entry-to-Practice Competencies, the applicant is required to undergo a prior learning assessment and recognition process which provides a snapshot of the applicant's knowledge and skill set. Upon completion of the PLAR process, depending whether gaps in knowledge and skills were demonstrated, the applicant is directed to complete additional training at an accredited institution or sit the registration exams before applying for a certificate of registration as a registered student, intern or registered optician, as applicable.

If the program and credentials are deemed to have met the Entry-to-Practice Competencies, the applicant may be directed to apply for a certificate of registration as an intern optician and challenge the National Exams directly. The process continues as described above.

c) Explain how work experience in the profession is assessed.

Non- accredited education applicants (Internationally educated) must provide a written declaration confirming the approximate number of hours of dispensing experience in their home country, as well as the approximate number of fittings completed, attested to by a previous supervisor. This previous practice experience can be used to demonstrate that the applicant meets the non-exemptible requirement for completion of 1,000 hours of verified dispensing experience. The College will only accept verified dispensing experience completed outside of Canada from non-accredited applicants who are internationally educated and were practicing as an optician in their home country. The Committee will accept a notarized declaration if the applicant is unable provide proof that the required hours were supervised by an optician.

d) Describe how your organization ensures that information used in the assessment about educational systems and credentials of applicants from outside Canada is current and accurate.

Non- accredited - internationally educated applicants must first submit their credentials to WES for evaluation on a course-by-course basis. The Registration Committee then evaluates whether the program the applicant completed meets the National Entry-to-practice competencies. The Committee relies on WES to confirm the authenticity of the applicant's credentials and the level of education compared to the Canadian system. WES is a reputable organization used widely in the regulatory world and it is highly specialized in the area of credential assessments.

The applicant is asked to provide a copy of his/her documents (course curriculum, transcript, information about the program and the teaching institution) to the Committee as well, and they are accepted from the applicant or from the school directly.

e) Describe how previous assessment decisions are used to assist in maintaining consistency when assessing credentials of applicants from the same jurisdictions or institutions.

Even though the document assessment is done on an individual basis, consistency in decision making for the applicants who graduated from the same institution at the same time is very important. A manager supports the work of the Registration Committee, and ensures that all relevant previous assessment decisions are brought to the attention of the Committee in order to maintain consistency and equal treatment of applicants when assessing credentials of applicants from the same jurisdiction/institutions.

f) Explain how the status of an institution in its home country affects recognition of the credentials of applicants by your organization.

*** SAME AS LAST YEAR ***

The Registration Committee relies on WES and the resources WES has at its disposal (an extensive database and research programs) to verify the authenticity of credentials. WES is a reputable non-profit organization that is well know for its services of evaluating international credentials.

g) Describe how your organization accommodates applicants with special needs, such as visual impairment.

The College endeavors to accommodate any reasonable requests for accomodation, and has developed a policy in this regard which is posted on the College's website. As noted in the policy, no single type of accommodation may be adequate or appropriate for all individuals with any given type of special need, therefore, accommodations will be individualized. This could include meeting in person with the applicant, corresponding with support person (i.e. a family member / interpreter), providing assistance with completing forms, etc. Special consideration requests occur infrequently in the registration area. Special accomodations are often requested for examination sessions. Requests are submitted directly to NACOR, and NACOR works with the COO to accomodate these requests.

h) State the average length of time required to complete the entire registration process, from when the process is initiated to when a registration decision is issued.

It is important to note that the typical length of time of the registration process from initial application through to registration varies greatly when it comes to different classes of registration and type of applicant (accredited, non-accredited or nationally registered). Sometimes the timeline is out of the College's control and will depend directly on the point in time the applicant submits the required documentation or payment.

Typical processing times are as follows:

Accredited Education Applicants: for a certificate of registration as a student optician: 4-8 weeks; as an intern optician once they graduate from their educational program:4-6 weeks; as a registered optician: 4-8 weeks once they have passed the National Examinations.

Nationally Registered Applicants: as a student optician and registered optician:4-8 weeks from the date of initial application.

Non-Accredited Education Applicants for a certificate of registration (internationally educated): varies greatly, depends on the point of time the applicant submits all documentation to be reviewed by the Registration Committee. Generally, however, the process takes from three months to one year from the time of initial application to assessment, decision and registration. During the assessment process, the applicant can schedule the CGA component at any time once the Registration Committee completes the initial document assessment. PLAR interviews are held approximately every three months.

If the applicant has been referred to a specified bridging program and registers as a student optician, the length of time is directly dependent on the number of bridging courses assigned by the Registration Committee. Individuals who are directed to bridging are not required to register as a student (but may do so, if they choose). This individual may commence the bridging program and begin practicing under supervision

without registering with the COO. Once the applicant has met all of the requirements and can apply for a certificate of registration either as a registered student, intern or optician, then processing time is 4-8 weeks.

Non-Accredited Education Applicants (Canadian educated): The registration process is markedly similar to internationally educated applicants, as these applicants also complete the prior learning assessment and recognition process. These applicants usually have no difficulty gathering the necessary documentation. The whole process from the time of application to receiving a registration decision from the Registration Committee may take 3-6 months, depending on when the applicant chooses to schedule the CGA component of the assessment. Here too, once the applicant has met all of the requirements and can apply for a certificate of registration either as a registered student, intern or optician, processing time is 4-8 weeks.

In order to manage expectations, the College indicates an average application processing time of 4-8 weeks in our communication to applicants. In reality, application processing time takes 3-4 weeks in most cases. It is important to note that for accredited and nationally registered applicants, longer processing times can occur when applications are received in "bulk". For example, after an exam session, it is quite possible for the College to receive 90-100 applications virtually at the same time. If this is the case, the College cannot meet the typical length of processing time of 3-4 weeks.

i. State whether the average time differs for internationally trained individuals.

Please see above - (h).

ii. If the average time differs for internationally trained individuals, state whether it is greater or less than the average for all applicants, and the reasons for the difference.

Please see above - (h). The process for assessing and evaluating non-accredited - internationally educated applicants is quite different from the process used for accredited education and nationally registered applicants and depends greatly on whether the required documents have been submitted. However, once all the documentation has been submitted and the conditions set by the Registration Committee are met, the processing time of the complete application is the same for all applicants.

i) If your organization conducts credential assessments:

i. Explain how you determine the level (e.g., baccalaureate, master's, Ph.D.) of the credential presented for assessment.

*** SAME AS LAST YEAR ***

This information is contained in the WES course-by-course evaluation report the College receives directly from WES.

ii. Describe the criteria that are applied to determine equivalency.

The Registration Committee assesses whether the program the applicant has completed meets the National Entry-to Practice Competencies for an Optician and whether it is comparable to programs accredited by MTCU/NACOR. If the program partially meets the competencies, the applicant may demonstrate his/her level of knowledge and skill by completing the prior learning assessment and recognition process which will

identify any gaps in judgment, skill and knowledge.

The entry-to-practice competencies are developed nationally and adopted by each provincial regulator. The MTCU/NACOR accredited opticianry programs use the competency profile to develop curriculum. NACOR uses the competencies to construct the national opticianry examinations. The National Competencies were comprehensively reviewed and updated in 2013.

iii. Explain how work experience is taken into account.

The Prior Learning Assessment and Recognition process provides the Registration Committee with the tools to assess the prior learning of applicants, obtained in both academic and workplace settings. Each type of knowledge is very relevant in establishing an individual's competency. Through the PLAR, the applicant has the opportunity to demonstrate his/her practical knowledge, skill, and experience in opticianry, particularly during the interview portion of the assessment. Also, the applicant's written declaration regarding his/her work experience and number of hours of dispensing experience and number of fittings are always taken into account in the Committee's deliberations.

j) If your organization conducts competency assessment:

i. Describe the methodology used to evaluate competency.

A non-accredited applicant's program contents (via the course outline), length of the program, number of teaching/practical hours, etc. are compared to the Entry-to-Practice Competencies to determine if the competency requirements correlate. This way, the program is evaluated to determine if it is comparable to an approved program which teaches to the Entry-to-Practice Competencies.

If the program meets the competencies only partially, the Committee normally directs that the applicant undergo the prior learning assessment and recognition process. This process is comprehensive in determining an applicant's theoretical and practical knowledge and level of competency. The PLAR process consists of: a theoretical on-line competency gap analysis (CGA), a practical assessment of the applicant's contact lens insertion and removal skills and an in-depth in-person interview with the Panel. Based on all the results, the Panel makes recommendations to the Registration Committee and the Committee reaches a decision about the type of certificate that will be issued. In 2015, the practical insertion and removal portion of the PLAR will no longer form part of the assessment.

ii. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

Although the Entry-to-Practice Competencies are reviewed annually in conjunction with the national examination bank, the "National Competencies for Canadian Opticians" document underwent comprehensive, full scale review and validation which was completed in 2013. This work was undertaken in order to keep current with changes in the industry, legislation, technology and training. Optician content experts with national representation actively participated in this process. The COO was also represented on the project's steering committee.

The National Competencies provide guidance to the profession, they establish the minimum standards

expected of those practicing in the profession on a national level, and they provide the foundation for the educational curriculum, the national examination, and the competency assessment tools.

The PLAR is a competency assessment process based on the National Competencies. The PLAR was developed in 2010 and is in use on a national level, with the exception of Quebec. The bank of questions for the on-line competency gap analysis is regularly reviewed by content expert panels from British Columbia, Ontario and Alberta, which are the provinces that receive the most applicants. However, in light of the updated competencies, the provincial regulatory bodies in conjunction with NACOR have resolved to review the PLAR process and tools to ensure that they correspond to the amended competencies and are fair, transparent, objective and consistently applied across each jurisdiction. In 2013, the College, with the assistance of NACOR and the national opticianry regulators, began substantial revision to the PLAR tools.

In 2013, a steering committee was struck to begin revising the PLAR. The steering committee participated and oversaw the completion of the following activities:

- The existing competency gap analysis (CGA) questions were validated by a psychometrician to determine the reliability of the current multiple choice questions contained in the CGA.
- A blueprint and table of specification was created to prioritize the competencies and link them to the CGA and interview. This involved mapping exercises with optician content experts with national representation.
- Behavioural based interview (BBI) questions were developed by optician content experts with national representation.

The PLAR revision project continued in 2014. With respect to the CGA, a team of optician content experts with national representation developed a bank of new CGA questions, which were then subjected to two levels of validation by two separate groups of optician content experts. This included a modified-angoff process of validation.

In 2015, the newly developed questions will undergo pilot testing and final evaluation before becoming integrated into the PLAR process. With respect to the interview portion of the assessment, in 2015, interviewers will be provided with comprehensive training on the BBI tool. The steering committee will continue to revise the process and will oversee development of standardized scoring and scoring cues for each interview question, mapped to the performance indicators in the competencies to ensure objectivity and reproducibility. Objective cut scores will guide the Registration Committee in determining the applicant's performance. A interviewer training resource will also be developed.

iii. Explain how work experience is used in the assessment of competency.

The Registration Committee evaluates the program the applicant has completed against the Entry-to-Practice Competencies. If the competencies have not been met, or have been met only partially, the applicant must undergo a prior learning assessment and recognition process to further assess each applicant's individual competencies. Applicants with previous work experience have the opportunity to demonstrate their practical knowledge during the PLAR process, particularly in the interview section.

For all applicants, statements of any work experience form a part of the evaluation and are taken into account when the Registration Committee reaches its decision.

k) If your organization conducts prior learning assessment:

i. Describe the methodology used to evaluate prior learning.

In 2010, the College's Registration Committee adopted the Prior Learning Assessment and Recognition process (PLAR), which is a process in use across Canada (with the exception of Quebec).

By way of the PLAR process, non-accredited applicants may be accepted for registration if they have a combination of knowledge, skills, experience and abilities which are, in the opinion of the College's Registration Committee, substantially equivalent to the ones required for applicants who are granted registration in accordance with the regulation.

The PLAR consists of the competency gap analysis (CGA) and an in-person interview. The CGA is an on-line multiple choice assessment tool used to assess an applicant's previous knowledge against the entry-to-practice competencies. The in-person interview is conducted following the CGA. Interviewers engage the applicant in a series of interview questions to objectively assess the applicant's technical and problem solving skills. In 2014, the PLAR continued to include a practical insertion and removal portion, however, going forward, this will no longer form part of the assessment.

After an applicant has completed the assessment process, he/she may be directed to complete the National Exams or additional education or training as directed by the Registration Committee. Depending on the decision of the Registration Committee, the applicant would be eligible for a certificate of registration as a student (optional) or intern, which permits them to dispense under supervision while they work toward completing the requirements determined by the Committee.

A summary of the steps involved in the PLAR are as follows:

- An application is submitted to the Registration Committee.
- The Registration Committee conducts a preliminary assessment of the application (includes review of transcripts of formal education and course curriculum, examination(s), verification of professional experience, letters of registration or licensure (good standing), WES report, proof of language proficiency, resume of work experience, letters of personal reference and professional competence etc).
- The Registration Committee directs the applicant to complete an assessment (theoretical, practical and an in-person interview).
- The Registration Committee makes a final assessment all of the information obtained and issues its decision and reasons.

ii. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

The PLAR process is normally reviewed on a regular basis. As described above, the PLAR process and tools are undergoing complete review, revision and validation. This work was commenced in 2013 and will continue into 2015. Once revision of the assessment tools are complete, a further analysis will be conducted to validate the performance of the new tools.

iii. Explain how work experience is used in the assessment of prior learning.

All applicants are required to state how many hours of dispensing experience they have previously completed, as well as the approximate number of eyeglasses and contact lens fittings performed. This statement is considered when the Registration Committee assesses the applicant.

Applicants are provided the opportunity to demonstrate previous experience and practical knowledge obtained in the field during the PLAR, in particular, during the interview portion of the assessment, where practice based case studies are used to demonstrate application of practical experience.

l) If your organization administers examinations:

i. Describe the exam format, scoring method and number of rewrites permitted.

The College of Opticians facilitates the administration of the National Eyeglasses (EG) Exam and the National Contact Lenses (CL) Exam.

The exams are administered by the National Association of Canadian Optician Regulators (NACOR). Nine provincial regulatory bodies, including the College of Opticians of Ontario, use the NACOR exams as a pathway to registration.

The National EG exam measures 40 areas of competence broken down into five sections with 135 enabling objectives. One of the sections is knowledge-based and four are skill-based with clinical judgment-based subsets. Within the five sections there is the possibility of achieving 236 marks. The passing mark is 145 marks or 61%. If a candidate fails the eyeglass examination they must repeat the entire examination.

The National CL exam measures 30 areas of competence broken down into five sections with 125 enabling objectives. One of the sections is knowledge-based and four of the sections are skill-based with clinical judgment-based sub-sets. Within the five sections there is a possibility of achieving 216 marks. The passing mark is 147 marks or 68%. If a candidate fails the contact lens examination they must repeat the entire examination.

A candidate is entitled to challenge a NACOR exam a maximum of three times. After the third unsuccessful attempt, the candidate must comply with an approved upgrading program (by the Registration Committee) before any further challenge of the exam is permitted. In order to become eligible to apply for registration as an Optician in Ontario, the applicant must successfully complete both the National Eyeglasses and the National Contact Lenses exam.

ii. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

Critical to the reliability of examination results is the method by which the pass mark is established. The method used by the National Examination Committee (NEC) of NACOR to establish the pass mark for the examinations is the modified Angoff method. Using this method each component of the examination is isolated. The examinations are regularly reviewed by a panel which consists of representatives of each province that administers the exams. Each member of the examination review panel is asked the question, If 100 candidates of entry level competence were to answer this question, what percentage of candidates would get the correct answer? If there is a divergence in opinion of more than 30%, those delegates estimating at the high and low end of the spectrum are required to provide a rationale to defend their estimation. A second poll is taken, and a third until all delegates have rethought and realigned their assessment and are satisfied in validity of their pass marks. Assessment Strategies uses the data collected to establish the pass mark for the examination.

The NEC met a minimum of four times a year during the development phase of the examinations and continues to meet once a year to evaluate results and make modifications to the exam bank or as required. Every province (including Ontario) that administers the exam has a representative on the examination review panel.

iii. State how often exam questions are updated and the process for doing so.

*** SAME AS LAST YEAR ***

Please see the above answer - ii.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

1) As described in detail above, the PLAR process, including the assessment tools, are undergoing substantial review, revision and validation. This work, begun in 2013 and continuing into 2015, will result in a more standardized, objective, fair, transparent process, which is consistently applied in each jurisdiction administering the assessment. As noted above, in 2015, the practical insertion and removal portion of the PLAR will no longer form part of the assessment.

2) In May 2014, the College's council approved amendments to the Language Proficiency Policy. The amendment was in response to a report by the College of Opticians of Manitoba (funded by the Manitoba Fairness Commissioner), which examined the English language demands specific to the profession of opticianry for the Canadian Language Benchmark (CLB) language test. Accordingly, these proven benchmarks were incorporated into the College's policy. The benchmarks were also accepted on a national basis.

3) In May 2014, the College's council approved amendments to the College's Upgrading policy for applicants who have exhausted their examination eligibility. While the substance of the policy did not change, the policy was clarified, and additional details about upgrading and examination eligibility not previously included in the policy (but available in other areas of the College's website and applicant correspondence) were included in the amended policy. The purpose of the amendment was simply to streamline all the necessary information into one policy document.

4) The Registration Committee began the process of setting in advance four interview dates for the PLAR process. The dates are published on the website and are regularly communicated to applicants, as early as an applicant's initial inquiries regarding the application process. This process improvement increases transparency of the process and allows applicants to better understand and plan the progression of their application.

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Third-Party Organizations (9 / 13)

a) List any third-party organizations (such as language testers, credential assessors or examiners) relied upon by your organization to make assessment decisions.

*** SAME AS LAST YEAR ***

Language Testers:
TOEFL, Canadian Language Benchmarks, MELAB, IELTS, TestCan

Credential Assessors:
WES

Examiners:

NACOR (National Association of Canadian Optician Regulators), more specifically, the NEC (National Examinations Committee), a sub-committee of NACOR

b) Explain what measures your organization takes to ensure that any third-party organization that it relies upon to make an assessment:

i. provides information about assessment practices to applicants

Through regular review of the websites of third-party organizations, the COO ensures that relevant and current information is posted. Correct and current information about third-party assessments are also posted on the COO's own website, and in the application packages.

The COO maintains regular staff-to-staff contact with its third party organizations. In addition, the COO is also a member of NACOR's governing body, and has representation in the National Exams Committee (NEC).

ii. utilizes current and accurate information about qualifications from outside Canada

WES has done several presentations to the Registration Committee about the methods they utilize to ensure current and accurate information is used in their process. Their system/database is updated regularly and they frequently research conditions in foreign countries that affect education. WES is a reputable non-profit organization that is highly specialized and well know for its services of evaluating international credentials. As a research-based non-profit organization, WES stays abreast of developments in education and other educational authorities all over the world.

iii. provides timely decisions, responses and reasons to applicants

All NACOR policies pertaining to exam administration, including timelines for responses and decisions and reasons, are established and reviewed by the National Exam Committee (NEC). The composition of the NEC includes voting representatives from all participating provincial regulators, including Ontario. NACOR's examination policy, which is communicated to exam candidates well in advance of the exams, outlines the eight-week exam result communication policy. This benchmark is also verbally communicated to candidates on the day of the examination by the examination moderator.

Exam candidates and the COO are notified of the exam outcomes simultaneously; the College receives a master list of exam results for all exam candidates as soon as the result letters are provided to candidates. The COO, therefore, can readily determine whether examination results have been provided by NACOR in accordance with the benchmarks.

iv. provides training to individuals assessing qualifications

*** SAME AS LAST YEAR ***

N/A

v. provides access to records related to the assessment to applicants

*** SAME AS LAST YEAR ***

N/A

vi. accommodates applicants with special needs, such as visual impairment

We ensure that any applicant with special needs is given all reasonable consideration.

NACOR has a written policy in place regarding requests of this nature and will work closely with the College of Opticians in each individual case to ensure fairness and objectivity:

"If an applicant requires any special consideration during the examination due to disability, temporary illness, or extenuating circumstances a written letter to NACOR outlining the applicant's specific request along with the reasons for the request must be included with the application form. All pertinent information such as medical documents must be included with the request. Requests will be reviewed and acted upon by the National Examination Committee (of NACOR). Any decision reached by the National Examination Committee is final."

The policy is a part of the NACOR Candidate's Examination Handbook, the link for which is provided to all eligible exam candidates well in advance of the exam and is available on the NACOR website.

c) If your organization relies on a third party to conduct credential assessments:

i. Explain how the third party determines the level (e.g., baccalaureate, master's, Ph.D.) of the credential presented for assessment.

*** SAME AS LAST YEAR ***

WES relies on their research and extensive database information to conduct the credential evaluation process.

ii. Describe the criteria that are applied to determine equivalency.

*** SAME AS LAST YEAR ***

N/A

iii. Explain how work experience is taken into account.

*** SAME AS LAST YEAR ***

N/A

d) If your organization relies on a third party to conduct competency assessments:

i. Describe the methodology used to evaluate competency.

*** SAME AS LAST YEAR ***

N/A

ii. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

*** SAME AS LAST YEAR ***

N/A

iii. Explain how work experience is used in the assessment of competency.

*** SAME AS LAST YEAR ***

N/A

e) If your organization relies on a third party to conduct prior learning assessments:

i. Describe the methodology used to evaluate prior learning.

*** SAME AS LAST YEAR ***

N/A

ii. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

*** SAME AS LAST YEAR ***

N/A

iii. Explain how work experience is used in the assessment of prior learning.

*** SAME AS LAST YEAR ***

N/A

f) If your organization relies on a third party to administer examinations:

i. Describe the exam format, scoring method and number of rewrites permitted.

The national examinations are administered by the National Association of Canadian Optician Regulators (NACOR). Nine provincial regulatory bodies, including the College of Opticians of Ontario, use the NACOR exams as a pathway to registration. The National Examination Committee (NEC) is a working sub-committee of NACOR responsible for the development of examination content and policy. A COO representative is a voting member of the NEC.

The COO is responsible for facilitating the examinations in Ontario. Through this activity, the College has gained a thorough knowledge of how the examinations are administered, which provide us with assurance that the examinations are managed in a fair and objective manner.

The National EG exam measures 40 areas of competence broken down into five sections with 135 enabling objectives. One of the sections is knowledge-based and four are skill-based with clinical judgment-based subsets. Within the five sections there is the possibility of achieving 236 marks. The passing mark is 145 marks or 61%. If a candidate fails the eyeglass examination they must repeat the entire examination.

The National CL exam measures 30 areas of competence broken down into five sections with 125 enabling objectives. One of the sections is knowledge-based and four or the sections are skill-based with clinical judgment-based sub-sets. Within the five sections there is a possibility of achieving 216 marks. The passing mark is 147 marks or 68%. If a candidate fails the contact lens examination they must repeat the entire examination.

According to NACOR's examination policy, a candidate is entitled to challenge a NACOR examination a maximum of three times. After the third and each ensuing unsuccessful attempt, the candidate must comply with an approved upgrading plan as specified by the provincial regulatory body before any further attempt at the examination will be permitted.

ii. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

The NEC meets once a year to evaluate results and make modifications to content as required.

Critical to the reliability of examination results is the method by which the pass mark is established. The method used by the National Examination Committee (of NACOR) to establish the pass mark for the examinations is the modified Angoff method. Using this method each component of the examination is isolated.

The exams are reviewed by a Panel that consists of representatives of all the provinces that administer the exams. Each member of the examination review panel is asked the question, "If 100 candidates of entry level competence were to answer this question, what percentage of candidates would get the correct answer?" If there is a divergence in opinion of more than 30%, those delegates estimating at the high and low end of the spectrum are required to provide a rationale to defend their estimation. A second poll is taken, and a third until all delegates have rethought and realigned their assessment and are satisfied in validity of their pass marks. Assessment Strategies uses the data collected to establish the pass mark for the examination.

Examination Security and Integrity:

The NEC has developed a bank of questions. Each candidate receives an examination paper with a mix of questions that differs from other candidate's papers. In order to ensure uniformity of exam application, the NEC has developed candidate and examiner instructions for each section of the examination. Examinations are held in various locations throughout the country and NACOR sends an Examination Moderator to each sitting of the examination. The host province supplies a Chief Examiner as well as examiners and models for the

clinical portion of the exams. All examination papers are sent from the NACOR office to the Examination Moderator who transports them to the exam site, collects them upon completion of the examination and is responsible for returning the examinations to the NACOR office for marking.

iii. State how often exam questions are updated and the process for doing so.

The NEC met a minimum of four times a year during the development phase of the examinations and continues to meet once a year to evaluate results and make modifications to the exam bank as required.

Establishing a Pass Mark:

Critical to the reliability of examination results is the method by which the pass mark is established. The exams are reviewed by a national examination committee consisting of representatives from all the provinces that administer the exams. The method used by the National Examination Committee to establish the pass mark for the examinations is the modified Angoff method. Using this method each component of the examination is isolated. Each member of the examination review panel is asked the question, "If 100 candidates of entry level competence were to answer this question, what percentage of candidates would get the correct answer?" If there is a divergence in opinion of more than 30%, those delegates estimating at the high and low end of the spectrum are required to provide a rationale to defend their estimation. A second poll is taken, and a third until all delegates have rethought and realigned their assessment and are satisfied in validity of their pass marks. Assessment Strategies uses the data collected to establish the pass mark for the examination.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

As described in the previous section, the College's council approved amendments to the Examination and Upgrading Policy in order to streamline information to applicants in one policy document.

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Training (10 / 13)

a) Describe the training that your organization provides to:

i. individuals who assess qualifications

In 2014, the Registration Committee members, as well as the Registration Appeal Panel (RAP) members, were provided with training and orientation at the first meeting of the year by the manager. The presentation includes information about the Registration Regulation and Registration policies, as well as the Committee's duties and obligations under the RHPA. The RAP members receive an additional training segment which deals with their specific role and duties. The comprehensiveness of the orientation provided ensures that members exercise their decision making ability within regulatory and policy framework and in accordance with the principles of fairness, transparency, objectivity and impartiality.

All new Registration Committee members are supplied with a package of written material that provides an

overview of the process, all relevant legislation, by-laws, registration policies and information about third-party organizations. When selecting the composition of the Registration Committee each year, the College's Council ensures some continuity in membership. Accordingly, at any given time, the Committee is composed of some experienced members, which promotes consistency in decision making.

Additional training and ongoing guidance is provided on as needed basis. The COO is always seeking additional training opportunities for its Committee members and staff. For example, PLAR interview panel members and Registration Committee members are encouraged to attend a workshop on managing cultural differences, developed by the Ontario Regulators for Access Consortium specifically for individuals in the regulatory setting who interact with, or make registration decisions about internationally trained professionals. COO staff members involved in the registration process have also received this training.

In 2014, staff in the registration department, along with Registration Committee Chair, attended a learning-day organized by the Ontario Regulators for Access Consortium (ORAC), which included presentations by the Office of the Fairness Commissioner, the Ministry of Citizenship and Immigration, assessment experts and actual internationally trained professionals who have navigated the regulatory process.

ii. individuals who make registration decisions

*** SAME AS LAST YEAR ***

The Registration Committee members make registration decisions. They receive an orientation and training session at the first meeting every year, as described above.

iii. individuals who make internal review or appeal decisions

The Registration Appeal Panel members make internal appeal decisions as required. They receive an orientation and training session at the first meeting of the Registration Committee every year, as described above.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

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Agreements on the Recognition of Qualifications (11 / 13)

Examples of agreements on the recognition of professional qualifications include mutual recognition,

reciprocity and labour mobility agreements. Such agreements may be national or international, between regulatory bodies, associations or jurisdictions.

a) List any agreements on the recognition of qualifications that were in place during the reporting period.

*** SAME AS LAST YEAR ***

1. *Amendments made to the Colleges Registration Regulation in September of 2011, in accordance with the Agreement on Internal Trade.*
2. *Mutual Recognition Agreement Among Opticianry Regulators (MRA):* Ontario signed on the MRA in 2001. The MRA has now been signed by 9 of the 10 provincial authorities. They are: British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, New Brunswick, Nova Scotia, Prince Edward Island and Newfoundland and Labrador.

b) Explain the impact of these agreements on the registration process or on applicants for registration.

The College Registration Regulation was amended in September of 2011 in accordance with amendments to Chapter 7 (Labour Mobility) of the Agreement on Internal Trade which came into effect in 2009 to further eliminate or reduce measures that restrict or impair labour mobility in Canada. The College was already a party to a voluntary Mutual Recognition Agreement with the other provinces (except Quebec) prior to the application of Chapter 7 therefore there was virtually no impact as a result of these changes on our registration processes or on applicants registering with us. The new provisions allow for individuals who are licensed or registered in a Canadian jurisdiction where opticianry is a regulated profession under a class or category of registration that is similar to a class or category in Ontario to apply for a certificate of registration without having to undergo any material additional training, experience, examinations or assessments.

The purpose of the MRA is to establish the conditions under which an Optician who is licensed in one province or territory in Canada will have his / her qualifications recognized in another Province or Territory in Canada, which is a party to this Agreement. This means that an Optician who is currently licensed and who is deemed to be in good standing in their home province will be accepted for licensure in any other province or territory in Canada, which is a party to the MRA. However, all Opticians whose licensing is restricted to eyeglasses only and who wish to move to a province or territory with combined eyeglass and contact lens licensure (for example, Ontario) will be eligible for a temporary license as defined by the legislation of the receiving province or territory. The temporary license shall be issued for the sole purpose of permitting the applicant a reasonable time frame within which to fulfill the contact lens licensing requirements of the receiving province or territory. In Ontario, the temporary license is a Registered Student Optician (optional).

The College has also developed a policy on how to deal with Opticians from other provinces who do not hold both the eyeglasses and the contact lens license. In Ontario, there is no dual-licensing system. Ontario opticians are licensed for both the eyeglasses and contact lenses dispensing. Therefore, there is a material difference in the scope of practice between Ontario and Quebec on one side (combined license) and all other provinces (separate licenses). Subsequently, EG-only opticians in good standing from other provinces may register in Ontario as student opticians (optional) while they are in the process of completing their contact lenses upgrading. Once they pass the National Contact Lenses exam, they may apply for a full license in Ontario.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

Data Collection (12 / 13)

Languages in which application information materials are available

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

Language	Yes/No
English	Yes
French	Yes
Other (please specify)	

Paid staff employed by your organization

b) 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, 1 full-time employee and 1 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	11
Staff involved in appeals process	1
Staff involved in registration process	4

Countries where internationally educated applicants were initially trained

c) In the following table, enter the top source countries where your applicants¹ were originally trained in the profession (**excluding** Canada), along with the number of applicants from each of these source countries.

Enter the country names in descending order. (That is, enter the source country for the greatest number of your applicants in the top row, the source country for the second greatest number in the

second row, etc.)

Use the dropdown menu provided in each row to select the country.

Note that only one country can be reported in each row. If two or more countries are tied, enter the information for these tied countries in separate rows.

Country of training (Canada excluded)	Number of applicants in the reporting year
Iran	2
Egypt	2
Philippines	1
India	1
Italy	1
n/a	
n/a	
n/a	
n/a	
n/a	

¹Persons who have applied to start the process for entry to the profession.
 Select "n/a" from the drop-down list if you do not track this information. Enter "0" in a "Number of applicants" field if you track the information, but the correct value is zero.

Jurisdiction where members were initially trained

d) Indicate where your members² were initially trained in the profession (use only whole numbers; do not enter commas or decimals).

The numbers to be reported in the **Members** row are the numbers on December 31st of the reporting year. For example, if you are reporting registration practices for the calendar year 2009, you should report the numbers of members in the different categories on December 31st of 2009.

	Jurisdiction where members were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Members on December 31st of the reporting year	2207	272	5	33	104	2621

² Persons who are currently able to use the protected title or professional designation of the profession.

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

With migration to a new database, we are better able to capture membership information. Our old database contained some incomplete information, which accounts for the number of "unknown" members.

Applications your organization processed in the past year

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

from January 1 st to December 31 st of 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)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	164	27	0	7	1	199
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	29	9	0	3	0	41
Inactive applicants (applicants who had no contact with your organization in the reporting year)	0	0	0	0	0	0
Applicants who met all requirements and were authorized to become members but did not become members	0	0	0	0	0	0
Applicants who became						

FULLY registered members	107	8	0	2	0	117
Applicants who were authorized to receive an alternative class of licence³ but were not issued a licence	0	0	0	2	0	2
Applicants who were issued an alternative class of licence³	121	9	0	3	0	133

³ An alternative class of licence enables its holder to practise with limitations, but additional registration requirements must be met in order for the member to be fully licenced. Please list and describe below the alternative classes of licence that your organization grants, such as student, intern, associate, provisional or temporary.

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

NB. Student registration is an optional class of registration. Some individuals may be authorized to register for the student class as an alternative class of registration, but elect not to.

	Class of licence	Description
a)	Registered Student Optician	<p>Students enrolled in an opticianry program approved by MTCU or applicants who have applied to become registered as a registered optician or a registered intern optician and who are in the process of completing additional training as ordered by the Registration Committee may apply for a certificate of registration as a student optician. As noted, the class of student optician is considered to be an optional class of registration.</p>
		<p>In order to apply for a certificate of registration as an intern optician, applicants must have successfully completed and graduated from a MTCU approved opticianry program or one</p>

b)	Registered Intern Optician	deemed equivalent or if the applicant was ordered by the Registration Committee to complete additional training must have done so. Intern opticians are eligible to sit the national opticianry examinations.
c)		<input type="text"/>
d)		<input type="text"/>
e)		<input type="text"/>
f)		<input type="text"/>
g)		<input type="text"/>
h)		<input type="text"/>
i)		<input type="text"/>
j)		<input type="text"/>

Reviews and appeals your organization processed in the past year

f) 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 st to December 31 st 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	14	5	0	5	1	25
Applicants who initiated an appeal of a registration decision	0	1	0	0	0	1
Appeals heard	0	1	0	0	0	1
Registration decisions changed following an appeal	0	0	0	0	0	0

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

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Certification (13 / 13)

I hereby certify that:

- i. I have reviewed the information submitted in this Fair Registration Practices Report (the "Report").
- ii. To the best of my knowledge:
 - all information required to be provided in the Report is included; and
 - the information contained in the Report is accurate.

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

Title: Registrar

Date: March 10, 2014

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