

# BRIEFING NOTE

**TO:** Board of Directors

**FROM:** Registration Committee

**DATE:** December 4, 2023

**SUBJECT:** 14.1 Registration Policies for Content Review

For Decision

For Information

Monitoring Report

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**Purpose:**

To carry out a scheduled content review of registration policies to determine whether any amendments are necessary.

**Background:**

To ensure the policies remain relevant and continue to serve the College of Opticians' needs and objectives, the Registration Committee implemented a schedule to regularly review the content of the registration policies.

**For Consideration:**

The following policies were reviewed in Q4 by the Registration Committee:

1. **Internationally Educated Applicant Policy:** Amendments to this policy are proposed to improve readability and comprehension of the policy and to reflect the current assessment process for internationally educated applicants.

The proposed amendments also outline the next steps for the applicants based on the results of the initial review and include a new section that provides guidance to applicants who are unable to provide any of the required documents due to circumstances beyond their control (**see Appendix A**).

2. **Examination and Upgrading Policy:** The aim of the proposed amendments to this policy is to streamline the current process by outlining the path for exam candidates who made previous unsuccessful examination attempts as well as those with no previous exam attempts.

The proposed amendments also include detailed steps an exam candidate must take to regain their eligibility to sit the national examination(s) (**see Appendix B**).

3. **Retention of Legal and Verifying Documents Policy:** Amendments to this policy are proposed to improve readability and comprehension of the policy and to reflect the current document submission process for applicants and registrants (**see Appendix C**).

**Public Interest Consideration:**

With the public interest in mind, the Registration Committee has invested significant time and resources into reviewing and improving policies and processes relating to registration. Reviewing the content of registration policies ensures that they are consistent and effective, and that the College is up to date with current regulations and regulatory best practices.

**Diversity, Equity and Inclusion Considerations:**

No concerns from a diversity, equity or inclusion standpoint relating to these policies have been identified.

**Recommendation/Action Required:**

That the Board approve the proposed updates to the registration policies discussed above.

## REGISTRATION POLICY

### Internationally Educated Applicants

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An applicant seeking registration as a **Registered** Optician in Ontario, **who completed education related to opticianry** outside of Canada is considered an Internationally Educated Applicant.

To determine whether the applicant's knowledge and skill level meet the requirements of the core competencies of the profession, their application and supporting documents will be referred to the Registration Committee for review.

~~The Applicant must provide supporting documents as follows:~~

The Registration Committee uses the Prior Learning and Assessment Recognition (PLAR) process to assess the applicant's current level of knowledge and skills as it relates to the practice of opticianry. To meet the eligibility requirements for PLAR, the applicant must submit documents to support the following:

~~1. Academic Credentials Assessment: The applicant who was educated as an Optician outside Canada must have their academic credentials assessed and compared to Ontario educational standards. An assessment must be obtained from a credentialing body designated or approved by the Registration Committee.~~

1. that their academic credentials are related to the practice of opticianry and have been assessed against Canadian education standards by a credential evaluation agency approved by the Registration Committee. Specifically, applicants must undergo a World Education Services (WES) Course-by-Course Evaluation to determine the equivalency of their opticianry-related education in terms of Canadian education.

~~2. Verification of English or French Language Proficiency: The applicant must be able to read, speak and write either English or French with reasonable fluency, in accordance with the Language Proficiency Policy.~~

2. English or French language proficiency as set out in the Language Proficiency Policy.

~~3. Professional Background and Experience Information: The applicant's professional experience; license to practice in their home country; licensing examination enabling them to practice in their home country; continuing education information; other pertinent information relating to registration as an Optician in Ontario will be considered.~~

3. professional background and experience related to opticianry, where applicable.

A full list of the documents that applicants must submit with their application is available on the COO website.

If the applicant is unable to provide any of the required documentation due to circumstances beyond their control, the Registration Committee may consider accepting alternatives to the required documentation. An applicant must demonstrate that they have made reasonable attempts and are unable to access the required documents before acceptable alternative documentation will be considered.

~~Upon~~ After the initial review of the application and the supporting documents, ~~under the authority of the Regulated Health Professions Act, 1991(RHPA), the Panel of~~ the Registration Committee may direct the Registrar to do any or all of the following: will make a decision about whether the applicant is eligible for the PLAR process:

- ~~1.—Request the applicant undergo an assessment of their prior learning and experience. An assessment test is the tool the Committee uses to verify that the applicant’s current level of knowledge and skill in the practice of Opticianry is comparable to that of an applicant educated in Ontario. If the applicant is successful at the assessment test, they may apply for a certificate of registration as an Intern Optician and then proceed to attempt the National Registration Examination. The successful completion of the National Registration Exam is mandatory for all internationally educated professionals who wish to practice as Opticians in Ontario. Unsuccessful assessment test candidates will be advised by the Committee as to the additional training and upgrading they may obtain.~~
- ~~2.—Direct the applicant to attempt the National Registration Examinations. At this point, the applicant becomes eligible to apply for a certificate of registration as an Intern Optician. Upon successful completion of the registration examination, the applicant is eligible to apply for a certificate of registration as an Optician, or~~
- ~~3.—Refuse to issue a certificate of registration to the applicant.~~

~~The Applicant will be provided with reasons for the decision according to the requirements of the Health Professions Procedural Code, schedule 2 to the RHPA.~~

~~The applicant must have successfully completed certification examinations that have been set or approved by the Council or examination approved as equivalent.~~

Those eligible for the PLAR process will be required to undergo a Competency Gap Analysis (CGA), a multiple-choice computer-based assessment tool designed to assess the applicant’s achieved learning outcomes against entry-to-practice competencies set out in the National Competencies for Canadian Opticians.

Applicants who are determined not to be eligible for the PLAR process will be provided with reasons for not meeting the eligibility requirements including what gaps were identified in the application.

For applicants that proceed to the PLAR process, the Registration Committee will direct the applicant to do one of the following, based on the outcome of the CGA:

1. Take and pass the National Examinations.

2. Complete courses approved by the Registration Committee to bridge the knowledge gaps identified in the CGA;
3. Complete opticianry education at a Canadian accredited opticianry program.

## REGISTRATION POLICY

### Examination and Upgrading

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#### Examination Requirement

It is a non-exemptible requirement under Section 5 (1) 2. of Ontario Regulation 869/93, that any applicant for a certificate of registration as a Registered Optician must have,

“achieved a passing mark in each section of the College’s examinations, or must have successfully completed examinations which are deemed equivalent to the College’s examinations by the Registration Committee.”

The College of Opticians of Ontario (COO) recognizes the National ~~Association~~-Alliance of Canadian Optician Regulators (NACOR)’s National Examinations as the entry-to-practice examinations. Individuals must complete both the contact lens and eyeglass examinations in order to qualify for a certificate of registration as a registered optician in Ontario. The COO assists in the facilitation of the examinations.

#### Examination Eligibility

The COO determines the eligibility of examination candidates in Ontario. Applicants are deemed to be eligible for the examination in the following circumstances:

1. Accredited Education Candidates: Upon completion of opticianry training in both contact lenses and eyeglasses from an accredited educational institution. These candidates must also hold an active certificate of registration as a registered intern optician with COO.
2. Unaccredited Education Candidates: If exam eligibility is conferred by the Registration Committee after successful completion of a competency assessment and/or a specified bridging program. These candidates may obtain certificates of registration as an intern with COO.
3. Candidates Seeking Registration in Other Provinces: Upon confirmation of eligibility by the applicant’s home province. Examination results will be provided by NACOR to the home province.

#### Limits on Eligibility

Examination Candidates are permitted to attempt the National Examinations a maximum of three times within the three-year period from the time they gain eligibility. After three years, or three attempts, whichever comes first, a candidate’s certificate of registration as a registered intern optician will be revoked. ~~These candidates should reapply for intern status. After three years, or three attempts, all candidates must submit a request and upgrading proposal to the Registration Committee, which must be approved and completed to the satisfaction of the Registration Committee, before any further attempt of the examination will be permitted. The Registration Committee may require a candidate to complete upgrading and remediation.~~

The following steps must be taken in order for a candidate to once again become eligible to attempt the National Examinations after three years or three unsuccessful attempts:

1. **Eligibility following one or more unsuccessful attempts:** Candidates who attempted the National Examinations one or more times and were unsuccessful, must take the following steps to be eligible for further attempts:
  - a. Submit a **written request** to the College to be reissued a certificate of registration as an intern optician for the purpose of reattempting the National Examinations. This request should be submitted to [registration@collegeofopticians.ca](mailto:registration@collegeofopticians.ca);
  - b. Submit an **upgrading proposal** (together with the required review fee) that outlines the steps that will be taken by the candidate to address any gaps in knowledge. The upgrading proposal will be reviewed by the Registration Committee and must be approved before the candidate can move on to the next step.
  - c. Complete the upgrading requirements and submit **proof** of completion to the College. The upgrading requirements must be completed to the satisfaction of the Registration Committee.
2. **Eligibility following a three-year period (no attempts):** Candidates who did not attempt the National Examinations in the three-year period following the time they first became eligible may apply to be reissued a certificate of registration by taking the following steps:
  - a. Submit a **written request** to the College to be reissued a certificate of registration as an intern optician for the purpose of attempting the National Examinations. This request should be submitted to [registration@collegeofopticians.ca](mailto:registration@collegeofopticians.ca). The candidate should include details of any additional training or education relating to opticianry that they received during the period since they first became eligible to write the National Examinations.
  - b. The request will be reviewed by the Registration Committee, who may require the candidate to complete a Competency Gap Analysis and/or a refresher program. These requirements must be completed to the satisfaction of the Registration Committee.

### Upgrading Proposal Guidelines

~~An applicant requesting consideration of an upgrading proposal will be subject to the Registration Committee review fee.~~

~~The requirements for upgrading are at the discretion of the Registration Committee; however, the general upgrading guidelines are as follows:~~

The following guidelines apply to candidates who are required to submit an upgrading proposal in order to reattempt the National Examinations.

1. **Upgrading Proposal:** ~~An applicant may elect to submit an upgrading proposal to the Registration Committee which consists of~~ An upgrading proposal is a proposal that outlines the

steps a candidate will undertake to improve their knowledge. The proposal should focus on areas of the examinations where the candidate was unsuccessful or performed poorly. Upgrading steps may include mentoring, tutoring and/or upgrading courses offered by an accredited educational institution. Candidates should identify in their proposal the steps they propose to take and explain how these steps will address gaps in their knowledge.

2. **Upgrading Mentors/Tutors:** If an applicant wishes to pursue a tutoring or mentoring arrangement, the upgrading proposal should be developed by a mentor/tutor selected by the applicant. An acceptable mentor would be a registered optician or an optometrist in good standing, with appropriate knowledge, skill and judgement in the subject matter.
3. **Upgrading Hours:** Regardless of the type of proposal submitted, the Registration Committee usually expects an applicant to complete a minimum of 100 upgrading hours for each examination for which the applicant is seeking a supplemental attempt.
4. **Contents of Proposal:** A suitable upgrading proposal must demonstrate how the proposed mentoring/tutoring or upgrading courses correlate to the examination areas where the candidate was previously unsuccessful or where they performed poorly. The proposal should be sufficiently detailed so that the Registration Committee can determine whether the upgrading will satisfactorily address the individual's areas of weakness.
5. **Student Registration:** If the upgrading proposal is acceptable to the Committee, the applicant may be provided with the option of registering with COO for a certificate of registration as a student **optician**. The Committee will require the applicant to complete the approved upgrading plan within a specified timeframe.

### **Completion of Upgrading**

The applicant is responsible for submitting acceptable evidence of completion of the upgrading plan for the Registration Committee's consideration.

Satisfactory completion of the approved upgrading plan will result in eligibility for one supplemental examination attempt, only. For the purposes of writing the examination, the Registration Committee may issue the applicant a certificate of registration as an intern for a period specified by the Registration Committee. If the applicant opted to register as a student **optician** while completing the upgrading proposal, their registration status will automatically be transferred to a **registered intern optician** status **upon successful completion of the upgrading proposal.** ~~by COO.~~

## ADMINISTRATIVE POLICY

### Retention of Legal and Verifying Documents Policy

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The College of Opticians of Ontario (COO) may periodically request applicants or registrants to submit legal or verifying documents. These requests may be made at the time of application for registration or reinstatement of a certificate of registration, registration renewal, or between renewal periods if there is a change in status or other circumstances that require the submission of such documents (e.g. if a member changes his or her legal name in the middle of the year, he or she will be required to submit proof of the name change).

The following are examples of some of the legal and or verifying documents you applicants or registrants may be requested required to submit to the College:

#### Legal Documents:

1. Documentation to verify your legal name, such as ~~(e.g. A notarized photocopy photocopies of your current passport, or driver's license, or birth certificate (accompanied by a valid government-issued photo ID second piece of identification with your legal name e.g. health card).~~
1. Documentation to verify your Canadian citizenship or immigration status: ~~(e.g. If you are a Canadian citizen, a notarized photocopy of your Acceptable documents include notarized photocopies of current Canadian passport, or Canadian citizenship card or birth certificate, Canadian citizenship card, or Canadian citizenship certificate. If you are not a Canadian citizen, Non-Canadian citizens may submit a notarized photocopy of your their permanent resident card, or valid work permit or study permit student visa)~~

#### Verifying Documents:

1. Letter of good standing from all the regulatory authorities you are the applicant or registrant is registered with.
2. Documentation to verify English or French language proficiency, such as academic transcript(s) or standardized test report(s) ~~(e.g. Transcript of test result).~~
3. Documentation to verify your education in opticianry or related field, such as academic transcript(s) and ~~(e.g. A photocopy of your eyeglass certificate, contact lens certificate, diploma/degree from your an educational institution).~~
4. Documentation to verify qualifying examinations you have completed in opticianry or related field.
5. Assessment Evaluation report of your academic credentials from World Education Services (WES)
6. Criminal record check reports

#### When submission of original documents is originals are required

~~The College will not request the original of any legal or verifying document other than as noted in this~~

~~policy or in other circumstances where it is necessary to do so. The College must receive originals of the following documents when requested and will not accept photocopies, whether they are notarized or not.~~

For verification purposes, COO may require applicants to submit original documents, including legal documents, academic transcripts, and diplomas/degrees. Other than the documents referred to below, all other original documents will be returned to the applicant or registrant once they have been verified.

~~These documents will be retained indefinitely in your membership file if you are a member or become a member of the College:~~

The following original documents will be retained on file indefinitely:

1. Letters of standing from regulatory authorities
2. Standardized test reports
3. Academic Transcripts received directly from educational institutions
- ~~4. Letters of good standing from other regulatory authorities~~
5. Assessment Evaluation reports of academic credentials from World Education Service (WES)
6. Criminal record check reports

~~Should the College receive the original of any legal or verifying document from you, we will make a photocopy of the document and make reasonable efforts to arrange for you to pick up the document in person (with the exception of transcripts, letters of good standing and assessment reports of our members as noted above and any other document which is retained indefinitely). If we are unable to make arrangements with you to pick up the document, it will be returned<sup>1</sup> to you as soon as possible but no later than one year from the date of receipt. If we are unable to reroute the documents after two attempts they will be destroyed by the College (with the exception of original documents). The College will not destroy the original of any legal or verifying document we receive.~~

~~If your application for registration is not approved or should you decide to withdraw your application for registration, you may pick up any legal or verifying document you submitted to us or we will return<sup>1</sup> the document to you within 60 days.~~

#### **Inactive Applications for Registration**

~~If your application file is inactive for a period of one year, it will be closed and all documents (i.e. legal, verifying or otherwise) that we have received from you will be returned<sup>1</sup>. If these documents are undeliverable or returned by mail or courier to the College, we will make reasonable efforts to contact you to reroute them.~~

#### **Inactive, Refused, and Withdrawn Applications**

If an application for a certificate of registration remains inactive for a period of one year, the application file will be closed and the legal and verifying documents will be returned to the applicant within 60 days.

If an applicant is refused registration with COO or decides to withdraw their application, the legal and verifying documents will be returned to the applicant within 60 days.

<sup>1</sup> Any legal or verifying document returned by the College will be sent to your last address on file by registered mail or courier (signature required)