

# Fair Registration Practices Report

## Opticians (2010)

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 Act (FARPA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPA
- 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 registration processes for internationally educated applicants, out of province applicants and Ontario based applicants is readily available on the College of Opticians website at [www.coptont.org](http://www.coptont.org). Regulations, by-laws, policies that govern the registration process, as well as Registration flow-chart are posted on the website, including some of the application forms. The College will be posting all of its application forms for all classes and categories of registration on the website in the near future. The website is checked regularly for the accuracy of the content. Every effort is made to explain the processes in plain language, so that the information is user friendly.

The College also sends information / application packages out to applicants who e-mail / fax or mail their inquiries. For internationally educated applicants there is a staff member assigned to deal with initial inquiries and she provides information promptly. Most inquiries come to us 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 - all potential applicants can pick up an information / application package right there and ask questions of the College representatives. We also encourage applicants to attend at our office in person (for appointments or as walk-ins) - a staff member would meet with them and provide any information / applications they might need.

The College reviews the initial registration packages and the information posted on a regular basis. The information is revised regularly for accuracy and ease of use. In some instances, the College automatically sends the registration packages / information to applicants when they become eligible for another class of registration or become eligible to take the registration exams.

As of 2010, the College provides another set of information sessions offered to students in the final stages of the program - graduating from NACOR accredited and Ministry approved Opticianry programs. The sessions are intended to clarify the exam application process, as well as the application process for applying for a certificate of registration as an Optician once the students successfully pass registration examinations.

## b) requirements for registration

The requirements for registration for all classes (Opticians, Student Opticians, Intern Opticians) and sources of applicants (Internationally educated, out of province, Ontario based) are posted on the 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 mailed to the potential applicant. The package usually contains a cover letter, info sheet(s) and application forms outlining the requirements for registration in more detail. Staff members are always available to answer questions or provide any further information by e-mail, phone or mail. The registration staff are available for appointments or walk-ins and will provide the information about registration practices on the spot.

The information sessions for new students at the two Ontario-based teaching institutions that provide NACOR accredited and Ministry approved Opticianry programs include presentations and Q&A with the College representatives - general information about the registration practices and an overview is provided this way.

The registration application packages are regularly reviewed for accuracy and ease of use. Should any policy or registration practice change, the information is 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

Some of this information is posted on the website. This is an area the College will be working on to improve in the near future. The website content will be re-vamped to include more details for all classes of registration from all sources.

An application package also contains this information. The requirements are clearly outlined, such as the requirement to have both the eyeglasses dispensing and the contact lens dispensing education / training in order to obtain registration as an Optician. Registration staff also provide information and explanation on how the requirements for registration are to be met via telephone, e-mail or mail, or in-person upon request.

As an example, for internationally educated applicants, a certain number of dispensing hours and fittings (work experience) is required - we accept the applicant's statutory declaration regarding practical experience as proof of the stated number of hours and fittings - this requirement and the way to satisfy it is outlined in the application package. The explanation about the process for credential assessment done by WES, what kind of an assessment the applicant will go through, the required level of language proficiency, as well as the fees that apply for internationally educated applicants, are posted on the website and outlined in the application package.

Another example - for new students, the College prepares application packages that include an information sheet, an application, as well as copies of the Opticianry Act, the College Regulations and By-laws (a number of requirements and fees are outlined here). These packages are distributed to all potential student optician applicants at the information session.

## 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 specific requirements for all applicants to complete their education / practical

experience in Ontario. This requirement is only in place for Ontario based applicants who follow the "local" path to registration as Opticians. Student Opticians satisfy this requirement as part of their curriculum at the approved Ontario opticianry program. The College requires this type of applicants to submit verification of completed 1,000 hours of supervised dispensing experience - this requirement is communicated to them at information sessions (when they register as new students), on the website, and in the cover letter sent to them once their status is upgraded to Intern Opticians upon successful graduation from the program.

Applicants that come to the College from other provinces via the Mutual Recognition Agreement are already fully licensed opticians in other provinces, therefore this requirement does not apply to them.

Internationally Educated Applicants must provide a statutory declaration verifying the approximate number of eyeglasses and contact lens fittings and the approximate number of hours of verified dispensing experience they have completed while practising in their home country. Again, we accept the applicant's statutory declaration.

#### e) requirements that may be satisfied through acceptable alternatives

This issue may be relevant for internationally educated applicants (IEA) who, for various reasons, are unable to provide their documents. The College has developed a flow-chart, linked on the web page that outlines the requirements for registration for IEA, that explains which requirements may be satisfied through alternative ways and what these ways exactly are (a statutory declaration). We will be moving the contents of the flow-chart directly to the webpage, so the applicants can have easier access to the information. Basically, all requirements that are to be satisfied by presenting relevant documentation, may be satisfied by way of a statutory declaration, if the applicant is unable to obtain the documentation (due to extraordinary circumstances). The applicant may also provide a detailed letter of explanation of his / her individual circumstances, letters from supervisors, employers, etc. The applicant will go through a prior learning assessment and recognition process to demonstrate his / her level of knowledge and skills in opticianry. Otherwise, the information on acceptable alternatives is available upon request via phone, fax, e-mail or regular mail. This also includes appointments or walk-ins.

As for Ontario based this issue has never arisen. The College would work with the applicant (obtaining a confirmation letter, etc. from the teaching institution) should this happen.

A good example of the College's flexibility in this area is our recent experience with applicants from a non-accredited out-of-province school. The applicants were not able to provide a detailed course outline, which is normally necessary for the document assessment, therefore, the Registration Committee decided to accept an individual "Student Record" instead. The "Student Record" document is available and provides some information to assist the Committee.

#### f) the steps in the assessment process

\*\*\* SAME AS LAST YEAR \*\*\*

The assessment process is explained in detail in the application package. The process is also outlined on the website, perhaps in less detail due to space constraints. The Registration staff are available to answer any questions by phone, email or in person.

#### g) the documentation of qualifications that must accompany each application; indicate which

## documents, if any, are required only from internationally trained applicants

The information on what documentation of qualifications is needed is available on the 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 (appointments and walk-ins). Internationally Educated applicants and applicants from non-accredited schools are requested to submit : any diploma(s), certificate(s), the course outlines, official transcripts, school information. Internationally Educated Applicants are also required to submit; WES course-by-course evaluation, language proficiency test results (if education not completed in English / French). Again, if obtaining these documents for Internationally Educated Applicants would cause undue hardship to the applicant, there are alternative ways of proving the applicant's credentials (statutory declaration).

For recent applicants from a non-accredited school, the Registration Committee accepted a copy of the applicant's Student Record instead of an official course outline, which the applicants had problems obtaining. This now applies to all future applicants from that school and is communicated to applicants in the cover letter of their application package. The Registration Committee is still able to get sufficient information from this document to complete the document assessment process.

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

There is a link to the flow-chart on the web-page outlining the process and requirements for internationally educated applicants. This flow-chart provides details on acceptable alternatives to the documentation if the applicant cannot obtain the required documentation for reasons beyond his / her control. We accept a statutory declaration from the applicant in lieu of the missing documentation. The applicant could also submit a detailed letter explaining his / her circumstances, letters from employers, etc in addition to the statutory declaration. We will be moving the contents of the flow-chart directly to the web-page itself to provide easier access to this information in the very near future. The application packages will be updated to include this information as well.

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

The Registration Committee reviews all registration flow-chart on a yearly basis to ensure accuracy and currency of the information.

For recent applicants from a non-accredited school, the Registration Committee, after realizing that applicants had problems obtaining an official course outline from the school, decided to accept a copy of the applicant's Student Record instead. This is now communicated to all future applicants who graduated from the same school, via the cover letter in the application package.

## i) how applicants can contact your organization

The website lists contact information for the College, including all staff - their name, title (for example, Co-ordinator of Registration), e-mail address and phone extension. This information is regularly reviewed and updated. Applicants are welcome to contact the College by e-mail, mail, fax, telephone, in person (appointments and walk-ins). Applicants can meet with the Co-ordinator of Registration or Director of Professional Programs. The website information of each particular section also lists the contact name for that particular area (for example, the section about Prior Learning Assessment and Recognition process) lists the name and contact information of the staff person in charge of the initial intake.

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

The College always requests the contact information for an applicant, including their address, e-mail address and phone number. If the application is not complete, the registration staff contact the applicant to request the missing information.

An internationally educated applicant is contacted several weeks before his / her file is presented to the Registration Committee to update him / her - the assessment fees are due at this point as well. Shortly after the meeting takes place, the applicant will be contacted via e-mail or phone to provide an update on the decision of the Registration Committee, usually within 5 business days. A formal letter will follow shortly thereafter. We find the applicants really appreciate an update in this short time-frame.

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

The College requires documents be translated into English / French. This information is provided in the initial application package and by phone, e-mail, mail or in-person. The College, however, endeavors to be flexible and reasonable, we might 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

This information is posted on the website and contact information is provided for all third-party organizations that applicants may come in contact with. The application packages also contain the same information and it is provided by staff via phone / e-mail / mail or in person.

For Internationally Educated Applicants, the College requires a course-by-course evaluation by WES and the applicants are advised accordingly on the College website and in the application package. The applicants contact WES directly and bear the costs of the evaluation.

The applicants who were not educated in English / French must also provide evidence of the level of language proficiency - there is a number of language proficiency tests we accept (according to the policy that is made available to the applicants early on in the process through the website, application package and the information provided by staff).

All applicants (including Ontario-based applicants) except than licensed Opticians from other provinces who come to us under the Mutual Recognition Agreement, must pass the National Eyeglasses and the National Contact Lenses Exam. The exams are administered by NACOR (National Association of Canadian Optician Regulators) - the exams administration is facilitated by the College of Opticians. This information, as well as the contact information for NACOR, is posted on the website, included in the application packages and provided by staff.

Bridging programs are individually tailored on as-needed basis by teaching institutions based upon the direction of the Registration Committee of the College. The contents / length of the program depends on the applicant's individual upgrading needs as determined by the Registration Committee after an assessment. The College works closely with the teaching institutions in developing an appropriate upgrading / bridging program

for each applicant. Applicants are advised of the possibility of having to complete an upgrading as part of the process, this information is posted on the website, included in written communication, via e-mail / phone or in person.

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

The College will be developing a formal policy regarding timelines around the registration processes in the very near future, which will then be posted and published. Currently, the applicants are advised of the anticipated registration timelines via phone / e-mail or when they visit our office in person.

For Internationally Educated applicants, once the file is complete, it is presented to the Registration Committee. However, we don't wait until the next available Committee in-person meeting. Our recent practices have been to deal with these matters via electronic meetings / e-mail. As a result, the Committee reviews the file and makes a decision in a more timely manner. The applicants are advised of this new process very early on via phone / e-mail / in-person.

Once the Committee's decision has been made, the applicant is given an update (via phone / e-mail), usually within 5 business days. A formal letter will follow shortly thereafter. The applicants are notified about these timelines during a phone call / e-mail prior to their file being reviewed by the Committee.

If an internationally educated applicant's file has been inactive for one year - no contact, no new documents submitted, etc. - the file will be closed, but could be re-activated at a later date. This information is included in the cover letter of the application package and is also communicated over the phone / e-mail / in-person.

For Ontario-based / MRA applicants the application processing times are indicated in written communication that accompanies all application / registration form. The time indicated is currently 6-8 weeks, however, in most cases applications are processed a lot faster. The College will be moving to shorten these timelines in the very near future, since, in fact the processing very rarely takes the stated amount of time.

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

The Internationally Educated Applicants are usually given an estimated amount of time the registration process takes over the phone / e-mail / in-person. The College will be developing some policies around this in the very near future.

In reality, the amount of time the registration process usually takes depends, to a great extent, on the time the applicant needs to gather and submit his / her documents. Once all the documents (or a detailed letter of explanation + statutory declaration, etc) have been submitted, the file is presented to the Registration Committee. The Committee has recently implemented electronic / e-mail meetings to deal with applications in a more timely manner. The Committee may request more information or direct the applicant to undergo a prior learning assessment and recognition process. This process consists of an on-line competency gap analysis, a practical assessment of the applicant's contact lens insertion and removal skills and an in-person interview. The recommendations of the interview panel and all other results are forwarded to the Registration Committee usually within 2-3 weeks. If the applicant is successful, he / she can usually get registered as an Intern Optician within 4 - 6 weeks following the Registration Committee decision. If the applicant gets directed to complete bridging program(s), the same time-line for advising him / her applies.

For Ontario-based / MRA applicants, once we receive their application and documents, the communicated processing times are 6-8 weeks - applicants are advised of this in their application package. As mentioned above, in most cases, applications are processed quite a bit sooner. The College will be developing a more formal policy around this and will explore shortening the processing times, as in reality, the processing times

are shorter in most cases.

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. The By-Law is posted on the website and the link information is provided to all potential student applicants as well as all members. 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.

The Internationally Educated Applicants are informed of all all potential fees associated with assessment and registration on the web-page in an easy-to-read table format. This has worked well and the College will be developing the fee charts for all classes and categories of applicants - this information will be posted on the website in the very near future.

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

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

If a special accommodation is requested with respect to registration exams, more time allowed per exam section, or frequent breaks in between the exam sections may be approved. All exam candidates (intern opticians challenging the National Exams) receive a copy of the NACOR Candidate's Examination Handbook along with their exam application. The Handbook is available on the NACOR website as well.

The Handbook clearly outlines the process for applying for special consideration during exams:

"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.

Even though the decision whether to accommodate such an applicant is made by the NEC of NACOR, the College is consulted and involved in the process. The Handbook is also posted on the NACOR website.

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

An important change that occurred in 2010 was the development and implementation of the national Prior Learning Assessment and Recognition (PLAR) process. This process applies to Internationally Educated Applicants, as well as graduates from the Opticianry programs that have not received the accreditation by NACOR and that have not been approved by the College. The process is exactly the same in every province (except Quebec) and replaces the assessment test that the Registration Committee used to conduct. The new PLAR includes: an on-line competency gap analysis (CGA), a practical assessment of the applicant's contact lens insertion and removal skills, and an in-person interview with a Panel to go over the results of the assessments and, through a discussion with the applicant, ensure that the results of the CGA are accurate. The Panel then issues recommendations to the Registration Committee and the Committee makes a decision.

The outcome could be: direct the Registrar to register the applicant if he/she successfully completes specified bridging program(s), direct the Registrar to register the applicant if he/she successfully completes registration examinations, direct the applicant to enroll in an accredited program or direct the Registrar to issue a license. The decision of the Registration Committee is appealable to the Registration Appeal Panel (internal appeal) and after that to the Health Professions Appeal and Review Board (HPARB).

This important new process has been described in detail on the College's website and the information is included in the application package. All the information is provided by staff - by phone, e-mail, appointments or walk-ins.

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## Amount of Fees (2 / 13)

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

All fee amounts are communicated to internationally educated applicants on the website in the section for IEA. The fees are also indicated in the application package, and are communicated via phone, e-mail, in person appointments and walk-ins.

There is a non-refundable application fee for the evaluation of the applicant's credentials / documents / file by the Registration Committee of \$500.00 (plus HST). However, this fee is only required once the applicant's file is ready for the Committee's review. If the file, for whatever reason, never gets to this point (abandoned, etc.) no fee is charged. This fee does not apply to Ontario-based / MRA candidates, since the Registration Committee would not have to evaluate their credentials. Another fee that affects IEA is \$300.00 (plus HST) which is the fee for taking the on-line gap analysis, practical contact lens skill assessment and the interview with the Panel. These two fees (\$500.00 + \$300.00) also apply for the assessment of applicants who graduated from non-accredited programs.

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 were not 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.

The new PLAR process was developed and implemented, however, the corresponding fees still need to be assessed and confirmed. The currently charged fees for PLAR are the assessment fees traditionally charged for the assessment of internationally educated applicants. The College, working together with BC and Alberta (the two provinces that receive a significant number of applicants from non-accredited schools), will assess the costs of running the new PLAR process and will determine the fee based on cost-recovery basis. We expect this assessment to be completed by mid 2011. The PLAR fees could be slightly higher than \$500.00 + \$300.00 (currently charged), since the new process is a big step forward and, at least in the initial stages, requires more resources.

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

### a) What are your timelines for making registration decisions?

For Internationally Educated Applicants, once their file is complete, it is presented to the Registration Committee. The Committee has continued to assess the documents via electronic / e-mail meetings as soon as possible. This new process has significantly decreased the time needed to reach a Committee decision. Therefore, from the day the file is complete to the day the applicant receives an official decision of the Committee (sometimes this is the first step in the process, if more information is needed or if the applicant has been directed to proceed to prior learning assessment and recognition), it usually takes a few months. There could be delays though on the applicant's part - gathering documents could sometimes take a long time. Once the Committee's decision has been made, the applicant will be notified usually within a few days, by phone / e-mail. An official letter follows soon thereafter.

The timeline for processing of the Ontario-based / MRA applications is communicated to the applicants as being 6-8 weeks. We advise applicants of the maximum amount of time it may take, however, in most cases, the applications are processed in less time. The 6-8 week processing time occurs in case the applications are received in "bulk" - for example, after an exam session. It is quite possible that the College receives 90-100 applications virtually at the same time in which case, it will take 6-8 weeks for the applications to be processed. Otherwise, the length of processing time is shorter and could be as short as 3 weeks.

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

\*\*\* SAME AS LAST YEAR \*\*\*

Although, the timelines for responding to applicants in writing are not set in a formal policy (the College will be working on developing this policy in the near future), the timelines are generally very short (approximately one week). The only exception would be a very complex case that may require legal advice or consulting an external person. E-mail is used more and more as means of communication with applicants and they seem to prefer it. Mail service can be lengthy especially if the applicant is still in his / her home country.

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

For Internationally Educated Applicants, after the Committee has made a decision, the applicant is advised by phone or e-mail within a few days. The formal written notification of the decision usually follows within 5-10 days. This notice includes the information on how to appeal from the decision and to whom. If the applicant wishes to appeal, he/she is invited to submit additional documents or provide additional information, and the Registration Appeal Panel will consider the matter.

Ontario-based applicants / MRA applicants are advised of their registration and the registration number by phone 1-5 days after the Registrar / Deputy Registrar has signed off on their application (which means that they have been registered with the College). An official registration package follows shortly thereafter in the mail, but members can start working as of the date of registration.

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

After every Committee meeting (in person or electronic / e-mail), there is a "to do" list for the Registration staff. Normally, letting applicants know about registration decisions takes priority. The applicants are regularly advised prior to the meeting that they could inquire the following day after the meeting to learn about the decision. The official letter follows, usually within about 5 days.

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

In 2010, an internal appeal mechanism has been added to the College's registration process. Any applicant has the right to appeal from the decision of the Registration Committee to the internal Registration Appeal Panel (RAP), within 15 days of the receipt of the Registration Committee decision. The RAP consists of 3 members (2 Opticians and 1 Public member) and they are different people than the ones who sat on the Registration Committee Panel. Even though, as far as timeliness, another layer has been added (additional time for the RAP to receive and consider a matter), we feel this is a big improvement in adding transparency and fairness to registration decisions.

The applicant has the right to appeal from the decision of the RAP to HPARB within 30 days of the receipt of the RAP decision (this is a statutory deadline).

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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.

\*\*\* SAME AS LAST YEAR \*\*\*

Applicants have full access to their records upon a 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.

The College receives this type of requests extremely rarely.

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

\*\*\* SAME AS LAST YEAR \*\*\*

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 refuse to provide access to this type of information in the applicant's file.

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.

The application packages for all classes of registration contain a detailed guide outlining the process and required documents. All applicants / members are provided with link to the Opticianry Act, Regulations, By-Laws and Standards of Practice - as a part of the package provided to teaching institutions for "new student" orientation. All Student Opticians who have graduated from their program automatically receive information about the National Exams, including the NACOR Candidate's Examination Handbook with no cost to the Student.

The College website offers a lot of information for all classes or registration ("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

Entry-to-Practice Competencies, Registration Regulation, By-Laws, all registration policies, etc) are all posted on the website.

Applicants also receive information by email, phone or in person.

The College offers orientation sessions to new students in the Ontario based NACOR accredited and Ministry approved Opticianry programs. The College also provides in-person exam orientation sessions to potential new graduates of these programs who may be eligible to sit the registration examinations.

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.

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 (appointments or walk-ins).

The orientation sessions for new students and potential exam candidates are also a very good resource tool for these applicants.

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

In 2010, in addition to the regular orientation sessions for the newly enrolled students in the Ontario-based NACOR accredited and Ministry approved Opticianry programs, the College started offering exam orientation sessions to the soon-to-be graduates of these programs / potential registration exam candidates. The two sessions held in 2010 received very good feedback from the students, as well as the program coordinators.

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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.

In 2010, the College implemented some significant changes to the internal review / appeal process from the Registration Committee decisions.

A 3-member Registration Appeal Panel (RAP) is constituted at the beginning of each year at the same time

when the Registration Committee gets formed. The RAP consists of 2 Optician members and 1 Public members and these are different people from the people on the Registration Committee. The RAP will receive a detailed orientation, presented by Mr. Richard Steinecke, legal counsel, at the beginning of each year. They will only meet as necessary, if an appeal has been filed. The review is paper-based, and the applicant is invited to submit any additional materials / documents he would wish the RAP to consider. The applicant has 15 days from the receipt of the original decision from the Registration Committee to file the internal appeal. The decisions of the RAP are appealable to HPARB within 30 days of the receipt of the decision.

Since the RAP meets only if and when there is an appeal (we have not had any appeals to RAP in 2010), they would meet as soon as we could get all 3 members together, which should not take longer than 2-3 weeks after the appeal has been received. The RAP would make a decision at the meeting and finalizing a written Decision and Reasons and issuing it to the applicant should not take more than 2-3 weeks after the RAP meeting.

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

None. There were no internal reviews / appeals from the decisions of the Registration Committee in 2010.

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

None. There were no internal reviews / appeals of registration decision in 2010.

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

The applicant can provide additional materials / documents at any time, but is formally invited to submit any additional materials if they choose to file an internal appeal 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.

The internal appeal is paper-based.

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.

The submissions from applicants are requested to be in writing, in an e-mail / fax / letter format. The applicants are informed in the cover letter that accompanies the initial decision and reasons of the Registration Committee. The review is paper-based, so 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.

A 3-member Registration Appeal Panel is totally separate from the Registration Committee - it consists of 3 different people who cannot be members of the Registration Committee at the same time. The RAP consists of 2 Optician members and 1 Public member and will only meet if there is an internal appeal filed. Therefore, it is clear that the members of the RAP cannot be involved in any prior decision making.

The members of the RAP receive a detailed orientation at the beginning of the year which includes all registration requirements and processes, as well as their specific 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 from 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 submission and submit any additional documents he/she may have. The RAP meeting would be scheduled soon thereafter. The review is paper-based and the RAP issues a written decision and reasons to the applicant. The applicant may appeal from the 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 2010 Registration Committee of the College of Opticians had 5 members. This Committee made initial registration decisions.

3 members were members of the profession (registered Opticians in Ontario) and 2 members were public members appointed to the College Council by the government of Ontario.

The 2010 Registration Committee did not have any Committee members that were internationally trained professionals.

The 2010 Registration Appeal Panel (RAP) had 3 members: 2 Optician members and 1 Public member. None of these members were internationally trained members of the profession in Ontario. The RAP would make decisions on the internal appeals, however, there were no appeals to RAP in 2010.

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

This area of registration was significantly changed and improved in 2010 as per the above. We feel that these changes have contributed to the College of Opticians registration processes being more transparent, fair, impartial and objective.

## 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.

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

The information provided includes the name of the 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 initial information about the PLAR process page.

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

The change in the internal appeal structure affected this area of registration processes as well. The letters / information available to applicants were updated to include the new internal appeal option.

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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.

Ontario-based Applicants - must have graduated from an Opticianry program accredited by the NACOR (approved by the MTCU or a program deemed equivalent by the Registration Committee), must have successfully completed the National Eyeglasses and the National Contact Lenses exam and have completed at least 1,000 hours of verified dispensing experience. The program coordinators provide lists of students that have met all the requirements for graduation to the College directly, which makes Student Opticians eligible to be upgraded to Intern Opticians and to take the registration exams. Intern Opticians apply directly to NACOR to sit the registration exams, however, the College of Opticians determines the eligibility of potential exam candidates. Upon successful completion of the exams, Intern Opticians apply to the College for a Registered Optician license, complete the application form, submit 2 photos, and pay the application + registration fee. By this point, the applicants have already submitted a completed Verification of Dispensing Experience form, confirming that they have completed at least 1,000 hours of verified dispensing experience under the supervision of an Optician, Optometrist or a Physician. Applicants must also provide a statutory

declaration that they possess liability insurance coverage in the minimum specified amount in order to be registered as Opticians.

MRA applicants (both licenses) - must hold a current Eyeglasses license as well as a Contact Lens license in good standing from another province. 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 2 photos, pay the fee and provide a statutory declaration that they possess liability insurance coverage in order to be registered as Opticians.

MRA applicants (Eyeglasses only license) - must hold a current Eyeglasses license in good standing from another province. These Applicant may apply for a Student Optician license while in the process of completing a Contact Lens upgrading program. Some provinces have a dual licensing system which separates the two licenses (Eyeglasses dispensing and Contact Lens dispensing). Ontario and Quebec have a combined licensing system. Opticians licensed in Ontario hold one license, that includes both Eyeglasses and Contact Lens dispensing. Therefore, under the MRA, signed and accepted in all provinces (except for Quebec), Eyeglasses-only opticians from other provinces may apply for a Student Optician license in Ontario and complete a contact lens upgrading program. For such registration, we require a letter of good standing from their home province be sent directly to the College, a completed application form, 2 photos, and payment of the application + registration fee.

Internationally Educated Applicants - must provide completed application forms, 2 photos, a course-by-course evaluation from WES, transcripts, any diploma(s) or certificate(s) they were granted, 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 from the regulatory body), statement of professional experience and proof of language proficiency as per the College's Language Proficiency Policy. Once approved by the Registration Committee (may include a prior learning assessment and recognition process), such applicants become eligible to apply either for an Intern Optician license (then must successfully pass the National EG and the National CL exam) or for a Student Optician license (if directed to take any bridging programs or enroll in an accredited Opticianry program). At this point, once they successfully pass both registration exam, the applicant sbecomes eligible to apply for an Optician license following the same process as described above.

Student Opticians must be continually enrolled in an approved Opticianry program to maintain their license. New students must submit a completed application form, 2 photos and the payment of the application + registration fee. Their registration is contingent upon the confirmation of their status received directly from their teaching institution (for the approved programs).

Graduates of non-accredited Canadian-based Opticianry programs - in 2010 the College saw an increase in this type of applications, since as of 2010, graduates of a Canadian-based non-accredited program are no longer eligible to directly apply for registration as Opticians in another province after passing the National exam, as was the case previously. These applicants can now apply directly in Ontario as applicants who graduated from a non-accredited program and have to be assessed by the Registration Committee. The applicants must submit all documents that are requested of internationally educated applicants, except for the WES assessment and the proof of language proficiency. These applicants have to go through a prior learning assessment and recognition process, which has been developed and implemented nationally to ensure consistency of assessments throughout Canada. The PLAR process consists of: assessment of documents, on-line competency gap analysis, a practical assessment of the applicant's contact lens insertion and removal skills and an in-person interview with a Panel. The Panel makes recommendations to the Registration Committee, that then makes a decision and issues a decision and reasons to the applicant. The applicant may be: directed to take bridging program(s) (in which case, he/she is eligible to apply for a Student Optician license), take the registration exams (in which case, he/she is eligible to apply for an Intern Optician license), register as an Optician (very rare cases), or enroll in an accredited program (eligible for a Student Optician license).

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

The 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. The Committee assesses each individual applicant separately. Therefore, Opticianry programs completed outside of Canada are assessed on an individual 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 College of Opticians' Entry-to-practice competencies for each individual applicant.

If the program and credentials are deemed to have partially met the College of Opticians' Entry-to-practice competencies, the applicant is required to undergo a prior learning assessment and recognition process which provides for 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 may be directed to complete bridging program(s), sit the registration exams, apply for an Optician license or enroll in an accredited program.

If the program and credentials are deemed to have met the College of Opticians' Entry-to-practice competencies for the most part, the applicant may be directed to apply for an Intern Optician license and challenge the National Exams directly. The process continues thereafter, as described above.

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

Internationally Educated Applicants - the applicant must give a statutory declaration confirming the approximate number of hours of dispensing experience in their home country, as well as the approximate number of fittings he / she has completed. The requirement is a minimum of 1,000 hours of verified dispensing experience. If the applicant is able to provide other documents to corroborate this statement, he /she is encouraged to submit them, however this is not mandatory. Also, if the applicant is requested to undergo a prior learning assessment and recognition process, the Committee can satisfy itself that the applicant possesses the skills and knowledge of opticianry acquired through work experience comparable to the applicants educated in Ontario.

All other applicants for an Optician license (except for the MRA Opticians in good standing holding both the eyeglasses and the contact lens license from another province who do not have to satisfy this requirement) must demonstrate that they have completed a minimum of 1,000 hours of verified dispensing experience. This is a declaration signed by the applicant and his/her supervising Optician, Optometrist or a Physician confirming that the specified number of hours of dispensing experience has been completed.

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.

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 College of Opticians' 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 very respectable 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. The College's Director of Professional Programs acts as a support staff person for the Registration Committee. She 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 of this kind. This could include meeting in person with the applicant, interviewing the applicant (by the Registration Department staff), the applicant bringing a support person (i.e. a family member / interpreter), assistance with completing forms, etc.

Requests of this kind (special considerations) are rare in the registration area, they occur more often in the area of exams.

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 applicants originating from different sources. Sometime, it is out of the College's control - how long the process takes depends directly on the point in time the applicant submits the required documentation or payment.

However, typically:

Ontario-based - Student Opticians - application to registration - 3-8 weeks. Intern Opticians (there is no formal application process, student opticians are upgraded in the system once they graduate - 3-6 weeks. New opticians - once an Intern Optician passes the National Examinations - 3-8 weeks. However, if an intern Optician fails the Exams, it could take up to 3 years before he / she is eligible to apply as an Optician which is once they successfully pass the exams.

Other provinces - Student Opticians and new (MRA) Optician applicants - 3-8 weeks processing time from the date of initial application.

Internationally Educated Applicants - varies greatly, depends on the point of time the file is complete to be reviewed by the Registration Committee. Anywhere from 3 months to 1 year from the time of initial application. Once the file is complete, it typically takes 11-17 weeks. If there are requests for additional documents or clarification, it may take up to 52 weeks. If the applicant has been referred to bridging programs and registers as a Student Optician, the length of time is directly dependant on the time the applicant takes to complete all specified bridging programs.

Graduates of Canadian-based non-accredited programs - similar process as for IEA, as these applicants go through the prior learning assessment and recognition process. However, these applicant normally have no problems gathering the necessary documentation. The whole process for them to get directed either to complete bridging programs, register as Intern Opticians and take the registration exams or enroll in an accredited program may take 3-6 months.

Although in our communication with the applicants we indicate 6-8 weeks as average application processing time, this has been done in order to manage expectations. In reality, the application processing time takes 3-4 weeks in most cases. It is important to note that for Ontario and Out-of-Province applicants, the 6-8 weeks processing time happens when the 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. The College wishes to have the applicants forewarned that they may have to wait up until 8 weeks if there are many applications received at the same time.

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

\*\*\* SAME AS LAST YEAR \*\*\*

Please see above - (h) for the answer.

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) for the answer. The process for assessing and evaluating internationally educated applicants is quite different from the process used for the Ontario-based or the MRA applicants and depends greatly on whether the required documents have been submitted.

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 Committee assesses whether the program the applicant has completed meets the College's Entry-to-practice competencies and whether it is comparable to a similar Ontario-based program. If the program partially meets the competencies, the applicant may demonstrate his level of knowledge and skills through completing the prior learning assessment and recognition process which will identify if there are any gaps in his/her competency.

iii. Explain how work experience is taken into account.

The prior learning assessment and recognition process has a practical component, and by completing it the applicant has a chance to demonstrate his / her knowledge, skills and experience in opticianry. Also, the applicant's statutory 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.

The program contents (course outline), length of the program, number of teaching / practical hours, etc. are compared to the College's Entry-to-practice competencies to determine if the competency requirements have mostly been met. This way, the program is evaluated as to whether it is comparable to an approved Ontario program (which teaches to the College Entry-to-practice competencies).

If the program meets the competency only partially, the Committee normally directs the applicant to undergo a 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 comprehensive on-line competency gap analysis, 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.

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

The Entry-to-practice competencies document has scheduled review dates.

The prior learning assessment and review process has been developed and implemented nationally. The bank of questions for the on-line competency gap analysis has been reviewed and revised regularly by expert panels from BC, Ontario and Alberta, which are the provinces that receive the most applicants. All the participating provinces (all provinces except for Quebec) have received a two-day comprehensive orientation and training session.

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

The Registration Committee evaluates the program the applicant has completed against the College's Entry-to-practice competencies when assessing the applicant's 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.

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 has implemented the new national Prior Learning Assessment and Recognition process. This process is now the same across Canada (except for Quebec) and is the same regardless of what province the applicant applies in.

Applicants for registration who have graduated from an accredited Opticianry program recognized by the COO will be accepted for registration provided that they meet the general registration requirements. Applicants educated in Canada and internationally educated applicants; who have not graduated from an accredited and recognized program or are not registered in good standing with another Canadian opticianry regulator may be accepted for registration if they have a combination of knowledge, skills, experience and abilities which are, in the opinion of the COO's Registration Committee, substantially equivalent to the ones required for new applicants under the COO Regulation. After they have completed a Prior Learning Assessment and Recognition (PLAR), these applicants may be directed to complete further examinations, testing, education, training, experience and other upgrading and/or assessments as determined by the Registration Committee.

PLAR is a process that allows applicants who have not completed their education through an accredited Opticianry program to be assessed. These applicants will be asked to demonstrate their level of knowledge and skills of Opticianry. The PLAR process potentially leads to obtaining recognition for prior learning these applicants have acquired.

The applicant submits an application package for PLAR, along with all relevant documents. PLAR consists of the following steps:

- Application
- Preliminary Assessment of Application by Registration Committee (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 (for Internationally Educated Applicants), proof of language proficiency (for Internationally Educated Applicants), resume of work experience, letters of personal reference and professional competence etc).
- Assessment (on-line competency gap analysis, practical assessment in contact lens insertion and removal and an in-person interview with the Panel)
- Registration Committee Assesses Information
- Bridging / Upgrading (if gaps identified)
- National Eyeglasses Exam and National Contact Lens Exam
- Registration as an Optician

The possible outcomes and decisions of the Registration Committee may be:

- direction to complete bridging programs (eligible for the Student Optician license)
- direction to sit the Registration Exams (eligible for Intern Optician license)
- direction to enrol in an accredited program (eligible for Student Optician license)
- issue the Optician license
- refuse to issue any license

All decision of the Registration Committee are appealable first to the Registration Appeal Panel (internal appeal) and then to HPARB.

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

The PLAR process was developed and implemented nationally.

The on-line competency gap analysis bank of questions was developed by a team of experts and has been reviewed by expert Panels from BC, Alberta and Ontario twice already in 2010 for revisions and updating.

Representatives from all provinces had a two day orientation and training meeting in December 2010 - one day was devoted exclusively to Panel training on how to conduct interviews.

The idea is, once we have more assessments done and once we are able to identify trends and weaknesses, to have everything reviewed at least annually.

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 done, as well as the approximate number of eyeglasses and contact lens fittings. This statement is considered when the Registration Committee assesses the applicant.

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 5 sections with 135 enabling objectives. One of the sections is knowledge-based and four are skill-based with clinical judgment-based sub-sets. Within the 5 sections there is the possibility of achieving 236 marks. The passing mark is 145 marks or 61%. If a candidate fails the examinations they must repeat the entire examination.

The National CL exam measures 30 areas of competence broken down into 5 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 5 sections there is a possibility of achieving 216 marks. The passing mark is 147 marks or 68%. If a candidate fails the examinations they must repeat the entire examination.

A candidate is entitled to challenge a NACOR exam a maximum of 3 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 an Optician license 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 4 times a year during the development phase of the examinations and continues to meet 2 or three times a year to evaluate results and make modifications to content 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.

This area of the College of Opticians registration practices saw the most significant changes in 2010. The development and implementation of the national Prior Learning Assessment and Recognition process, as described above, contributed a great deal to the consistent, transparent, fair and objective assessment of the qualification of applicants who graduated from Canadian non-accredited Opticianry programs and Internationally Educated Applicants. The assessment process is exactly the same in all participating Canadian provinces (except for Quebec). The process has been improved and modernized by using an on-line competency gap analysis, the results of which are then verified by an in-person interview with a Panel. There is still a practical component to this assessment (the contact lens insertion and removal). This process has been a significant departure from the assessment test the Registration Committee used previously. The process is accessible to all applicants, consistent and provides for 2 levels of appeals available to applicants.

The national PLAR (process and material contents) is regularly reviewed and updated by Panels of experts from the 3 biggest provinces (BC, Ontario and Alberta) that receive the most applicants. The process is so new that in some aspects, it is still a work in progress, but we are confident and believe in the process.

## 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

\*\*\* SAME AS LAST YEAR \*\*\*

The College of Opticians ensures that relevant information is posted on the third-party organizations' website.

We also provide information / links on our website. More information is provided in the information / application packages about these organizations and their role in the assessment process. For example, the College provides copies of the NACOR Candidate's Examination Handbooks to eligible exam candidates and directs them to the NACOR website where they can download the Handbook.

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

WES has done several presentations to the Registration Committee about methods they use 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 the 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

A good example here would be the College's relationship with NACOR. NACOR's policy, which is communicated to exam candidates well in advance of the exams, outlines the 8-week exam result communication policy. Exam candidates are notified of the exam results within 8 weeks from the date of the

exam. The College receives a master list of exam results for all exam candidates at the same time the exam candidates are notified by NACOR individually. The College monitors if the deadline has been complied with and would react if it had not.

All NACOR policies pertaining to the exam administration (including timelines for responses and decisions and reasons) are set and reviewed by a panel, which includes voting representatives from all participating provinces (including Ontario). Therefore, our representative has first-hand knowledge and input.

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.

For example, 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, 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.

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 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 5 sections with 135 enabling objectives. One of the sections is knowledge-based and four are skill-based with clinical judgment-based sub-sets. Within the 5 sections there is the possibility of achieving 236 marks. The passing mark is 145 marks or 61%. If a candidate fails the examinations they must repeat the entire examination.

The National CL exam measures 30 areas of competence broken down into 5 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 5 sections there is a possibility of achieving 216 marks. The passing mark is 147 marks or 68%. If a candidate fails the examinations they must repeat the entire examination.

A candidate is entitled to challenge a NACOR exam a maximum of 3 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.

The National Examination Committee (NEC) is a working sub-committee of NACOR (the National Association of Canadian Optician Regulators) responsible for the development of examination content and policy. The administration of the examinations is designated to NACOR.

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 met a minimum of 4 times a year during the development phase of the examinations and continues to meet 2 or three times 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 invigilators. 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 4 times a year during the development phase of the examinations and continues to meet 2 or three times a year to evaluate results and make modifications to content 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 Panel that consists of representatives of 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.

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### Training (10 / 13)

a) Describe the training that your organization provides to:

### i. individuals who assess qualifications

The Registration Committee members, as well as the Registration Appeal Panel (RAP) members, attend an Orientation / Training session at the beginning of each year presented by the College's legal counsel. This includes a power-point presentation with handouts, case studies and mock applications. The RAP members receive additional training segment which deals with their specific role and duties.

The Orientation also includes a presentation given by the Director of Professional Programs (the Committee support staff person) which covers the administrative aspects of the College's registration processes.

These orientation sessions are very comprehensive and detailed to ensure that the Registration Committee members have been properly prepared to deal with applications and that the RAP members are prepared to handle any internal appeals.

Other training and ongoing guidance is provided on as needed basis.

All PLAR Interview panel members are members of the Registration Committee, therefore, they receive the same orientation at the beginning of the year.

### ii. individuals who make registration decisions

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 if there was an internal appeal filed from the decision of the Registration Committee. 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.

The main change in this area of the College's registration practices is that the recently formed Registration Appeal Panel (RAP) receives the same orientation as the Registration Committee. In addition, they receive a training segment about their own mandate, role and duty. This will be the case every year.

## 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.

### *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.

\*\*\* SAME AS LAST YEAR \*\*\*

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.

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 the 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 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.

**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	No
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	10.5
Staff involved in appeals process	2
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 applicants<sup>1</sup> 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
U.K.	2
U.S.	1
India	1
Iraq	1
n/a	
n/a	
n/a	
n/a	
n/a	
n/a	

<sup>1</sup>Persons 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 members<sup>2</sup> 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 31<sup>st</sup> 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 31<sup>st</sup> 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
<b>Members on December 31<sup>st</sup> of the reporting year</b>	2075	273	3	33	67	<b>2451</b>

<sup>2</sup> 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:

The College registers 3 classes of registration: Registered Opticians, Registered Intern Opticians and Registered Student Opticians. The above number only includes Registered Opticians, although Student and Intern Opticians are also the College's members. However, according to the Registration Regulation, only Registered Opticians can use the protected title of "Registered Opticians" - RO.

\* There were 389 Registered Students and 117 Registered Interns as of December 31, 2010.

**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 <sup>st</sup> to December 31 <sup>st</sup> 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
<b>New applications received</b>	331	114	1	6	0	<b>452</b>
<b>Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)</b>	0	20	0	0	0	<b>20</b>
<b>Inactive applicants (applicants who had no contact with your organization in the reporting year)</b>	0	1	0	4	0	<b>5</b>
<b>Applicants who met all requirements and were authorized to become members but did not become members</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who became</b>						

<b>FULLY registered members</b>	75	55	0	2	0	<b>132</b>
<b>Applicants who were authorized to receive an alternative class of licence<sup>3</sup> but were not issued a licence</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who were issued an alternative class of licence<sup>3</sup></b>	256	38	1	0	0	<b>295</b>

<sup>3</sup> 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:

The number reported above for applicants issued an alternative class of license in Ontario includes 94 "Intern Opticians" who DID NOT APPLY for this class. Once Student Opticians graduate from their program, they are automatically upgraded to the class of Intern after receiving confirmation from their school. The alternative class "Intern Optician" is issued to these members as it is a prerequisite for sitting the national licensing examination.

	<b>Class of licence</b>	<b>Description</b>
<b>a)</b>	Registered Student Optician	In order to obtain and keep a certificate of registration a Student Optician must be enrolled in a NACOR accredited and an approved opticianry program by the College, or be in the process of completing additional training, as ordered by the Registration Committee of the College of Opticians. A Registered Student Optician may dispense eyeglasses, contact lenses or sub-normal vision devices only under supervision or direction of a registered optician, optometrist or ophthalmologist who is physically present in the place in which the dispensing takes place at the time it takes place.

<p><b>b)</b></p>	<p>Registered Intern Optician</p>	<p>In order to obtain a certificate of registration an Intern Optician must have successfully completed and graduated from a NACOR accredited program and an approved Opticianry program or have completed any additional training as ordered by the Registration Committee of the College of Opticians. Registered Intern Opticians are eligible to sit the National Association of Canadian Optician Regulators (NACOR) Licensing Examination.</p> <p>The Registration Regulation stipulates that Registered Intern Opticians are only allowed a maximum of one renewal. Two additional renewals are at the discretion of the Registrar and may only be granted for the purpose of completion of a supplemental examination if required. Should a candidate not pass a NACOR examination after three attempts, no further challenges will be allowed until the candidate has gone through a process of upgrading.</p> <p>A Registered Intern Optician may dispense eyeglasses, contact lenses or sub-normal vision devices only under supervision or direction of a registered optician, optometrist or ophthalmologist who is physically present in the place in which the dispensing takes place at the time it takes place.</p>
<p><b>c)</b></p>	<p>Registered Optician</p>	<p>Full eyeglasses and contact lenses license. A Registered Optician is authorized to perform a controlled act of dispensing eyeglasses, contact lenses and/or subnormal vision devices. The holder of the license can use the protected title of "Registered Optician" (RO).</p>

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).

from January 1 <sup>st</sup> to December 31 <sup>st</sup> 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
Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration	0	0	0	0	0	0

Committee						
<b>Applicants who initiated an appeal of a registration decision</b>	0	0	0	0	0	<b>0</b>
<b>Appeals heard</b>	0	0	0	0	0	<b>0</b>
<b>Registration decisions changed following an appeal</b>	0	0	0	0	0	<b>0</b>

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:

The College did not receive any registration internal appeals in 2010.

There were no appeals to HPARB from the decisions of the Registration Committee in 2010.

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: Caroline MacIsaac-Power

Title: Registrar

Date: March 1, 2011

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