Registration Practices Assessment Report
COLLEGE OF AUDIOLOGISTS AND SPEECH LANGUAGE PATHOLOGISTS OF ONTARIO
2018 Assessment (Cycle 3)

AVAILABILITY OF REPORT

This report is provided by the OFC to the regulatory body assessed. The OFC will, upon request, release the report to other parties. The OFC will also post the report on its website. In the interest of transparency and accountability, the OFC encourages regulatory bodies to provide the report to its staff, council members, the public, and other interested parties.

Introduction

This report contains an assessment of registration practices of the College of Audiologists and Speech Language Pathologists of Ontario.

Assessment is one of the Fairness Commissioner's mandated roles under the [Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)](#) and the [Regulated Health Professions Act, 1991 (RHPA)](#) – collectively known as fair access legislation.

Assessment Cycle

One of the primary ways the OFC holds regulators accountable for continuous improvement is through the assessment of registration practices using a [three-year assessment cycle](#).

Assessment cycles alternate between **full assessments** and **targeted assessments**:

- Full assessments address all specific and general duties described in the fair-access legislation.
- Targeted assessments focus on the areas where the OFC made recommendations in the previous full assessment.

In this assessment cycle, certain practices related to provision of information are excluded as the College has previously been assessed in these areas.[1] In most cases, regulators that have previously been assessed have demonstrated compliance with these practices and will only be assessed should substantive changes arise in policies or practices.

Assessment Summary

The Office found the College in compliance with the OFC's fair registration practice standards, and did not identify any recommendations in this assessment cycle.

Specific Duties

Specific duties assessed

The regulator has been assessed on all of the specific duties identified in Schedule 2 of the *Regulated Health Professions Act*, with the exception of practices related to the provision of information.

Comments

The regulatory body has demonstrated compliance with all of the practices in the following specific-duty areas:

- Timely Decisions, Responses and Reasons
- Internal Reviews and Appeals
- Assessment of Qualifications
- Training
- Access to Records

General Duty

Assessment method

The regulator selected the following method for the assessment of the general duty:

a.	OFC practice-based assessment (following the practices in the Assessment Guide)	☑
b.	Regulator practice-based self-assessment (following the practices in the Assessment Guide)	☐
c.	Regulator systems-based self-assessment (in which it explains systemically and holistically how it meets the general duty)	☐

Principles assessed

The regulator has demonstrated compliance with all of the general duty principles: transparency, objectivity, impartiality and fairness.

Comments

The OFC found that since the last assessment, the College of Audiologists and Speech Language Pathologists of Ontario (CASLPO) has taken the following measures to ensure a transparent, objective, impartial and fair registration process.

Commendable Practices

A *commendable practice* is a program, activity or strategy that goes beyond the minimum standards set by the OFC assessment guides, considering the regulatory body's resources and profession-specific context. Commendable practices may or may not have potential for transferability to another regulatory body.

The regulatory body is demonstrating commendable practices in the following areas:

Specific Duty

None

General Duty

Transparency

1. The College has developed a policy that frames the stakeholder consultation process and the posting of stakeholder comments following the public consultation period.

Fairness

1. The Registration Committee reviewed the national language proficiency policy and recommended adjustments to ensure transparency and consistent application of methodology in assigning cut scores.

Opportunities for Improvement

The OFC has not identified substantive opportunities for improvement in registration practices in this assessment cycle.

Assessment History

In the previous assessment the OFC identified six recommendations for the regulator, all of which have been implemented.

Detailed Report[2]

Specific Duty

1. Specific Duty — Information for Applicants

Exempted as previously assessed.

2. Specific Duty — Timely Decisions, Responses and Reasons

FARPACTA, s. 8 and s. 9 (1)
RHPA, Schedule 2, s.20 (1)
Only applies to regulatory bodies governed by FARPACTA

1. If a regulator rejects an application, it gives written reasons to the applicant. [Fairness, Transparency]

Assessment Outcome
Demonstrated

2. The regulator makes registration decisions, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

3. The regulator responds to applicants' inquiries or requests without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

4. The regulator provides internal reviews of decisions, or appeals from decisions, without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

5. The regulator makes decisions about internal reviews and appeals, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

3. Specific Duty — Internal Review or Appeal

FARPACTA, s. 7, s. 9(2-3, 5)
RHPA, Schedule 2, s. 15, s. 17, s. 19, s. 22.3
Only applies to regulatory bodies governed by FARPACTA

1. The regulator provides applicants with an internal review of, or appeal from, registration decisions. [Fairness]

Assessment Outcome

Demonstrated

2. The regulator implements rules and procedures that prevent anyone who acted as a decision-maker in a registration decision from acting as a decision-maker in an internal review or appeal of that same registration decision. [Impartiality]

Assessment Outcome

Demonstrated

3. The regulator provides information on its website that informs applicants about opportunities for an internal review or appeal.* [Transparency]

4. The regulator provides information on its website about any limits or conditions on an internal review or appeal.* [Transparency]

4. Specific Duty — Information on Appeal Rights

Exempted as previously assessed.

5. Specific Duty — Documentation of Qualifications

Exempted as previously assessed.

6. Specific Duty — Assessment of Qualifications

FARPACTA, s. 10 (2)
RHPA, Schedule 2, s. 22.4(2)
Only applies to regulatory bodies that develop and administer their own exams.

1. On its website, the regulator informs applicants about the process, criteria, and policies for the assessment of qualifications. [Transparency]

Exempted as previously assessed.

2. The regulator communicates the results of qualifications assessment to each applicant in writing. [Transparency]

Assessment Outcome

Demonstrated

3. The regulator gives its assessors access to assessment criteria, policies and procedures. [Transparency]

Assessment Outcome

Demonstrated

4. The regulator shows that its tests and exams measure what they intend to measure.* [Objectivity]

Assessment Outcome

Demonstrated

5. The regulator states its assessment criteria in ways that enable assessors to interpret them consistently. [Objectivity]

Assessment Outcome

Demonstrated

6. The regulator ensures that the information about educational programs that is used to develop or update assessment criteria is kept current and accurate. [Objectivity]

Assessment Outcome

Demonstrated

7. The regulator links its assessment methods to the requirements/standards for entry to the profession or trade. [Objectivity]

Assessment Outcome

Demonstrated

8. The regulator requires that assessors consistently apply qualifications assessment criteria, policies and procedures to all applicants. [Objectivity]

Assessment Outcome

Demonstrated

9. The regulator uses only qualified assessors to conduct the assessments. [Objectivity]

Assessment Outcome

Demonstrated

10. The regulator monitors the consistency and accuracy of decisions, and takes corrective actions as necessary, to safeguard the objectivity of its assessment decisions. [Objectivity]

Assessment Outcome

Demonstrated

11. The regulator prohibits discrimination and informs assessors about the need to avoid bias in the assessment. [Impartiality]

Assessment Outcome

Demonstrated

12. The regulator implements procedures to safeguard the impartiality of its assessment methods and procedures. [Impartiality]

> **Assessment Outcome**
>
> Demonstrated

13. The regulator gives applicants an opportunity to appeal the results of a qualifications assessment or to have the results reviewed. [Fairness]

> **Assessment Outcome**
>
> Demonstrated

14. The regulator assesses qualifications, communicates results to applicants, and provides written reasons for unsuccessful applicants, without undue delay. [Fairness]

> **Assessment Outcome**
>
> Demonstrated

15. Regulators that rely on third-party assessments establish policies and procedures to hold third-party assessors accountable for ensuring that assessments are transparent, objective, impartial and fair. [Transparency, Objectivity, Impartiality, Fairness]

> **Assessment Outcome**
>
> Demonstrated

7. Specific Duty — Training

FARPACTA, s. 11.
RHPA, Schedule 2, s. 22.4(3)

1. The regulator provides training for staff and volunteers who assess qualifications or make registration, internal review or appeal decisions. [Objectivity, Impartiality, Fairness]

> **Assessment Outcome**
>
> Demonstrated

2. The regulator addresses topics of objectivity and impartiality in the training it provides to assessors and decision-makers. [Objectivity, Impartiality]

> **Assessment Outcome**
>
> Demonstrated

3. The regulator identifies when new and incumbent staff and volunteers require training and provides the training accordingly. [Objectivity, Impartiality, Fairness]

> **Assessment Outcome**
>
> Demonstrated

8. Specific Duty — Access to Records

FARPACTA, s. 12
RHPA, Schedule 2, s. 16

1. The regulator provides each applicant with access to his or her application records. [Fairness]

Assessment Outcome
Demonstrated

2. If there is a fee for making records available, the regulator gives applicants an estimate of this fee. [Transparency]

Assessment Outcome
Not Applicable

3. If there is a fee for making records available, the regulator review the fee to ensure that it does not exceed the amount of reasonable cost recovery. [Fairness]

Assessment Outcome
Demonstrated

General Duty

FARPACTA, Part II, s.6
RHPA, Schedule 2, S.22.2

Transparency

- Maintaining openness
- Providing access to, monitoring, and updating registration information
- Communicating clearly with applicants about their status

Assessment Outcome

Since the last OFC assessment, the College has implemented new policies or maintained existing policies that demonstrate transparency in assessment processes and practices.

Openness

- The College publishes an annual report that is available on its website. The report includes a Registration Committee report with statistics on international applicants, cases referred to Registration Committee for review, and cases appealed to the Health Profession Appeal and Review Board.
- The College conducts public consultation to seek input from stakeholders on issues related to College governance, such as adjustments to the College's membership fees.
- The consultation process is framed by the policy 'Consultation and Posting of Stakeholder Feedback', that is posted to the College's website.
- Policies and decision-making criteria are readily available to staff and registration committee members.

Access

- The College take measures to ensure that applicants have all relevant information at the time and in the way needed to take actions appropriate to their individual circumstances. For example,
  - Maintains an accommodation policy for members and applicants with disabilities
- The College advises applicants of the progress of their application through e-mailed status updates, including application approval and Registration Committee decisions regarding applications and requests for review.

Clarity

- The College communicates effectively with applicants throughout the registration process. For example:
  - advises applicants of the progress of their application through e-mailed status updates.

Commendable Practice

The College has developed a policy that frames the stakeholder consultation process and the posting of stakeholder comments following the public consultation period.

Objectivity

- Designing criteria and procedures that are reliable and valid
- Monitoring and following up threats to validity and reliability

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Assessment Outcome

The College uses a variety of methods to achieve objectivity in its assessment processes. These methods support a consistent approach to assessments, by promoting a shared understanding of policies, procedures and methodologies among college staff and the registration committee. This is evident from policy documents, examples of tools for decision-makers, and information posted on the College's website.

Reliability

To achieve consistent and reliable decisions, the College takes the following steps:

- develops policies to guide discussion at Registration Committee when discussing whether applicants meet registration requirements
  - The Registration Committee developed a policy that outlines the relevant factors for the Committee to consider when determining if an applicant meets the good character requirement
- provides annual training to all Committee members and staff involved in assessment processes

Validity

Guidelines are published for the mentorship program, establishing policies and procedures including mentor qualifications, duration of contract, and number of mentored hours required.

Impartiality

- Identifying bias, monitoring, and taking corrective action
- Implementing strategies

Assessment Outcome

The College demonstrates processes and procedures that are designed to reduce the potential for impartiality in assessment and decision-making processes.

Identification of Bias

The College's annual training for council and committee members addresses conflict of interest in the context of Committee roles and responsibilities.

Strategies

The College strategies to mitigate bias include:

- The Registration Committee has committed to a discussion of unconscious bias and the potential to influence decision making
- Committee members are required to declare conflict of interest prior to each Registration Committee meeting
- The College's annual training for Council and Committee explains conflict of interest in relation to Committee roles and responsibilities.

Fairness

- Ensuring substantive fairness
- Ensuring procedural fairness
- Ensuring relational fairness

Assessment Outcome

The College exhibits fairness in its registration practices, supported by evidence from policies, annual reports, and Fair Registration Practice reports.

Substantive Fairness

- The Registration Committee reviewed the national language proficiency policy and recommended adjustments to ensure transparency and consistent application of methodology in assigning cut scores

Procedural Fairness

- The College is participating in a national project to update and align assessment practices for internationally educated applicants across provincial and territorial regulatory bodies
- The College assigns an International Applications (IA) Coordinator dedicated to the processing of IA's.

Relational Fairness

The College takes the following actions to promote relational fairness:

- has a process for taking applicants' circumstances into consideration
- has comprehensive policies and procedures to provide accommodations to applicants.

Commendable Practice

The Registration Committee reviewed the national language proficiency policy and recommended adjustments to ensure transparency and consistent application of methodology in assigning cut scores.

Background

Assessment Methods

Assessments are based on the Registration Practices Assessment Guide: For Regulated Professions and Health Regulatory Colleges. The guide presents registration practices relating to the specific duties and general duty in the fair access legislation.

A regulatory body's practices can be measured against the fair access legislation's specific duties in a straightforward way. However, the general duty is broad, and the principles it mentions (transparency, objectivity, impartiality and fairness) are not defined in the legislation.

As a result, the specific-duty and general-duty obligations are assessed differently (see the *Strategy for Continuous Improvement of Registration Practices*).

Specific Duties

The OFC can clearly determine whether a regulatory body demonstrates the specific-duty practices in the assessment guide. Therefore, for each specific-duty practice, the OFC provides one of the following assessment outcomes:

- Demonstrated – all required elements of the practice are present or addressed
- Partially Demonstrated – some but not all required elements are present or addressed
- Not Demonstrated – none of the required elements are present or addressed
- Not Applicable – this practice does not apply to the CASLPO's registration practices

General Duty

Because there are many ways that a regulatory body can demonstrate that its practices, overall, are meeting the principles of the general duty, the OFC makes assessment *comments* for the general duty, rather than identifying assessment outcomes. For the same reason, assessment comments are made by principle, rather than by practice.

For information about the OFC's interpretations of the general-duty principles and the practices that the OFC uses as a guideline for assessment, see the OFC's website.

Commendable Practices and Recommendations

Where applicable, the OFC identifies commendable practices or recommendations for improvement related to the specific duties and general duty.

Sources

Assessment outcomes, comments, and commendable practices and recommendations are based on information provided by the regulatory body. The OFC relies on the accuracy of this information to produce the assessment report. The OFC compiles registration information from sources such as the following:

- Fair Registration Practices Reports, audits, Entry-to-Practice Review Reports, annual meetings
- the regulatory body's:
  - website
  - policies, procedures, guidelines and related documentation templates for communication with applicants
  - regulations and bylaws
  - internal auditing and reporting mechanisms
  - third-party agreements and related monitoring or reporting documentation
  - qualifications assessments and related documentation
- targeted questions/requests for evidence that the regulatory body demonstrates a practice or principle

For more information about the assessment cycle, assessment process, and legislative obligations, see the *Strategy for Continuous Improvement*.

References

1. ^ These includes: all practices from Information for Applicants, practice 3 from Internal Review and Appeals, practice 1 from Information on Appeal Rights, practice 1 from Documentation of Qualifications, practice 1 from Assessment of Qualifications, practice 2 from Access to Records, and practices 4-11 from Transparency of the Registration Practices Assessment Guide.
2. ^ Please note: Suggestions for continuous improvement appear only in the detailed report. Suggestions for improvement are not intended to be recommendations for action to demonstrate a practice, but are made solely to provide suggestions for areas that a regulatory body may consider improving in the future.