

# **2016 Registration Review Report**

## **College of Occupational Therapists of Manitoba**





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## Executive Summary

The Office of the Manitoba Fairness Commissioner (OMFC) 2016 Registration Review Report examines the College of Occupational Therapists of Manitoba (COTM) state of progress with regard to the fair consideration of internationally educated occupational therapists (IEOTs).

COTM has a history of progressive registration practice. Professional work experience is recognized and a supervised practice registry is available that allows a range of qualification gaps to be addressed in the field. Considerable support and assistance is provided to IEOTs throughout the licensure process. Registration timelines for IEOTs are short; registration data for the 2011-2015 period indicate an average of just under 11 months from application to full registration.

In May 2015, COTM's licensure process underwent a significant change with the introduction of Association of Canadian Occupational Therapy Regulators Organizations' (ACOTRO) national Substantial Equivalence Assessment System (SEAS Assessment). The SEAS Assessment recognizes professional work experience and offers an accommodating, staggered application process, reasonable documentation policies and progressive language proficiency policies.

In response to the progress opportunities identified by the Fairness Commissioner, COTM commits to:

1. Contribute to the oversight and monitoring the new SEAS Assessment.
2. Updating registration information regarding the SEAS Assessment.
3. Explore whether other provincial OT regulators will accept transfers of COTM applicants who are qualified but do not meet their employment requirement for registration.
4. Work with ACOTRO to consider how data for Manitoba's IEOTs undertaking the SEAS Assessment may be collected and what can be shared.

The Fairness Commissioner sees COTM's Action Plan as constructive and maintaining the College's longstanding tradition of progressive practice and leadership.

## Introduction

Registration reviews are conducted as part of the Fairness Commissioner's mandate to review the registration practices of regulatory bodies subject to *The Fair Registration Practices in Regulated Professions Act* (Act).

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that registration reviews are to be undertaken at times specified by the Fairness Commissioner. It also stipulates that the content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

The 2016 Registration Review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

In this report, COTM's assessment and registration practice is evaluated in terms of its overall state of fair practice and for the purpose of identifying progress opportunities. This includes an analysis of COTM's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

This report is a public document and will be posted on the OMFC's website, submitted to the Minister of Education and Training and the Minister of Health, Seniors and Active Living.

## Context of the Profession in Manitoba

Occupational therapists (OT) are university-educated professionals who focus on health and well-being. They work in many environments such as health care, the school system, workplaces, social service agencies, correction facilities, the military, etc. to assist individuals, families, groups, and communities. Firstly, the occupational therapy assessment identifies and acknowledges the client's capacity and then to works with the client to achieve the abilities to function in one's own environment. Occupational therapists focus this involvement in the areas of productivity (for e.g., paid or unpaid work, study, volunteering, etc.), self-care (the things one does to care for oneself) and leisure when ability has been challenged by injury, illness, disability or other problems which limit ability.

In Manitoba, the profession is regulated by the College of Occupational Therapists of Manitoba (COTM).

In the 2011-2015 period, 11 internationally educated occupational therapists (IEOTs) landed in Manitoba (Source: Immigration, Refugees and Citizenship as prepared by Manitoba Education and Training). The Canadian Institute of Health Information (CIHI) 2014 report indicates COTM had 599 members educated in Canada and 30 internationally educated members.

Over the last decade, the domestic supply of practitioners in the province has increased largely due to the doubling of enrollment in the University of Manitoba's Master of Occupational Therapy program. At the same time, there are now more OT positions as more practitioners have moved out of health care facilities and into environments such as corrections and social service agencies. Overall the demand for practitioners in Manitoba has declined over the past decade.

Occupational therapy practice in Canada differs from many regions of the world with its emphasis on autonomous practice and the need for patient consent and privacy rights. Consequently, professional orientation and jurisprudence education is valuable for IEOTs.

The COTM licensure process for IEOTs underwent a significant change in May 2015 with the introduction of the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) Substantial Equivalence Assessment System (SEAS Assessment). This is now the first step in the assessment for internationally educated applicants.

In 2012, COTM began formal consultations with its members in preparation to transition under Manitoba's new health legislation, The Regulated Health Professions Act.

Registration data provided by COTM for the 2011-2015 period indicates 11 IEOT applications and 45 domestically educated OT applications. For IEOTs, the average time to full registration from application documents received by COTM was just under 11 months. Small IEOT application numbers does not permit disclosing a more detailed breakdown of IEOT outcomes and timelines.

## Overview of Assessment and Registration Process

The College of Occupational Therapists of Manitoba (COTM) currently operates under the authority of *The Occupational Therapists Act* (2002 C.C.S.M. c. O5) and the Occupational Therapists Regulation (Regulation 174/2005).

Registration with the COTM is mandatory to practise occupational therapy and for the use of the designation of Occupational Therapist in Manitoba.

### Qualification

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There are two principal qualifications needed in order to be eligible for registration as an occupational therapist:

- graduation from an approved occupational therapy academic program
- passing the Canadian Association of Occupational Therapists (CAOT) National Occupational Therapists Certification Exam (NOTCE Exam)

Internationally educated occupational therapists (IEOTs) have their academic qualifications and professional experience assessed for their equivalence to the Canadian education benchmark through the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) Substantial Equivalence Assessment System (SEAS Assessment).

### Application and Assessment Process

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#### Phase 1: Establish Academic Eligibility

For internationally educated applicants, the first step in the process is to apply to ACOTRO for a SEAS Assessment. Applicants that successfully complete this process will be given a statement of candidacy to write the national NOTCE Exam and will be considered by COTM as academically qualified. Applicants must:

1. Arrange a specific ACOTRO credential assessment from World Education Services (WES). This costs \$180 and involves making arrangements for the direct submission of academic credential(s) from the applicant's educational institution(s) to WES.
2. Apply to ACOTRO for the SEAS Assessment; two application forms, identification documentation and a \$200 fee is required.
3. Apply to ACOTRO for a phased assessment, including a Profession-Specific Credential Assessment. Professional work history forms and documentation, language readiness assessment (if necessary, approved language testing), jurisprudence knowledge test and a \$1,100 fee are required.



4. Arrange a Competency Assessment Interview. The day-long, 6 hour interview costs \$1,800 and ACOTRO commits to arranging the interview within 500 km of the applicant's location.

The SEAS Assessment final assessment decision is provided to applicants within 120 days of the interview. Three types of results are possible:

- a) The applicant is deemed to have academic qualification substantively equivalent to the Canadian Standard and is now eligible to write the NOTCE Exam.
- b) The applicant has qualification gaps, but remedial options are identified (language or academic upgrading, supervised practice) to meet equivalence.
- c) Qualification gaps are too significant to be addressed with remedial actions and complete re-training is required to pursue licensure.

### **National Occupational Therapists Certification Examination**

IETs must successfully write the Canadian Association of Occupational Therapists (CAOT) National Occupational Therapists Certification Examination (NOTCE Exam). IETs require an ACOTRO statement of candidacy to be eligible to write the NOTCE Exam.

The exam is a two-part, multiple-choice format test. Applicants must apply to CAOT and pay a \$555 exam fee.

Applicants may postpone writing the exam and provisional registration with COTM is possible for up to two years before the exam must be written.

### **Apply to College of Occupational Therapists of Manitoba**

IETs apply to COTM, completing an application form, providing identification documentation and paying a \$50 application fee. Applicants direct ACOTRO to provide COTM their SEAS Certificate. SEAS certification is accepted by COTM as the qualification requirement to establish the applicant's academic eligibility.

### **Phase 2: Establish Professional Eligibility**

IETs provide COTM documentation about their regulatory history, verification of currency of practice through employment history documentation, and criminal records check. Some of this documentation must be arranged to be sent directly to COTM from the applicant's previous regulators and employers. If documents are not in French or English, the applicant will need to arrange for certified translations.

Upon receipt of all professional eligibility documentation, COTM will inform the applicant of their assessment decision within 4 to 6 weeks.

### Phase 3: Establish Employment Eligibility

For the final phase of the registration process, IEOTs must provide COTM evidence of an offer of employment as well as insurance documentation. An annual pro-rated registration fee is required. In 2016, the annual fee is \$645.

A plan of supervision may also be required if the individual has gaps identified with respect to currency of practice or language proficiency. COTM will identify the level of supervision required and it is the responsibility of the applicant to find employment that can support the needed supervision.

### Appeal Process

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Appeal processes are in place for ACOTRO's SEAS Assessment as well as for COTM's assessment and registration decisions. A \$250 fee is required for ACOTRO's review process. COTM's review process is free of charge and a pre-appeal, reconsideration process is available.

### Time and Cost

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The range of time and cost to be registered with COTM varies depending on the circumstances of the applicant.

The first step, SEAS Assessment costs \$3,100 and will take several months to a year to complete. ACOTRO allows applicants up to a year to complete the assessment. However, additional time and money will be required if academic upgrading is required.

COTM's assessment process can be completed within 2 to 3 months with direct costs totalling \$1,245 (application, NOTCE Exam, registration).

Additional time and costs may be incurred collecting documents and for language upgrading and testing.

COTM's Registration data for the 2011-2015 period reflects its licensure process before the introduction of the SEAS Assessment and indicates time to full registration from completed application was just under 8 months.

## State of Progress

The College of Occupational Therapists of Manitoba (COTM) is committed to the fair assessment and recognition of internationally educated occupational therapists (IEOTs).

COTM has a history of progressive assessment and registration practice for IEOTs. Its supervised practice registry has provided IEOTs a timely and effective way to address gaps in the field. The assessment process was well structured and with the provision of strong personal support for IEOTs.

Since its 2012 registration review, COTM took steps to improve its registration information, introducing:

- A new IEOTs Application Guide
- Steps to Registration and Document Checklist
- Access to records, alternative documentation, as well as appeal and pre-appeal information

This has been remarkably progressive practice and shows what is possible in Manitoba for a mid-sized health profession with a relatively small number of internationally educated applicants.

## New Assessment Process

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COTM's licensure process for internationally educated occupational therapists possesses has undergone a major transition with the introduction of the national Substantial Equivalency Assessment System (SEAS Assessment) in May of 2015. The SEAS Assessment now conducts the assessment of an applicant's academic eligibility formerly conducted by COTM and other provincial regulators (excepting Quebec).

Many aspects of the SEAS Assessment are progressive. Strengths include:

- Qualification standards and criteria are relevant and well grounded. This is a significant step forward in this profession. A nationally harmonized, education benchmark based on ACOTRO's Essential Competencies of Practice for Occupational Therapists in Canada was developed for the SEAS Assessment.
- The SEAS Assessment is multi-modal and focused on competencies and knowledge evident in both academic qualification and professional work experience. Various assessment methods and the ability to assess for qualifications evident in professional work support comprehensive assessment.

Currently, ACOTRO is considering recognizing the applicant's time spent undertaking the SEAS Assessment as supporting the applicant's currency of practice. Recognizing the individual's activity preparing and engaging in professional assessment as an aspect of currency is progressive.

- IEOTs with qualification gaps are advised of opportunities to address gaps through academic upgrading or supervised practice.
- ACOTRO provides a good information package, graduated fee structure and ability to initiate the assessment pre-migration.
- Transparent assessment criteria and process, detailed written reasons for assessment results and review opportunities promote procedural fairness.
- Progressive language proficiency policies are in place. Evidence of language proficiency is accepted in a variety of formats. Applicants may not have to provide language test results upfront for the SEAS Assessment. An applicant's communication performance through SEAS Assessment will be taken into consideration by COTM. Expiration dating on language tests may be waived and supervised practice with COTM may be a way for applicants to address language proficiency issues.

Potential concerns with the new SEAS Assessment are the time and cost added to the process and its impact on COTM's supervised practice program. The SEAS Assessment will take applicants up to a year and cost approximately \$3,100. Before the introduction of the SEAS Assessment, COTM had the ability to allow applicants to meet gaps related to academic qualification under supervision.

The OMFC understands that moving forward supervised practice will be restricted to allow only gaps in currency of practice and language proficiency to be addressed. With the SEAS Assessment, applicants assessed with gaps in academics below standard now need to address this gap before they apply to COTM. This may mean a return to university to undertake coursework or bridge training (only available out of Manitoba). This may have a detrimental impact if it results in a system of licensure that does not provide people a timely, effective way to address qualification gaps.

This is a tentative concern as the SEAS Assessment is too new to comment on its impact for Manitoba IEOTs. Moreover, concern over the restriction of COTM's supervised practice program needs to be seen in light of the ongoing challenges COTM has had working with its applicants and employers to secure these opportunities in a regulated, unionized and increasingly tight OT labour market in Manitoba.

## Fair Practice Analysis

The Fairness Commissioner has identified the need for timely and effective registration, the recognition of qualifications acquired through professional work experience and the need for supervised practice opportunities as key substantive issues critical to realize progress among Manitoba regulators.

Following the Manitoba Fairness Standard, the Fairness Commissioner has the following commendations, comments and concerns about COTM's state of progress concerning these key fairness issues:

### Timely Registration

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*The assessment and registration process is structured efficiently (Manitoba Fairness Standard, 7.1).*

Aspects of COTM's licensure process are efficient. The three phase application process to determine Academic Eligibility, Professional Eligibility and Employment Eligibility, provides a staggered approach to document collection and fee payment. Documents are submitted when needed in a way that minimizes expiration issues. The first two stages of assessment can be initiated pre-migration. Application and assessment timelines are reasonable.

The SEAS Assessment has as a three-point, graduated fee structure and can be started pre-migration. This fee structure is particularly helpful given the significant \$3,100 total cost of the assessment. Applicants that appear unlikely to proceed after the initial academic credential assessment or the profession specific assessment may avoid the \$1,800 fee involved in the Competency Assessment Interview. This is progressive practice.

As gaps in academic qualification can no longer be addressed under supervision, but rather must be dealt with upfront in the licensure process, it remains to be seen whether this will negatively impact the efficiency of the licensure process for IEOTs in Manitoba.

*The assessment and registration process is periodically reviewed to ensure timeliness for internationally educated applicants (Manitoba Fairness Standard, 7.2).*

COTM's assessment and registration process for IEOTs underwent a major review as part of the development of the new SEAS Assessment. COTM and the profession nationally have a history of actively reviewing the occupational therapists licensure process.

*Communication with applicants is timely and systematic (Manitoba Fairness Standard, 7.3).*

COTM's communication with applicants throughout the licensure process is timely and systematic. COTM's staff excel at providing individual assistance and support for internationally educated applicants.

*The registration process is such that qualified internationally educated applicants have an opportunity to practice in some capacity within a year of application (Manitoba Fairness Standard, 7.4).*

The SEAS Assessment was just introduced in May of 2015 and as of September 2016, the OMFC understands COTM has not received an applicant through the SEAS Assessment. Consequently we cannot comment on the precise impact of the new process for the timeliness of COTM's licensure process. However, it is not difficult to see that timelines likely will grow and that for some IEOTs, may grow considerably. Restrictions in COTM's supervised practice registry, where applicants can no longer meet gaps in academics under provisional registration, could mean a longer and costlier road for some. The situation calls for review and monitoring.

Prior to the introduction the SEAS Assessment, COTM's registration data for the 2011-2015 period indicates a timely licensure process that easily met the OMFC's one year timeliness standard. In this period, IEOTs took on average just under **8 months** to receive full registration upon completed application. IEOTs that conditionally registered under supervision with COTM had an even timelier route into practice.

## Recognition of Professional Work Experience

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*Professional work experience is considered to determine qualification (Manitoba Fairness Standard, 5.10).*

COTM considers professional work experience both for the purposes of determining academic eligibility and currency of practice. Assessment of qualifications evident in professional work experience is a focus of the new SEAS Assessment. This is progressive practice.

*Regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience (Manitoba Fairness Standard, 5.11).*

Newly revised standards and criteria were developed for the SEAS Assessment based on ACOTRO's Essential Competencies of Practice for Occupational Therapists in Canada. This is progressive practice.

*If Canadian work experience is a mandatory requirement, it is clearly justified (Manitoba Fairness Standard, 5.12).*

COTM has no mandatory Canadian work experience requirement.

## Supervised Practice Opportunities

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*Supervised practice opportunities are available for the purpose of assessment and gap training (Manitoba Fairness Standard, 5.13).*

The OMFC understands COTM will continue to allow supervised practice opportunities for IEOTs to address currency of practice and language proficiency issues. This is progressive practice as it allows people a timely way to address gaps.

Although ultimately the responsibility of the applicant, COTM staff do considerable work helping its internationally educated applicants find opportunities for supervision.

The restriction in supervised practice opportunities since the introduction of the SEAS Assessment is a potential concern. Formerly, IEOTs could acquire exposure to Canadian practice, address currency issues, pursue academic upgrading and work on language upgrading under supervision. This was a gold standard of progressive practice that supported timely entry into practice and high success rates.

## Additional Fairness Concerns

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*Applicants are provided clear, complete, accurate and easy to find information about:*

- *the steps involved in the registration process (Manitoba Fairness Standard 1.1)*
- *criteria used to assess qualifications (Manitoba Fairness Standard 1.5)*
- *supports the regulator provides or other available supports of which the regulator is aware (Manitoba Fairness Standard 1.11)*

Some of COTM's registration information, specifically the IEOTs Application Guide, needs to be updated to reflect the new SEAS Assessment. Also COTM's Steps to Registration and Document Checklist are no longer available and, if updated, would be a helpful resource.

Although ACOTRO provides good information about its SEAS Assessment, little is said about what remedial opportunities may look like for IEOTs assessed with gaps, just that remedial opportunities will be identified.

COTM registration material also does not explain how it may support IEOTs to complete the SEAS Assessment or what remedial options may be available in Manitoba. We do not see any information regarding the use of supervision to meet currency requirements and language upgrading under supervision. This information would be helpful.

Finally, information provided on the SEAS' and COTM's websites about the English language proficiency requirement and policies are not clear. The SEAS material gives the impression that evidence of language proficiency must be

provided upfront for SEAS certification. The OMFC understands that applicants have the option to wait until they apply to COTM to meet this requirement and that supervised practice may be a possibility. No information is provided about policies surrounding expiration dating for language tests and the consideration of the applicant's communicative performance through the SEAS Assessment. Updated registration information to include complete information about SEAS Assessment and COTM's language proficiency policies is needed.

*Required qualifications are relevant and necessary for competent professional practice (Manitoba Fairness Standard, Element 3).*

To qualify for licensure with COTM, applicants must provide evidence of an offer of employment. The OMFC understands that licensing applicants without employment can create a currency of practice situation if the individual remains unemployed for any significant period of time. This also means otherwise qualified applicants will not be licensed if they cannot find employment.

In Manitoba's increasingly tight, OT market place, the prospect of denying licensure to qualified applicants without a job offer may become more likely. In this circumstance, these applicants may want to pursue practice in another province, but lacking registration, will not be covered under the Agreement on Internal Trade. Qualified applicants without a job offer may also fall out of currency and then be disadvantaged with their non-registered, applicant status. These applicants may face additional costs and documentation requirements that registered members in this circumstance would not.

We understand COTM supports this requirement as it helps avoid work assessing fruitless applications for those intending to work in another province. Moreover, under the new SEAS Assessment, IEOTs will not be re-assessed for academic eligibility by other provincial regulators and can have their application documents held by COTM transferred.

To be fair, policies that ensure individuals are not disadvantaged with their applicant-status, either transferring to other provinces or with other requirements and costs associated with falling out of currency are needed.



## Progress Opportunities

The Fairness Commissioner sees the following opportunities for progress regarding COTM's assessment and registration practice:

1. Monitoring the impact of ACOTRO's new SEAS process and working to mitigate any detrimental impact it may have for IEOTs in Manitoba will ensure progress is maintained.
2. Updated registration information is needed to better reflect COTM's progressive practice regarding language proficiency policies and remedial opportunities for IEOTs in Manitoba.
3. There is a need to ensure COTM's employment requirement for registration does not negatively impact otherwise qualified IEOTs, including those who seek registration out of province and those who may fall out of currency waiting for employment.
4. Work with ACOTRO to collect data for Manitoba IEOTs applying for SEAS certification to better understand their experience.

## Fairness Commissioner's Recommendation

To ensure compliance to The Fair Registration Practices in Regulated Professions Act, the Fairness Commissioner recommends that the College of Occupational Therapists of Manitoba take action regarding these progress opportunities.

## College of Occupational Therapists of Manitoba Action Plan

In response to the Fairness Commissioner's recommendation, COTM proposed the following Action Plan as of November, 2016.

COTM's Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2016 Registration Review to discuss implementation of activities and updates to the Action Plan. Action plan updates will be posted on the OMFC's website on an annual basis, following these meetings allowing any interested party to see the progress to date.

Progress Opportunity	Action(s)	Completion Date
<p>1. Monitoring the impact of ACOTRO's new SEAS process and working to mitigate any detrimental impact it may have for IEOTs in Manitoba will ensure progress is maintained.</p>	<p>As a member of the ACOTRO SEAS Oversight Committee the COTM Executive Director is in the position to contribute to the oversight and monitoring of the implementation of SEAS.</p> <p>The Oversight Committee is developing a robust evaluation plan to monitor and report to the ACOTRO Board on SEAS.</p>	<p>This will be ongoing for the next few years.</p>
<p>2. Updated registration information is needed to better reflect COTM's progressive practice regarding language proficiency policies and remedial opportunities for IEOTs in Manitoba.</p>	<p>This will involve an update to our Guide to Supervised Practice and our Fact Sheet on Language.</p> <p>We will incorporate additional information from the OMFC Position Statement on Language Test Expirations.</p> <p>We will also include information which will link the SEAS Language Readiness processes to the COTM processes to provide clear information as to the impact of the SEAS practices on COTM's requirements.</p>	<p>June 2017</p>
<p>3. There is a need to ensure COTM's employment requirement for registration does not negatively impact otherwise qualified IEOTs, including those who seek registration out of</p>	<p>COTM will explore this with the other OT regulators in Canada to determine if they will accept the transfer of COTM candidates.</p> <p>This will only impact those IEOT's in process of becoming registered with COTM who have not completed the SEAS process. All other subsequent IEOT's will have taken part in the SEAS process and thus will have the foundational educational equivalency</p>	<p>June 2017</p>

Progress Opportunity	Action(s)	Completion Date
<p>province and those who may fall out of currency waiting for employment.</p>	<p>which should facilitate their registration in other jurisdictions.</p> <p>ACOTRO is also confirming its approach to the impact of completing the SEAS process will have on Currency. COTM will update its information on the COTM website and the FAQ on Currency to reflect the new information.</p>	<p>June 2017</p>
<p>4. Work with ACOTRO to collect data for Manitoba IEOTs applying for SEAS certification to better understand their experience.</p>	<p>To provide context to this item it is useful to know that COTM has yet to receive an application for registration from someone who has gone through SEAS; COTM anticipates no more than 5 applicants per year.</p> <p>The SEAS Oversight Committee is developing an evaluation plan for the program. The COTM Executive Director as an ACOTRO Board Director will be in receipt of these reports from the Oversight Committee and will share these with the COTM Board of Assessors.</p> <p>COTM will consider the manner in which we can glean information from MB candidates as to the registration experience as a whole. This will be especially important for those who, through SEAS, were identified as needing bridging or remediation prior to being eligible for provincial registration.</p> <p>COTM will consider what data it can share/report to the OMFC due to the low number of applicants.</p>	<p>June 2018</p>

## Statement of Compliance

The College of Occupational Therapists of Manitoba's Action Plan is a progressive response to the progress opportunities identified in this review. These actions will help ensure and improve fair practice for the assessment and registration of internationally educated occupational therapists (IEOTs) and are consistent with intent of *The Fair Registration Practices in Regulated Professions Act*.

The introduction of the national SEAS Assessment in May of 2015 represents a significant transition in the way IEOTs are assessed. The SEAS Assessment is based on well-defined competencies and uses a variety of methods that support the recognition of professional work experience and a comprehensive assessment of the applicant. SEAS documentation policies and application process are structured in a way that supports IEOT engagement.

The SEAS Assessment replaces a component of COTM's licensure process that had proven very timely, effective and affordable for Manitoba IEOTs. In this context, the goal is to ensure the new SEAS Assessment remains as progressive for Manitoba IEOTs as the process it replaces.

The College has a long history of progressive registration practice and does excellent work supporting its IEOTs. With this history as well as its leadership and active involvement working nationally in the profession, I am confident COTM will do its part to ensure the new process works as intended and look forward to our future engagement.



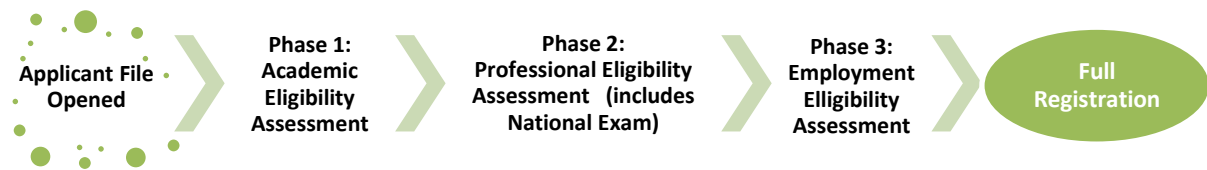
Ximena Munoz  
Manitoba Fairness Commissioner

## Appendix I: 2011-2015 Registration Data

The College of Occupational Therapists of Manitoba (COTM) reports annually to OMFC on the registration of internationally educated occupational therapists (IETs) to Manitoba.

The College of Occupational Therapists of Manitoba (COTM) received 185 applications from 2011 to 2015. Among these applications, 6% or 11 were internationally educated applicants.

IETs received education from 5 different countries. The top country of education was the Philippines for 45% of applicants.



Of the 11 applicants who applied during this period, four or 36% IETs obtained full registration. The average time to obtain full registration was 237 days or just under 8 months.

**Analysis of 2011–2015 regulator data on internationally educated applicants was provided by the Manitoba Bureau of Statistics.**

For additional context, there were 11 immigrant landings for occupational therapists to Manitoba from 2011 to 2015. The NOC code associated with these landings is 3143 Occupational Therapist.

**Source: Immigration, Refugees and Citizenship Canada. Prepared by Manitoba Education and Training.**



## Appendix II: 2016 Registration Review Process

The OMFC's 2016 review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
<b>Registration Review Workshop</b>	<ul style="list-style-type: none"> <li>• Group meeting between OMFC and regulators</li> <li>• Latest data and research presented</li> <li>• Fairness Standard, review focus and process presented</li> <li>• Review schedule provided</li> </ul>	June 10, 2016
<b>Progress Report</b>	<ul style="list-style-type: none"> <li>• COTM report on its fair practice progress</li> <li>• Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities</li> <li>• Progress opportunities identified</li> <li>• Recommendation from Fairness Commissioner to address progress opportunities</li> </ul>	September 28, 2016
<b>Progress Meeting</b>	<ul style="list-style-type: none"> <li>• COTM and OMFC discuss report and possible actions COTM is considering addressing progress opportunities</li> </ul>	October 19, 2016
<b>COTM Action Plan</b>	<ul style="list-style-type: none"> <li>• COTM's Action Plan submitted to OMFC</li> </ul>	November 9, 2016
<b>2016 Registration Review Report</b>	<ul style="list-style-type: none"> <li>• Report submitted to COTM</li> <li>• Report contains the review findings, COTM's Action Plan, and the Fairness Commissioner's Compliance Statement</li> </ul>	November 17, 2016
<b>Registration Review Closeout Meeting</b>	<ul style="list-style-type: none"> <li>• COTM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions &amp; how OOM's action plan will inform the relationship moving forward</li> </ul>	December 15, 2016
<b>Report Release</b>	<ul style="list-style-type: none"> <li>• Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Seniors and Active Living and uploaded on OMFC website</li> </ul>	

### COTM Review participants:

Sharon Eadie, Executive Director

Carmen Funk, Registration and Financial Coordinator

Heather Bartley, Registrar, Board of Assessor's Chair

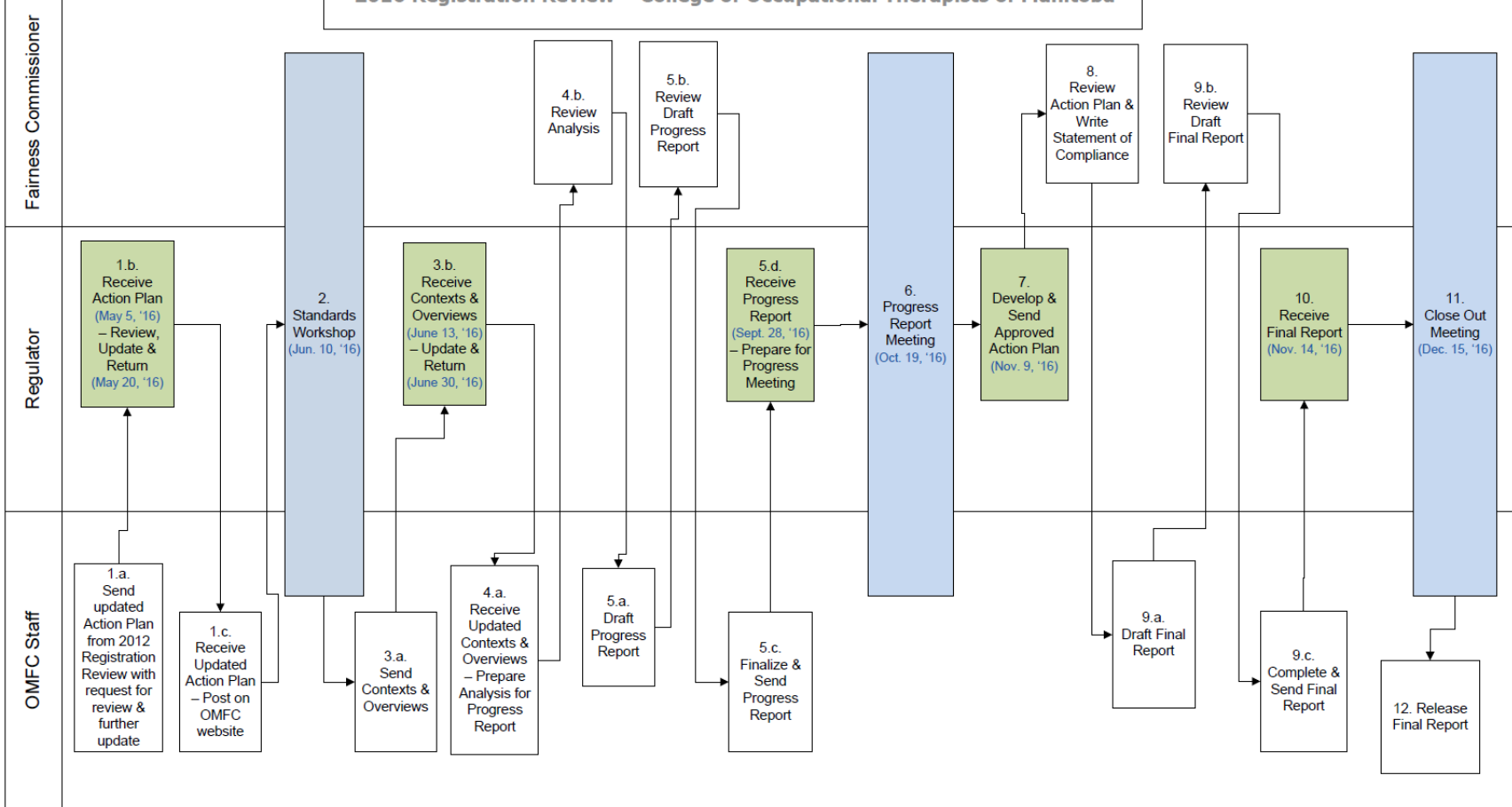




# OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

## 2016 Registration Review – College of Occupational Therapists of Manitoba

June – December 2016









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