

**ACOTRO**

ASSOCIATION OF CANADIAN OCCUPATIONAL  
THERAPY REGULATORY ORGANIZATIONS



**ACORE**

ASSOCIATION CANADIENNE DES ORGANISMES  
DE RÉGLEMENTATION EN ERGOTHÉRAPIE

## 2019 Annual Report



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## PRESIDENT'S MESSAGE

When it comes to professional practice or regulation, consistency is key. Consistency clarifies expectations and supports quality. For ACOTRO, that theme has cut across much of our work this past year. Together, these efforts have strengthened the regulation of occupational therapists (OTs) and advanced public protection.

Consider CORECOM, one of our major projects. This is an initiative to develop one set of core competencies for all OTs in Canada. The project covers entry to practice, university education, and assessments (through the national exam as well as ongoing competency programs). We are working on CORECOM with the Canadian Association of Occupational Therapists (CAOT) and the Association of Canadian Occupational Therapy University Programs (ACOTUP). Funding for CORECOM came in the spring of 2019 from the Government of Canada, and the work is well underway. Having consistent competencies that are expected of all OTs in Canada will ultimately improve practice outcomes and give the public even more confidence in the services they receive from any OT anywhere in the country.

CORECOM also promotes labour mobility when OTs move to work in other provinces, with OTs practising and held accountable to the same standards. On that note, another ACOTRO achievement was reviewing the Labour Mobility Support Agreement, which helps facilitate movement of OTs across the country.

Yet another project that supported consistency across Canada was the position paper about the use of occupational therapy assistants, which all provinces adopted. Working collaboratively around policies like this furthers regulatory excellence.

Fulfilling regulatory requirements involves collaboration with critical partners. We continued to work with the CAOT, which acts as our third-party exam provider. The goal is to ensure that we continue to have appropriate oversight of this essential role. We are also becoming more involved with accreditation of university programs, as part of the expectations of regulatory oversight.

Throughout the year, the provincial representatives on ACOTRO stayed informed about trends in regulation and shared useful resources with each other. Among the trends we looked at was the scope of practice for OTs. As practice evolves, what is appropriate scope? What does evidence-based practice mean? We want to be sure that the public continue to receive safe and appropriate service that is in line with occupational therapy theory and practice.

We looked to improve the consistency of communications with our provincial councils and boards, too. This marked the second year we have had a presidents' meeting. I spoke to the presidents of all the occupational therapy regulatory councils to keep them informed and updated, so that everyone is on same page about ACOTRO's priorities.

Internally, we have strengthened some of our functions, like our finance processes and governance. That helps us to operate more effectively for the benefit of all occupational therapy regulators.



I want to thank our ACOTRO staff and my ACOTRO colleagues for their dedication to meeting our mandate. Thank you especially to Heather Cutcliffe, registrar of the Prince Edward Island College of Occupational Therapists, and Sharon Eadie, executive director of the College of Occupational Therapists of Manitoba, for their tremendous work as part of our ACOTRO Executive.

I am grateful to Kathy Corbett, registrar of the College of Occupational Therapists of British Columbia, for chairing the SEAS Oversight Committee. Her leadership has kept the Substantial Equivalency Assessment System (SEAS) going. This vital program, which assesses internationally educated occupational therapists (IEOTs) across Canada to determine their educational equivalence, continues to grow.

At ACOTRO, we remain committed to promoting best practices in regulation, in service of the public interest.

**Elinor Larney**  
***President, ACOTRO***  
***Registrar, College of Occupational Therapists of Ontario***

## WHO WE ARE

The Association of Canadian Occupational Therapy Regulatory Organizations—or ACOTRO—is the national organization of occupational therapy regulators in Canada. Our goal is to promote consistency and excellence in regulating occupational therapy across Canada.

ACOTRO’s 10 provincial members protect the public by regulating the practice of occupational therapy in their respective provinces. We also provide guidance to OTs seeking information on how to register in Canada.

Through ACOTRO, regulators collaborate to promote the best regulatory practices, enhance public accountability, build consistency across the country, and support each other in our efforts to respond to changes in occupational therapy practice and regulation.

We bring leadership to our profession by

- advancing best practices in occupational therapy regulation,
- developing and promoting a national strategy for consistent regulatory practices,
- promoting interprovincial and international mobility among OTs, and
- strengthening national and international networking and information-sharing.

In practical terms, this means that we work together to streamline processes, advocate, and facilitate change in the regulatory environment.

ACOTRO also administers the assessment process for IEOs. This process assesses the extent to which an OT’s education obtained internationally is substantially equivalent to the education and competencies obtained by OTs educated in Canada.

The ACOTRO Board is appointed by the occupational therapy regulatory organization in each province (see Figure 1). Therefore, each Canadian province has one representative on the ACOTRO Board.

**Figure 1: ACOTRO Member Organizations**





## HISTORY

ACOTRO was established in 1989 and incorporated in 2011. The following sections detail our vision, mission, and values.

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## VISION

Courageous Unified Regulatory Leadership

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## MISSION

Working together for public protection by advancing effective regulation of occupational therapists in Canada

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## VALUES

ACOTRO embraces the following values:

- **Mutual respect:** We recognize all members as equal partners, and we welcome and honour diverse opinions, perspectives, and contributions.
  - **Mentoring and support:** We believe that shared ideas and expertise, reciprocal consultation, and new leader orientation facilitate leadership development and capacity-building.
  - **Trust:** We respect confidences and confidentiality. Decisions are made by consensus, and members speak with one voice publicly.
  - **Excellence:** We use best practices and evidence-based decision-making to support effective leadership and continuous improvement.
  - **Collaboration:** We access collective wisdom by working in partnership with each other and with stakeholders. We create positive relationships and accepting environments that facilitate communication and goal achievement.
  - **Commitment:** We dedicate time and energy to fulfill ACOTRO's goals and objectives. When members cannot fulfill promises, we communicate this and support each other.
  - **Accountability:** We are responsible to each other, to the boards and members of our organizations, and to the public for setting and achieving realistic goals and activities, and for functioning in a transparent manner.
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## GOVERNANCE

All occupational therapy regulatory organizations across Canada belong to ACOTRO and contribute to its activities. The organization is governed by a Board of Directors composed of the registrars or ACOTRO representatives from each of our 10 provincial regulators.

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### ACOTRO MEMBERS 2019

**President: Elinor Larney**

*Registrar, College of Occupational Therapists of Ontario*

**Vice-President: Heather Cutcliffe**

*Registrar, Prince Edward Island College of Occupational Therapists*

**Treasurer: Sharon Eadie**

*Executive Director, College of Occupational Therapists of Manitoba*

**Marianne Baird:** February–December

(Peter Portlock: January)

*Registrar, Alberta College of Occupational Therapists*

**Philippe Boudreau**

*Directeur général et secrétaire, Ordre des ergothérapeutes du Québec*

**Kathy Corbett**

*Registrar & CEO, College of Occupational Therapists of British Columbia*

**Kim Doyle**

*Executive Director, Newfoundland and Labrador Occupational Therapy Board*

**Sherry Just**

*Executive Director, Saskatchewan Society of Occupational Therapists*

**Catherine Pente**

*Registrar, New Brunswick Association of Occupational Therapists*

**Kevin Wong:** May–December

(Jonathan Belbin: January–May)

*Registrar, College of Occupational Therapists of Nova Scotia*

There is no regulatory organization in Yukon, Nunavut, or the Northwest Territories. OTs in these regions may be registered by regulatory organizations in other provinces.



## STAFF

Susan Domanski, SEAS Manager

Ruheena Sangrar, SEAS Credentialing Officer (until January 4, 2020)

Suzanne Cunningham, SEAS Associate

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## ACTIVITIES IN 2019

During 2019, ACOTRO members welcomed learning opportunities, engaged in presentations, and implemented processes and improvements in alignment with the current strategic plan initiatives.

### Strategic Plan Initiatives

ACOTRO members have engaged in discussions on various important topics to increase awareness and to bring about more consistent occupational therapy regulatory processes across Canada. These topics include interjurisdictional practice, controlled acts, medical assistance in dying, and scope of practice.

### Presentations

- On February 25, ACOTRO received a presentation from Alison Douglas of the CAOT on the accreditation process for university programs and opportunities for regulator involvement.
- At the CAOT Conference in Niagara Falls on May 31, ACOTRO, along with CORECOM Steering Committee members from the CAOT and ACOTUP, presented an update about the CORECOM Project: “Creating One Competency Document for Canadian Occupational Therapists.”
- On June 12, ACOTRO provided its annual update webinar on SEAS to the provincial occupational therapy regulators.
- On November 11, ACOTRO received a presentation about scope of practice from Julie Maciura from Steinecke Maciura LeBlanc.
- ACOTRO provided an update on the strategic plan and progress to all the regulatory body presidents or board chairs during a teleconference on December 3.

### Position Statement

ACOTRO created a position statement document regarding the use of occupational therapy assistants in occupational therapy service delivery.

### Governance

Over the past year, the Governance Committee expanded the governance policies to increase ACOTRO’s organizational efficiencies and effectiveness.



## Labour Mobility Support Agreement

The Labour Mobility Support Agreement was reviewed and signed after being revised for the following reasons:

- to recognize that this agreement now operates under the Canadian Free Trade Agreement rather than the Agreement on Internal Trade,
- to acknowledge the regulators' acceptance of a maximum of three attempts at successfully completing the national exam in jurisdictions where the exam is a registration requirement,
- to restate a common currency requirement to support mobility, and
- to reaffirm the commitment to mobility-enabling strategies on language policy and objective member assessment as part of provincial quality assurance or continuing competence programs.

## CORECOM

ACOTRO, the CAOT, and ACOTUP have continued to work on a collaborative initiative to develop a single competency document that will outline entry-to-practice competencies and describe competencies used throughout occupational therapy practice. The group received funding approval from the Government of Canada's Foreign Credential Recognition Program in 2019. The competency framework was confirmed, and the process of competency development has been initiated.

## National Exam Oversight

To fulfill part of the regulatory role in overseeing activities used to assess entry-to-practice requirements, one ACOTRO representative attends the Certification Exam Committee business meetings of the CAOT and ensures that the exam report is distributed to all ACOTRO members.

The Exam Oversight Committee, first established in 2017, is made up of a representative from each regulatory organization, the director of standards for the CAOT, a CAOT Board member, and members of the Certification Exam Committee. The Exam Oversight Committee met twice this year by teleconference to discuss and approve guidelines and policies related to the exam and its administration. A provincial regulator (member of ACOTRO) chairs this committee.

The members of the Exam Oversight Committee decided, on the recommendation of the CAOT director of standards, to meet four times per year in order to facilitate the approval of new and revised exam policies in a timely manner.

In addition, the regulatory bodies in all provinces where the national exam is a registration requirement approved an agreement with the CAOT to formalize this relationship. ACOTRO has engaged in ongoing discussions with the CAOT to progress with more consistent exam processes for all ACOTRO members.



## SEAS: Substantial Equivalency Assessment System

SEAS is the first step in the assessment process for all IEOTs applying to register anywhere in Canada outside of Quebec.<sup>1</sup> SEAS is a program operated by ACOTRO and used by 9 of the 10 occupational therapy regulators to confirm that an applicant in a specific province meets substantial equivalence, and as such, is eligible to apply for registration or licensure in that jurisdiction. SEAS assesses the extent to which an IEOT’s education and competencies are substantially equivalent to those of Canadian-educated OTs. Its components address both qualification recognition and competence verification:

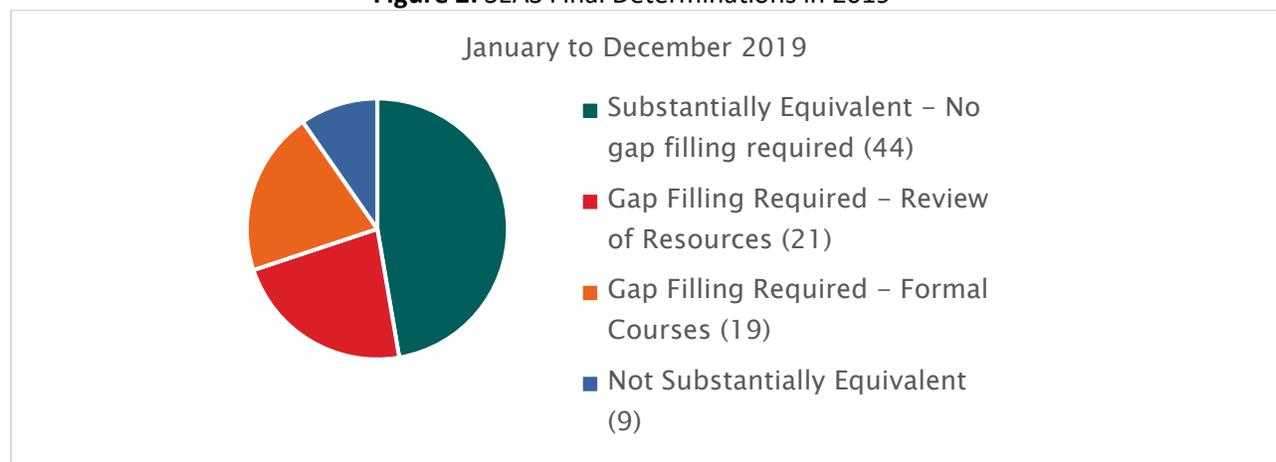
- Academic Credential Assessment (ACA);
- Profession-Specific Credential Assessment (PSCA);
- Competency Assessment (CA);
- Jurisprudence Knowledge Assessment Test (JKAT); and
- Language Readiness Assessment.

The number of IEOT applicants in 2019 increased compared with 2018, with applicant numbers reaching the forecasts expected for the program. SEAS is funded through applicant fees. Reporting to the ACOTRO Board, the SEAS Oversight Committee is responsible for overseeing the program’s management and operations.

### 2019 Program Highlights

When an applicant completes the SEAS process, the SEAS Determination Committee reviews the results and determines whether the applicant’s educational qualifications and competencies are substantially equivalent to those of a graduate from a Canadian program. The assessment system is also designed to identify where areas may exist that require upgrading or gap filling for the IEOT to meet the substantial equivalency requirement. Figure 2 shows the number of IEOTs that were required to complete some level of gap filling in 2019.

**Figure 2: SEAS Final Determinations in 2019**



<sup>1</sup> As a full member of ACOTRO, Quebec’s regulatory organization, Ordre des ergothérapeutes du Québec, has fully endorsed SEAS and participated in its development. However, Quebec employs its own assessment system for the evaluation of IEOTs registering to practise in that province according to the specific regulations and competencies set out by the Ordre des ergothérapeutes du Québec. There is no regulation of OTs in the territories.

In May 2019, an ACOTRO forum (sponsored by the College of Occupational Therapists of British Columbia and the College of Occupational Therapists of Ontario) brought together a range of stakeholders to address the need to have more options for, and improved access to, gap-filling or upgrading activities. One of the outcomes was a risk-based decision-making framework to guide decisions on gap filling and meet our objective of having the right touch related to the gap-filling requirements. More options for gap filling and upgrading are desirable, and follow up on the forum results is planned.

Succession planning for Determination Committee panel members was triggered when members reached the expiry of their respective appointment terms. Three members agreed to reappointment, and recruitment of three new members was initiated.

The Annual SEAS Update webinar was held in June 2019 to provide provincial occupational therapy regulators and their registration committees and staff with an update on the program statistics and activities. For continuous quality improvement, the webinar also provides the opportunity to hear from provincial regulators about any concerns, respond to questions, and seek feedback from those regulators receiving IEOT applicants. This event is very well received.

Operational review resulted in changes in staffing, both in duties and staff time. With the specific skill set required for financial and administrative duties, the associate position was increased to three days per week, and a one-day-a-week, onsite bookkeeper was added. The operational review identified areas where efficiencies and process flow could be enhanced, and the plan for 2020 is to shift tasks between the bookkeeper, associate, and credentialing officer to best use the skills of these positions.

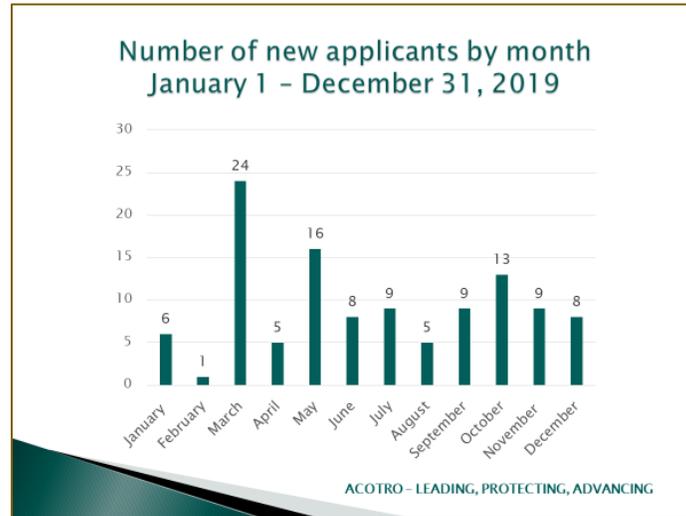
#### *SEAS Applicant Statistics for January 1, 2019, to December 31, 2019*

The number of applicants to SEAS continues to grow and is reaching forecasted levels. In 2019, there were 113 new applicants, compared with 93 new applicants in 2018 (see Figure 3). By December 31, 2019, 95 CAs had been conducted, compared with 66 in 2018. There was also a significant increase in the number of applicants who completed the full SEAS program in 2019 compared with all previous years (see Figure 4).

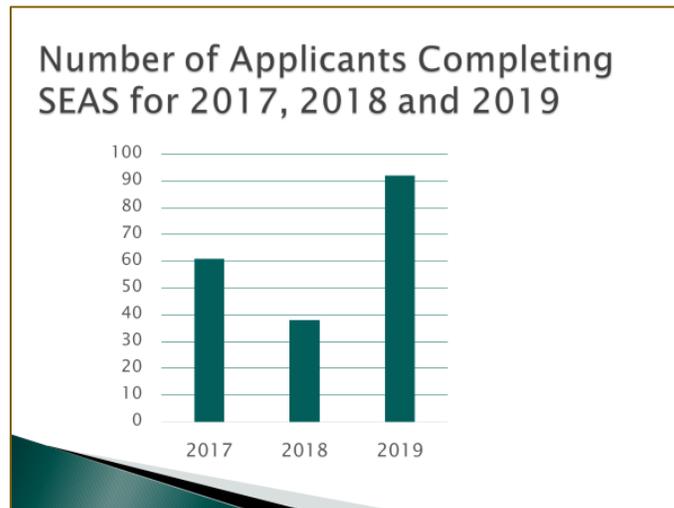
SEAS is applicant driven. A significant portion of applicants continue to complete the SEAS program within 7–12 months from their initial SEAS application date. Forty-eight percent (48%) completed the program well within the 1-year timeline (see Figure 5). The percentage of applicants completing the process in over 12 months increased slightly compared with 2018. This was due in part to the number of applicants who started SEAS in 2017 and requested two extensions, for reasons such as illness or difficulty obtaining curriculum documents. Delays were also driven by applicants requesting a second PSCA, which backlogged the processing. There were four requests to retake the CA in 2019.

Figure 6 shows the province of registration for applicants who completed SEAS anytime from 2016 to 2019.

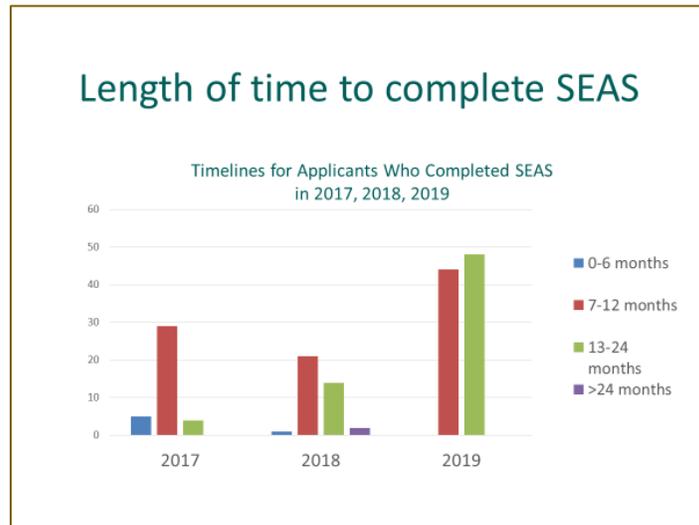
**Figure 3:** Number of New Applicants per Month in 2019



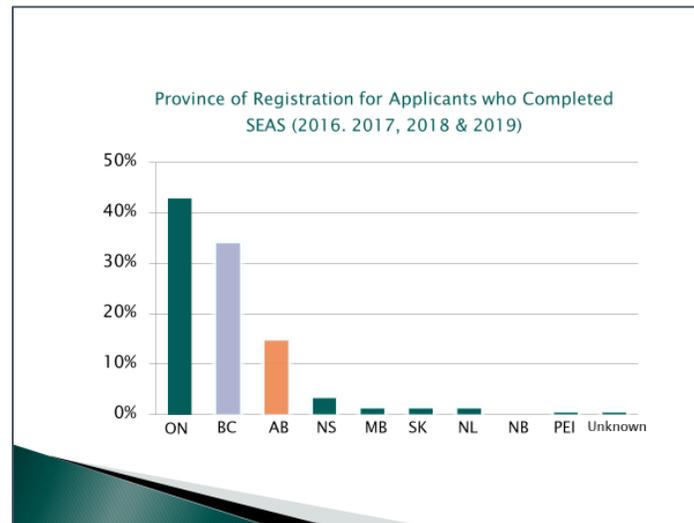
**Figure 4:** Number of Applicants Completing SEAS by Year



**Figure 5: Timelines to Complete SEAS (2017, 2018 & 2019)**



**Figure 6: Province of Registration for Applicants Who Completed SEAS (2016–2019)**





## **OTA/PTA Steering Committee**

ACOTRO is a member of the Vision OTA/PTA Steering Committee, along with other key stakeholder groups: the CAOT, Canadian Physiotherapy Association, National Physiotherapist Assistant Assembly, Canadian Alliance of Physiotherapy Regulators, Physiotherapy Education Accreditation Canada, and the Occupational Therapist Assistant and Physiotherapist Assistant Education Accreditation Programs.

In the fall of 2018, two online discussions were held to respond to topics from a national OTA/PTA survey conducted by the OTA/PTA Visioning Project and completed in 2017. The online discussions focused on the current and future state of issues such as competency profiles, consistency of title, regulation versus registration or certification, and membership in professional associations. An executive summary of the online discussions was circulated to stakeholders for feedback. Next steps include revising and recirculating the executive summary and determining a chair for the steering committee.

## **OT Canada Reflection Day 2019**

The OT Canada Reflection Day, 5 Heads Are Better Than 1: Advancing Occupational Therapy through Co-Construction, was held on May 29. Representatives from ACOTRO, ACOTUP, the CAOT, the Alliance of Canadian Occupational Therapy Professional Associations, and the Canadian Occupational Therapy Foundation learned about how co-construction can be used as an ongoing process among stakeholders to develop sustainable solutions. Participants practised using the process of co-construction to openly discuss important topics while recognizing and respecting the differing stakeholder mandates and perspectives.

## **Truth and Reconciliation Commission of Canada: Calls to Action**

The ACOTRO Board's strategic priorities include influencing systemic change. Hence, ACOTRO has created the goal of establishing principles and strategies to integrate Indigenous cultural safety into the organization, influence regulatory organizations, engage with stakeholders, and determine a potential regulatory impact on occupational therapy practice.

Key objectives in the ACOTRO Strategic Plan include the following:

- reviewing and revising regulatory processes to support Indigenous cultural safety and humility;
- participating in efforts regarding Truth and Reconciliation Commission recommendations and Calls to Action;
- influencing occupational therapy practice;
- revisiting the Calls to Action to confirm alignment of ACOTRO priorities; and
- integrating Indigenous cultural safety and humility into the CORECOM initiative.

Activities undertaken in 2019 included these:

- a review of potential initiatives that can be undertaken at the personal, Board, and organizational levels; and



- preparations with key national occupational therapy partners for the OTC Reflection event in May 2020 in Saskatoon, which will have a focus on the Truth and Reconciliation Commission Calls to Action.

ACOTRO members recognize that demonstrating our commitment to Indigenous cultural safety and humility is a journey—one that needs attention to continuous learning, reflection, and deliberate steps to improve integration of culturally safe practices within occupational therapy regulation. Our activities planned for 2020 will ensure we stay focused on that journey.

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