



ACOTRO
ASSOCIATION OF CANADIAN OCCUPATIONAL
THERAPY REGULATORY ORGANIZATIONS



ACORE
ASSOCIATION CANADIENNE DES ORGANISMES
DE RÉGLEMENTATION EN ERGOTHÉRAPIE

2023 ANNUAL REPORT

Association of Canadian Occupational Therapy Regulatory Organizations

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**LEADING, PROTECTING, ADVANCING
DIRIGER, PROTÉGER. PROGRESSER**

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PRESIDENT'S MESSAGE



I am pleased to present the highlights of our work for the year 2023. While the pandemic is no longer in the forefront, its effects continue to be felt in health care. Of note, this year regulators addressed the need to facilitate access to necessary

remote occupational therapy services that cross provincial borders. ACOTRO is pleased that we were able to coordinate a memorandum of understanding that facilitates regulatory accountability when occupational therapists practise remotely in another province. Almost all regulators were able to commit to holding their registrants accountable for their services when delivered remotely in another province. This means registrants may practise remotely in many other provinces without the need for additional registrations. Our view is that practice is occurring where the therapist resides. This memorandum of understanding facilitates access to needed services while ensuring that the public has access to regulatory intervention if needed.

We continue to be proud of the work completed by our Substantial Equivalency Assessment System (SEAS) towards the competency assessment of internationally educated occupational therapists (IEOTs). Our applications for IEOTs to begin this first step towards working in Canada continue to be higher than predicted. This has necessitated a critical look at our processes to enhance efficiency. We look forward to implementing some changes in the next year and beyond.

ACOTRO's work involves key partners across the country. We collaborate about our entry-to-practice processes—namely, the delivery of the National Occupational Therapy Certification Exam (NOTCE) and accreditation of educational programs for occupational therapy. We are pleased to have collegial relationships with the Canadian

Association of Occupational Therapists (CAOT) as well as the Association of Canadian Occupational Therapy University Programs, where we are involved with the policies around the NOTCE and university programs. We worked with these partners this past year to review the processes that lead to accreditation of these educational programs in Canada. We look forward to furthering this work over the next year.

ACOTRO is also keenly aware of the health human resources shortages in Canada. ACOTRO provides data to the Canadian Institute for Health Information (CIHI) to inform health human resources planning. Canada clearly has a shortage of occupational therapists. Regulators have a part to play in alerting our partners to this concern as well as in ensuring that no unnecessary barriers to practice exist. Our work on remote practice and re-entry will support health human resources efforts, as will any efficiencies gained through our work with the SEAS program.

Finally, we are pleased to have been part of the work on the joint position statement developed by the profession about equity and justice. This work is in line with our national competencies for occupational therapists and is vitally important as a guidepost now and into the future.

As I look back on 2023, I am inspired by the collaborative spirit of the regulators of occupational therapists across the country. With all that is going on in each of our respective jurisdictions, we prioritize working together to ensure that regulation is as consistent as possible, is high quality, and supports safe and effective occupational therapy for the public. Thank you to the leaders in each occupational therapy regulatory organization for your efforts.

Elinor Larney
PRESIDENT, ACOTRO
Registrar & CEO, 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 occupational therapists 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

labour mobility among occupational therapists

- Strengthening national and international networking and information-sharing

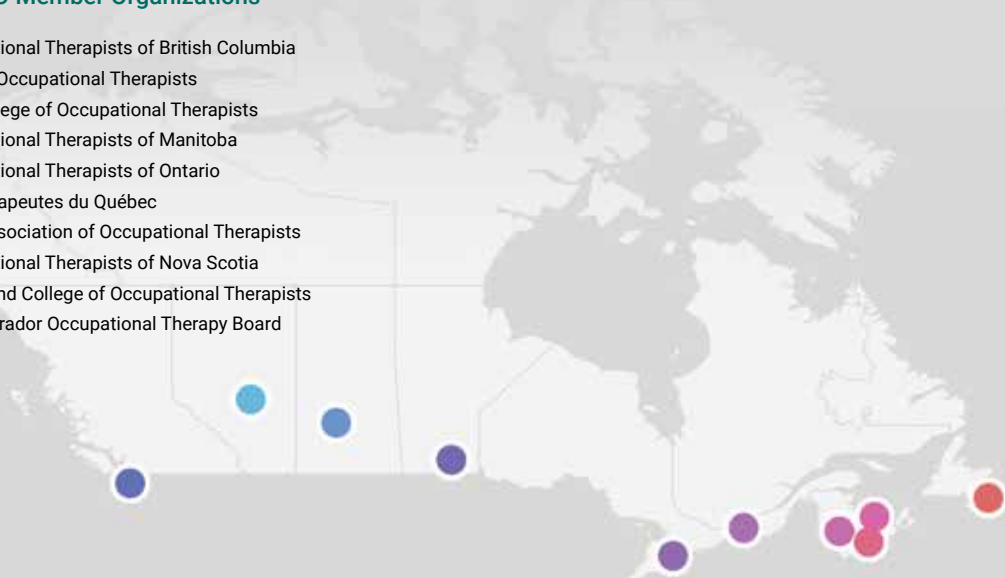
In practical terms, this means that we work together to streamline processes and facilitate change in the regulatory environment.

ACOTRO also administers the assessment process for IEOTs. This process assesses the extent to which an occupational therapist's education obtained internationally is substantially equivalent to the education and competencies obtained by occupational therapists educated in Canada.

Each occupational therapy regulatory organization in Canada appoints one ACOTRO Board member. (see Figure 1). Therefore, each Canadian province has one representative on the ACOTRO Board.

FIGURE 1: ACOTRO Member Organizations

- College of Occupational Therapists of British Columbia
- Alberta College of Occupational Therapists
- Saskatchewan College of Occupational Therapists
- College of Occupational Therapists of Manitoba
- College of Occupational Therapists of Ontario
- Ordre des ergothérapeutes du Québec
- New Brunswick Association of Occupational Therapists
- College of Occupational Therapists of Nova Scotia
- Prince Edward Island College of Occupational Therapists
- Newfoundland Labrador Occupational Therapy Board



HISTORY

ACOTRO was established in 1989 and incorporated in 2011.

VISION

Courageous Unified
Regulatory Leadership

MISSION

We work proactively together for public protection by advancing effective regulation of occupational therapists in Canada.



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 transparently.

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.

ACOTRO MEMBERS 2023

PRESIDENT: Elinor Larney

Registrar & CEO, College of Occupational Therapists of Ontario

VICE-PRESIDENT: Kim Doyle

Executive Director, Newfoundland and Labrador Occupational Therapy Board

TREASURER: Kevin Wong

Executive Director and Registrar, College of Occupational Therapists of Nova Scotia

Marianne Baird

CEO and Registrar, Alberta College of Occupational Therapists

Nicole Charpentier

Registrar, Ordre des ergothérapeutes du Québec

Heather Cutcliffe / Colleen MacPherson

Registrar, Prince Edward Island College of Occupational Therapists

Sherry Just

Executive Director, Saskatchewan College of Occupational Therapists

Natalie MacKenzie

Registrar, New Brunswick Association of Occupational Therapists

Michelle Martin-Strong

Executive Director, College of Occupational Therapists of Manitoba

Carin Plischke

Registrar and CEO, College of Occupational Therapists of British Columbia

Neither Yukon, Nunavut, nor the Northwest Territories have a regulatory organization. Occupational therapists in these regions may be registered by regulatory organizations in other provinces.

STAFF & CONTRACTORS

Susan Domanski, SEAS MANAGER

Suzanne Cunningham, SEAS ASSOCIATE

Vanilda Ferreira, SEAS ASSOCIATE

ACTIVITIES IN 2023

ACOTRO members worked together to address the diverse challenges impacting the regulation of occupational therapy nationwide. ACOTRO engaged in discussions with numerous interested third parties to accomplish mutual objectives and finalize collaborative initiatives.

ACTIVITIES IN 2023

Strategic Plan Initiatives

ACOTRO members actively participated in discussions and initiatives aimed at enhancing the consistency of occupational therapy regulatory procedures throughout Canada. Key focal points encompassed tackling cross-

jurisdictional remote practice challenges, working towards developing a re-entry framework, and engaging in Truth and Reconciliation endeavours.

Governance

Over the past year, the Governance Committee refreshed several existing policies and terms of reference, to enhance ACOTRO's organizational efficiencies and effectiveness. Procedures were developed for appointing new Board Directors, when

necessary, between annual general meetings. The Governance Committee also sought input on its orientation checklists for Board mentors and mentees and refined the risk register with updated information.

Consistent Re-Entry Framework

Re-entry is the process of confirming competency to return to practice following an absence from practice. ACOTRO members identified a need to review our current re-entry programs and committed to develop a program framework to harmonize re-entry practice requirements and ensure that key program elements are

consistent with other ACOTRO regulatory endeavours. This framework will include a process for applicants and an assessment to determine the readiness of applicants to return to practice. Once developed, the new framework will be made available for adoption by ACOTRO members for program implementation.

National Exam Oversight

One of the key functions of regulation is to set and maintain the entry-to-practice standards for the profession. This includes approving an examination that assesses entry-level competence. The NOTCE, administered by the CAOT, is the approved exam and a regulatory requirement for registration in 9 of the 10 Canadian jurisdictions.

The Exam Oversight Committee was established in 2017 to review and recommend policies associated with the administration of the NOTCE. The committee provides recommendations to the Certification Exam Committee, which coordinates all activities connected with the construction, administration, and validation of

the NOTCE and its study resources.

The Exam Oversight Committee includes the registrar (executive director or CEO) of each provincial regulator and the Certification Exam Committee chairperson or designate. Non-voting members consist of a CAOT Board appointee, one other Certification Exam Committee member, and the CAOT CEO or designate (for example, director of standards). A provincial regulator (ACOTRO member) chairs the Exam Oversight Committee. One ACOTRO representative attends the Certification Exam Committee business meetings, which supports involvement in important administrative decisions.

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ACTIVITIES IN 2023 CONTINUED

The Exam Oversight Committee met three times in 2023 by teleconference, to fulfill its mandate. The exam will continue to be offered using a hybrid approach, allowing candidates to choose between in-person testing centres and live remote proctoring. The NOTCE was offered three times in 2023. The Exam Blueprint Working Group completed its mandate and developed a new exam blueprint that maps the exam to the Competencies for Occupational Therapists in Canada, 2021. Continuing

work is taking place to develop more questions for the NOTCE that assess the new competencies, with a goal of finalizing this work by September 2026 to deliver an exam based on these competencies.

Regulators are provided with the annual examination report, which assists the ACOTRO member organizations in meeting their statutory obligations related to the use of third-party entities (in this case, the CAOT).



Presentations

FEBRUARY 2

The boards, staff, and registration committees of each ACOTRO member were invited to attend the annual SEAS presentation to keep them abreast of current information about the program.

FEBRUARY 15

During the ACOTRO Board meeting, Sue Glover Takahashi and Mary Clark provided a session to ACOTRO members about their work towards a revised re-entry program.

FEBRUARY 16

Louise Logan educated ACOTRO Board members about Navigating and Negotiating Sensitive Situations. Louise facilitated a follow-up discussion on September 27 about our re-entry program work and the next steps towards creating a consistent approach to re-entry.

FEBRUARY 17

Julie Maciura, legal counsel of Steinecke Maciura LeBlanc, shared information with the ACOTRO Board about jurisdictional matters and virtual care.

MAY 12

ACOTRO members presented at the CAOT Conference about the regulatory processes for new IEOTs in Canada and the regulatory role's effect on human health resources.

NOVEMBER 29

Kim Woodland, director of programs from the College of Occupational Therapists of Ontario, gave a presentation on the current CIHI statistics related to occupational therapists in Canada. Leandri Engelbrecht, manager of registration at the College, offered information and led a discussion about a future project aimed at collecting race-based data.

DECEMBER 7

ACOTRO President Elinor Larney provided a virtual presentation to the provincial regulatory board chairs and presidents about ACOTRO's current initiatives and activities.

ACTIVITIES IN 2023 CONTINUED

Canadian Institute for Health Information

The Canadian occupational therapy regulators provide their provincial registrant data to CIHI, while the CAOT submits data on occupational therapists who work in the territories, where professional regulation for occupational therapists does not exist. The information provided to CIHI populates the Occupational Therapy Database and the Health Workforce Database. Representatives from CIHI held a virtual meeting with occupational therapy data providers, including ACOTRO members.

Canadian Institutes of Health Research

ACOTRO acted in an advisory capacity and sponsored a project that examined whether the use of evidence-based practice deteriorates after graduation.



Cross-Jurisdictional Remote Practice Memorandum of Understanding

In 2023, ACOTRO continued the discussions and work of developing a memorandum of understanding for cross-jurisdictional remote practice. The memorandum addresses the regulatory matters and actions that arise when residents physically located in another province access services from an occupational therapist providing services remotely. Because individual provincial jurisdictional requirements vary, any significant registration requirements and pertinent differences are outlined within the memorandum.

Accreditation Governance Review

ACOTRO participated on a steering committee for occupational therapy accreditation governance with representatives from CAOT and the Association of Canadian Occupational Therapy University Programs (ACOTUP). The committee worked to develop recommendations for the future governance model for accreditation of entry-to-practice occupational therapy programs in Canada.

ACTIVITIES IN 2023 CONTINUED

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.¹ 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 occupational therapists. Its components address both qualification recognition and competence verification:

- Academic Credential Assessment
- Language Readiness Assessment
- Profession-Specific Credential Assessment
- Jurisprudence Knowledge Assessment Test
- Competency Assessment (CA)

SEAS is funded through applicant fees. Reporting to the ACOTRO Board, the SEAS Oversight Committee is responsible for managing the program. We continue to monitor the changes in the number of applicants each year since the pandemic started in 2020 and will continue to do so into 2024.

2023 PROGRAM HIGHLIGHTS

The number of IEOT applicants in 2023 decreased to 165, compared with 177 in 2022, with applicant numbers still exceeding the quarterly forecast and the yearly forecast of 157 for the program.

Remote Delivery of CAs

The pandemic significantly impacted SEAS. Following the decision in mid-March 2020 to cancel all scheduled

CAs, the only in-person assessment component of SEAS, COVID-19 contingency planning was put in place. As the pandemic progressed, it became clear that returning to in-person administration would not be feasible. The CA was transitioned to remote delivery, which was launched on November 16, 2020. This approach is now permanent and has facilitated an applicant's ability to complete their CA anywhere in the world. Last year, 56% of applicants completed their CAs in Canada, while 44% completed them in their home country. The entire SEAS program can now be completed from anywhere in the world. This has reduced barriers for IEOTs, such as travel costs and obtaining a visa to come to Canada for the purpose of completing the CA.

Critical Thinking, Clinical Reasoning and Application in Canadian Occupational Therapy Course

In June 2022, McMaster University discontinued its OT Practice Preparation program, which had been providing courses to IEOTs who require gap-filling to achieve substantial equivalency. ACOTRO worked with the University of Alberta Department of Occupational Therapy to develop an updated alternative program for these IEOTs. A total of 61 IEOTs attended the course between July 2022, when the first pilot ran, and December 2023, when the fourth cohort completed their course. ACOTRO and the University of Alberta have enacted a course administration agreement for the university to provide the course, now retitled Critical Thinking, Clinical Reasoning and Application in Canadian Occupational Therapy, two to three times annually. Feedback from those who have completed the course has been positive overall.

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¹ 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. Occupational therapists are not regulated in the territories.

ACTIVITIES IN 2023 CONTINUED

Annual SEAS Update for Canadian Occupational Therapy Regulators

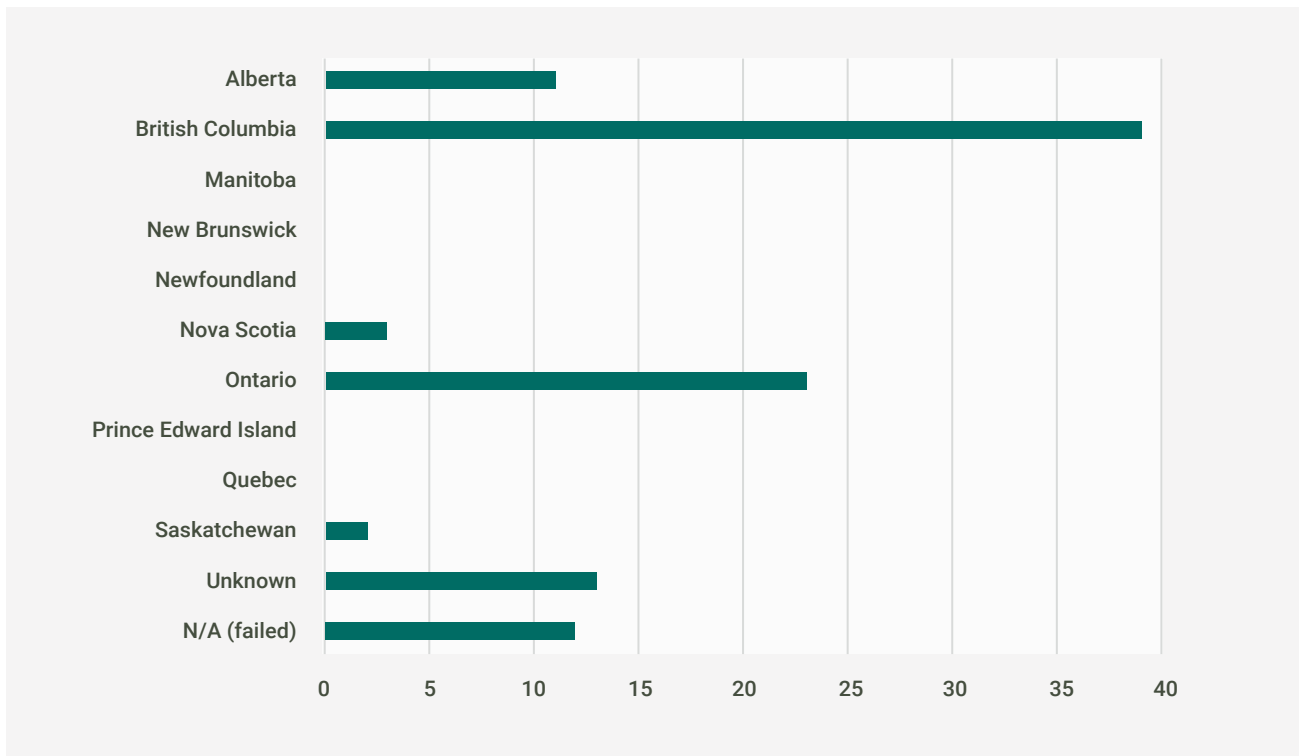
The Annual SEAS Update webinar was held on February 2, 2023, to provide provincial occupational therapy regulators and their registration committees and staff with an update on the program. This update focused on the overall increase in the number of SEAS applicants over time and the plan for monitoring the impact of this change.

APPLICANT STATISTICS FOR JANUARY 1 TO DECEMBER 31, 2023

With the launch of the remote delivery of the CA on November 16, 2020, the timelines for completion of

SEAS were improved. The number of IEOTs completing SEAS in 2023 was 107 (Figure 2), down from 111 in 2022. Figure 3 lists the countries where the 107 IEOTs completed their occupational therapy education. In 2023, the program saw an increase in applicants from countries where Canadians typically complete their international occupational therapy education (Australia, the United Kingdom, and the United States) and a continued increase in the number of applicants from Hong Kong. The number of new applicants increased steadily between 2020 and 2022, then decreased slightly in 2023 but was still in the projected range (Figure 4).

FIGURE 2: Number of Applicants Completing SEAS in 2023 and Intended Province of Practice



ACTIVITIES IN 2023 CONTINUED

FIGURE 3: Country of Occupational Therapy Education for Applicants Completing SEAS in 2023

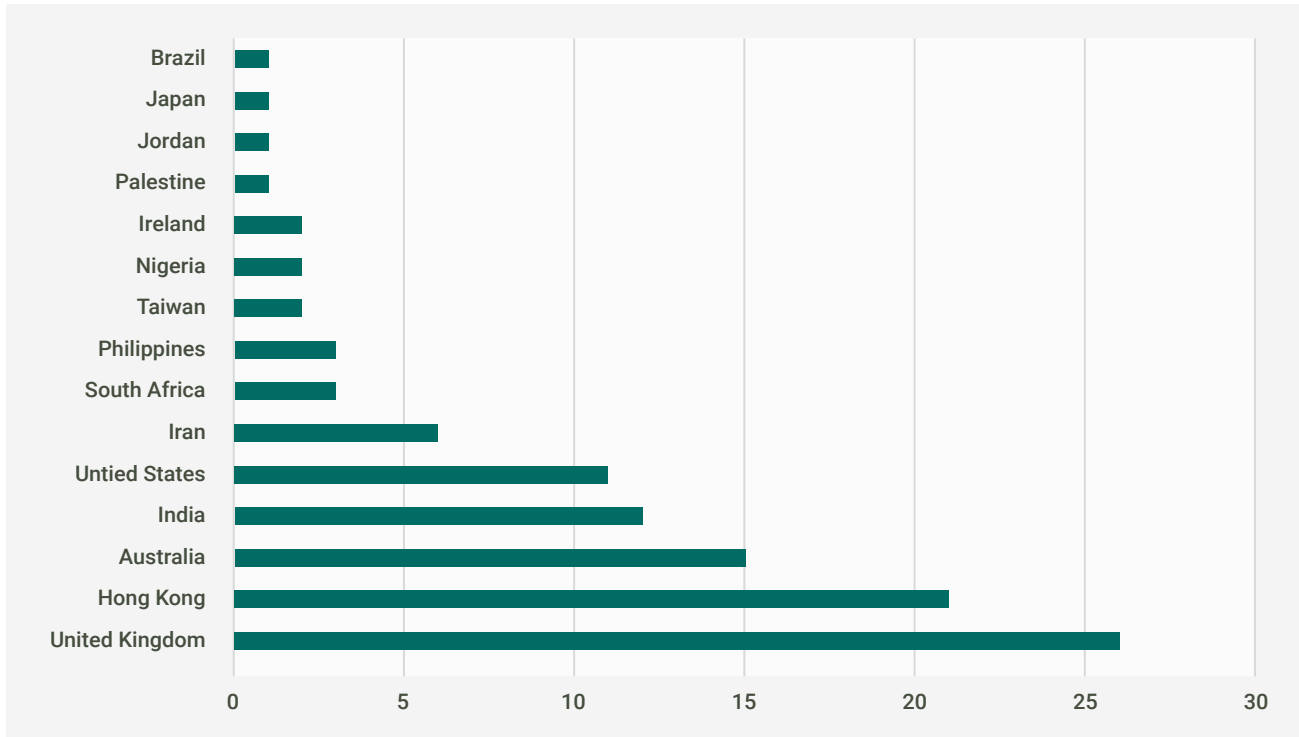
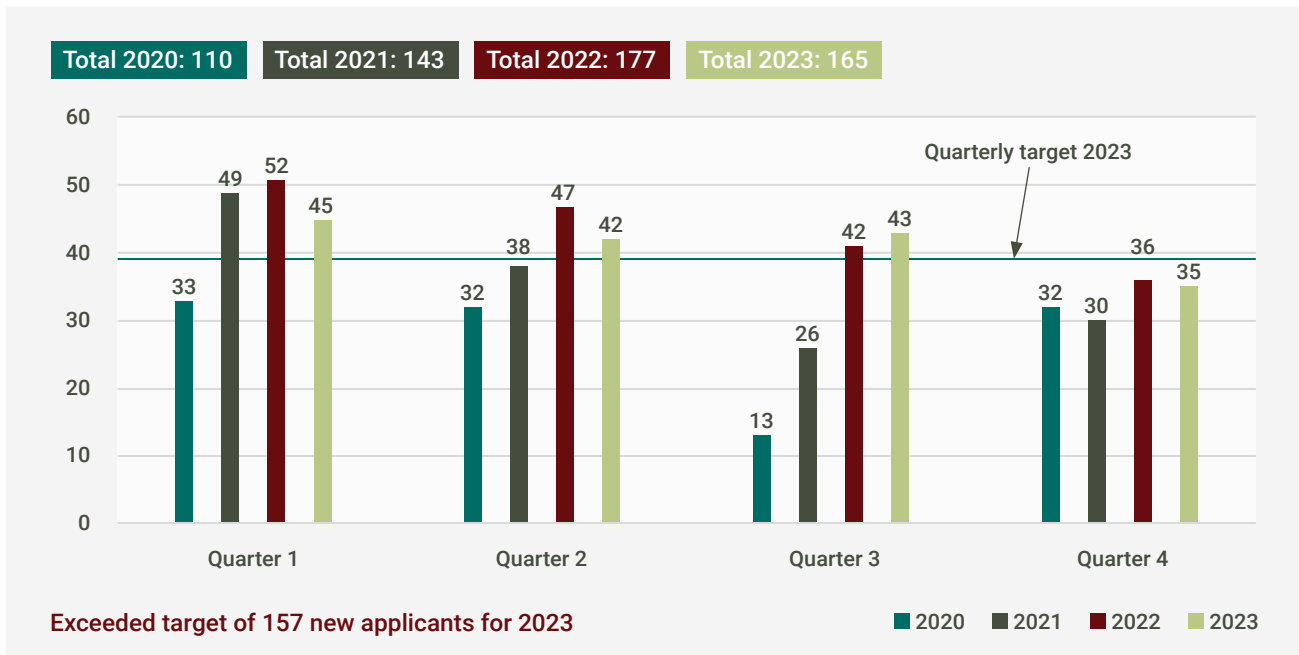


FIGURE 4: Number of New SEAS Applicants per Quarter, 2020–2023



ACTIVITIES IN 2023 CONTINUED

Truth and Reconciliation

ACOTRO is part of the national Occupational Therapy Truth and Reconciliation Task Force (OT TRC Task Force). On September 30, 2023, the National Day for Truth and Reconciliation, the OT TRC Task Force released the *Occupational Therapy Statement of Commitment to Indigenous Peoples in Canada*. The statement of commitment is intended to guide the reconciliation efforts of OT leadership organizations, to increase accountability to advance the Truth and Reconciliation Commission (TRC) of Canada Calls to Action and the Final Report on the National Inquiry into Missing and Murdered Indigenous Women and Girls Calls to Justice, and to support the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) within the occupational therapy profession.

“The OT TRC Task Force released the Occupational Therapy Statement of Commitment to Indigenous Peoples in Canada.”

Responding to the Calls to Action and recommendations within the TRC, National Inquiry, and UNDRIP, individually and collectively, is the responsibility of the occupational therapy profession at all levels (education, research, clinical, and regulatory) and presents an opportunity to translate the documents’ principles and values, human and occupational rights, and socially transformative approaches into practice.

Occupational Therapy Canada

ACOTRO members attended and assisted with the planning for the OT Reflection Day regarding volunteerism and leadership held during the CAOT conference on May 10.

Equity and Social Accountability

ACOTRO is also part of the development of a national joint position statement by OT organizations named *Towards Justice: Equity and Accountability in Occupational Therapy*. The position statement will focus on centring equity and committing to social accountability to support efforts towards social justice.

We work proactively together for public protection by advancing effective regulation of occupational therapists in Canada.





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