

ACOTRO

ASSOCIATION OF CANADIAN OCCUPATIONAL
THERAPY REGULATORY ORGANIZATIONS



ACORE

ASSOCIATION CANADIENNE DES ORGANISMES
DE RÉGLEMENTATION EN ERGOTHÉRAPIE

2021 Annual Report



Association of Canadian Occupational Therapy Regulatory Organizations
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PRESIDENT'S MESSAGE

This was a year for adapting to changes. Despite the ongoing pandemic and the resulting challenges for occupational therapists (OTs) across the country, ACOTRO continued to evolve and manage these challenges. I am heartened by the energy and accomplishments of our Board members as we worked together for public protection.

First, the *Competencies for Occupational Therapists in Canada* was formally released on December 1, 2021. ACOTRO worked hard with our partners, the Association of Canadian Occupational Therapy University Programs (ACOTUP) and the Canadian Association for Occupational Therapists (CAOT), to complete this work and distribute these competencies nationally. Our next steps will be to work together to implement these new competencies in Canada. We are proud of this accomplishment as it unifies the competencies for everyone, and moves forward the expectations for practice. Included in these new competencies is a focused section about Culture, Equity, and Justice. While there have been expectations about these principles in the past, they are now clearly outlined and focused so OTs will understand their applicability to practice.

We adjusted to the realities of the pandemic by delivering the entire program of the Substantial Equivalency Assessment System (SEAS), which assesses the education and competencies of internationally educated occupational therapists (IEOTs), remotely. We were able to work through the backlog of applicants created by the pandemic, and get back on track in the first part of the year. Our evaluation of this adapted delivery method shows that it continues to be a valid way to conduct these assessments. Applications from IEOTs did not slow down, despite the pandemic.

This year, we were pleased to present a refreshed website. With the assistance of funding from the Government of Canada, we were able to streamline and update our ACOTRO website to ensure that international applicants to the SEAS program, among other stakeholders, could easily access timely and accurate information.

We continue to work with our partners to ensure excellence in occupational therapy regulation. Critical activities for regulation such as the entry-to-practice examination as well as accreditation of occupational therapy programs have improved communication and organization to better help ACOTRO members meet their regulatory obligations. We look forward to continuing these activities.

We worked together to adapt to the changing realities of the nature of work, which have accelerated during the pandemic. OTs are using technology to connect with their clients now more than ever before. A focus this year has been addressing the regulatory parameters around the impact on occupational therapy practice that increasingly uses technology for client visits and for crossing provincial borders. We continue to move these dialogues forward.

I want to thank the ACOTRO Board for working collaboratively for the protection of the public and showing resilience in another year of pandemic challenges. I look forward to the possibilities that 2022 will bring.

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 and facilitate change in the regulatory environment.

ACOTRO also administers the assessment process for IEOTs. 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.

VISION

Courageous Unified Regulatory Leadership

MISSION

Working 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.
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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 representatives from each of our 10 provincial regulators.

ACOTRO MEMBERS 2021

President: Elinor Larney

Registrar, College of Occupational Therapists of Ontario

Vice-President: Kim Doyle (May–December)

Executive Director, Newfoundland and Labrador Occupational Therapy Board

Treasurer: Kevin Wong (May–December)

Registrar, College of Occupational Therapists of Nova Scotia

Heather Cutcliffe (Vice-President, January–May)

Registrar, Prince Edward Island College of Occupational Therapists

Sharon Eadie (Treasurer, January–May)

Executive Director, College of Occupational Therapists of Manitoba

Marianne Baird

CEO and Registrar, Alberta College of Occupational Therapists

Philippe Boudreau

Directeur général et secrétaire, Ordre des ergothérapeutes du Québec

Kathy Corbett

Registrar and CEO, College of Occupational Therapists of British Columbia

Sherry Just

Executive Director, Saskatchewan Society of Occupational Therapists

Natalie MacKenzie (July–December)

(Catherine Pente: January–July)

Registrar, New Brunswick Association of Occupational Therapists

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

STAFF

Susan Domanski, SEAS Manager

Suzanne Cunningham, SEAS Associate



ACTIVITIES IN 2021

ACOTRO members continued to adapt to the challenges brought about by the COVID-19 pandemic. Board members and staff collaborated to complete the initiatives set out in the current strategic plan. ACOTRO met with various stakeholders to achieve common goals and complete shared projects.

Strategic Plan Initiatives

ACOTRO members contributed to discussions and projects to increase the consistency of occupational therapy regulatory processes across Canada. Highlights included navigating the effects of the pandemic, addressing interjurisdictional telepractice, completing the new competencies document for OTs in Canada, updating the ACOTRO website, and participating in Truth and Reconciliation activities.

Presentations

- On February 10, Robin Adams, formerly of the College of Dental Hygienists of British Columbia, presented to the ACOTRO Board on “The History of Indigenous Peoples in Canada and Their Social Determinants of Health.”
- Andrea Bowden and Janetta Ozard from the College of Occupational Therapists of British Columbia presented to the ACOTRO Board on May 26 on their Indigenous Cultural Safety and Humility Project.
- On November 10, ACOTRO received a presentation from Canadian Institute for Health Information representatives Eric Pelletier, Lynn McNeely, Clara Pong, and Katie Burt about current initiatives, modernizing the collection of data from OTs across the country, and agreement updates.
- ACOTRO President Elinor Larney presented a summary of current ACOTRO initiatives to the regulatory body board chairs and presidents during a teleconference on November 25.

Website Refresh

ACOTRO Board members worked with SEAS staff and external companies to restructure, redesign, and update the content of the ACOTRO website to ensure current and accurate information for stakeholders and SEAS applicants in both French and English. Through this process, the security and responsiveness of the website were also improved.

Governance

Over the past year, the Governance Committee refreshed several existing governance policies to enhance ACOTRO’s organizational efficiencies and effectiveness. The Committee also developed a roles and responsibilities presentation to assist with governance education and succession management; this was presented to the ACOTRO Board. The risk management framework was further developed with a risk register.

Competencies for Occupational Therapists in Canada

By Elinor Larney, President of ACOTRO, Chair of CORECOM Steering Committee

ACOTRO was pleased to introduce the *Competencies for Occupational Therapists in Canada* in December 2021. This release was made possible by the collaborative efforts of ACOTRO, ACOTUP, and the CAOT, as well as by funding from the Government of Canada's Foreign Credential Recognition Program. While the government funding enabled the CORECOM Steering Committee to secure experts to assist with this work, each of the Steering Committee members contributed many hours on an in-kind basis. In addition, eight months into the work, the pandemic hit, forcing the Steering Committee and its panels of experts to forego any in-person meetings and to move to video conference technology. Despite this, the work was rewarding and successful, and the new competencies are the result.

The *Competencies for Occupational Therapists in Canada* are the first set of unified competencies for occupational therapy in Canada, and the document describes the process for their development. The competencies encompass six domains, each with a competency statement and corresponding indicators that describe how that competency is met. The context of practice is critical in applying the indicators, as not all indicators will be applicable in all practice settings.

The next step will be the implementation of these competencies within each sector across the country. Coordination of this work will be required for education and testing at the entry-to-practice level to be aligned with the new competencies. ACOTRO members will be implementing these competencies over the next few years. The implementation at the provincial level is specific to each province's regulatory infrastructure, so it may occur at different points in time. Educational materials will be available in 2022 to assist OTs to understand the impact of these new competencies on their practice.

The *Competencies for Occupational Therapists in Canada* can be accessed at <https://acotro-acore.org/wp-content/uploads/2021/11/OT-Competency-Document-EN-web.pdf>.

National eLearning Module

A steering committee, led by the College of Occupational Therapists of Ontario, was formed to develop a national eLearning module to inform and educate OTs about the new competencies, including an overview on the new sections on culture, equity, and justice, and professional responsibility. The eLearning module will be available to participating regulatory organizations for use as an online learning tool for individual registrants to increase their understanding and familiarity with the new competency document. Regulators may use this module as part of their quality assurance programs, their investigations and resolutions programs, and their registration programs for applicants re-entering the profession.



Consistent Re-Entry Framework

Re-entry is the process for confirming competency to return to practice following an absence from practice. A steering committee was formed to develop a re-entry program framework to harmonize re-entry practice requirements and ensure that key program elements are consistent with other ACOTRO regulatory endeavours. The new framework will be made available for adoption by ACOTRO members and include draft program policies and tools for program implementation. The committee has started comparing the current re-entry programs from provincial regulatory organizations and begun a review of research evidence to inform the development of the new framework.

Canadian Institute for Health Information (CIHI)

ACOTRO provides an efficient means for CIHI to connect with occupational therapy data providers.

Annual Data Provider Meeting

ACOTRO and the CAOT met with CIHI in February 2021. The Canadian occupational therapy regulators provide their provincial data to CIHI, while the CAOT reports data on those OTs who work in the territories, where professional regulation does not exist. The information populates the Occupational Therapy Database and the Health Workforce Database.

Minimum Data Set

CIHI is working to harmonize much of the information it collects from a variety of health professions. Work related to this initiative will occur over the coming years.

Data Services Agreement

ACOTRO contributed to a review of the agreement, which outlines the respective commitments of the data providers and CIHI.

CIHI Resources

CIHI has developed a number of resources which ACOTRO is using to guide its work, most notably the [Proposed Standards for Race-Based and Indigenous Identity Data Collection and Health Reporting in Canada](#).

Telepractice Memorandum of Understanding

ACOTRO is developing a memorandum of understanding for cross-jurisdictional virtual and telehealth services; a formal announcement will be made when this occurs.

The memorandum of understanding will address how each of the occupational therapy regulators relates to each other on regulatory matters that arise when an OT provides cross-jurisdiction virtual and/or telehealth services. This type of service delivery method was not contemplated when the legislation in the respective jurisdictions was enacted.

It is essential to remember that each province and territory in Canada has autonomy for health delivery legislation, including how it creates the legislation to regulate health professions.

National Exam Oversight

The National Occupational Therapy Certification Exam, administered by the CAOT, is a regulatory requirement for registration in 9 of the 10 Canadian jurisdictions.

The Exam Oversight Committee was established in 2017 to review and recommend policy for the Certification Exam Committee and National Occupational Therapy Certification Examination. The Exam Oversight Committee includes the registrar (executive director/CEO) of each provincial organization responsible for regulation and/or licensure, and the Certification Exam Committee chairperson or designate. Non-voting members consist of a CAOT Board appointee, one Certification Exam Committee member, and the CAOT CEO or designate (e.g., 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. Regulators are provided with the annual examination report as an additional component which assists the ACOTRO member organizations in meeting their statutory obligations related to the use of third-party entities.

The Exam Oversight Committee met five times in 2021 by teleconference to discuss and approve guidelines and policies related to the exam and its administration. A full review of the Certification Exam Committee's policies occurred. The committee approved the use of a hybrid approach for the exam without restrictions, allowing candidates to choose in-person testing centres or live remote proctoring. The CAOT has hired a consultant to help determine best practice guidelines and how to move forward with the exam using the new competencies for OTs in Canada.

SEAS: Substantial Equivalency Assessment System

SEAS is the first step in the assessment process for all IETs 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 and/or licensure in that jurisdiction. SEAS assesses the extent to which an IET'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;
- Language Readiness Assessment;
- Profession-Specific Credential Assessment;
- Jurisprudence Knowledge Assessment Test; and
- Competency Assessment (CA).

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 IETs 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.

SEAS is funded through applicant fees. Reporting to the ACOTRO Board, the SEAS Oversight Committee is responsible for supporting the SEAS manager, who has operational management of the program.

2021 Program Highlights

The number of IEOT applicants in 2021 increased to 143, compared with 110 in 2020, with applicant numbers exceeding the monthly forecast for the program.

Remote Delivery of CAs: The pandemic significantly impacted the SEAS program. 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. Clearing the backlog of CAs was the focus of the SEAS operations and oversight team for most of 2021. As of December 2021, the backlog was fully cleared.

Psychometric support for the evaluation of the shift to remote delivery revealed positive survey results from assessors and applicants. This supports remote delivery as a valid method to assess and demonstrate competency. It is anticipated that this will be the ongoing method of CA delivery.

Enterprise Systems Project: SEAS staff, with the assistance of a project consultant, reviewed options for securing a new online registration and payment system that can better manage the application process. Vendor demonstrations were provided, and the need for Canadian-based data storage was clarified. It is anticipated that vendor selection and implementation will occur early in 2022.

Gap-Filling Project: With funding from the BC Ministry of Jobs, Economic Recovery and Innovation, the College of Occupational Therapists of British Columbia completed a project to refine a decision-making framework and create a more effective matching of identified IEOT gaps to appropriate gap-filling options. Through a review of potential gap-filling resources, a suite of options was identified that could be suitable or adapted for IEOTs who need to fill gaps in knowledge, skills, or abilities. Areas where development of new gap-filling options are needed were also identified. Next steps are to move forward on expanding gap-filling options consistent with the framework.

Annual SEAS Update for Canadian Occupational Therapy Regulators: The Annual SEAS Update webinar was held on November 25 to provide provincial occupational therapy regulators and their registration committees and staff with an update on the program. This update focused on the shift to remote delivery of the CA and the plan for monitoring the impact of this change.

SEAS Applicant Statistics for January 1 to December 31, 2021

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 2021 was 131 (see Figure 2), up significantly from 25 in the previous year, and also up from 92 in 2019. Figure 3 lists the countries where the 131 IEOTs completed their occupational therapy education. Applicant numbers increased for 2021 (see Figure 4).

Figure 2: Number of Applicants Completing SEAS in 2021 and Intended Province of Practice

Intended Province of Practice	Number of Applicants
Unknown *	26
N/A (Failed SEAS)	13
British Columbia	42
Ontario	29
Alberta	10
Nova Scotia	5
Newfoundland	2
Manitoba	1
New Brunswick	1
Quebec **	1
Saskatchewan	1

* Gap-filling not complete or applicant not ready to register

** Completed SEAS and Quebec process at same time

Figure 3: Country of Occupational Therapy Education for Applicants Completing SEAS in 2021

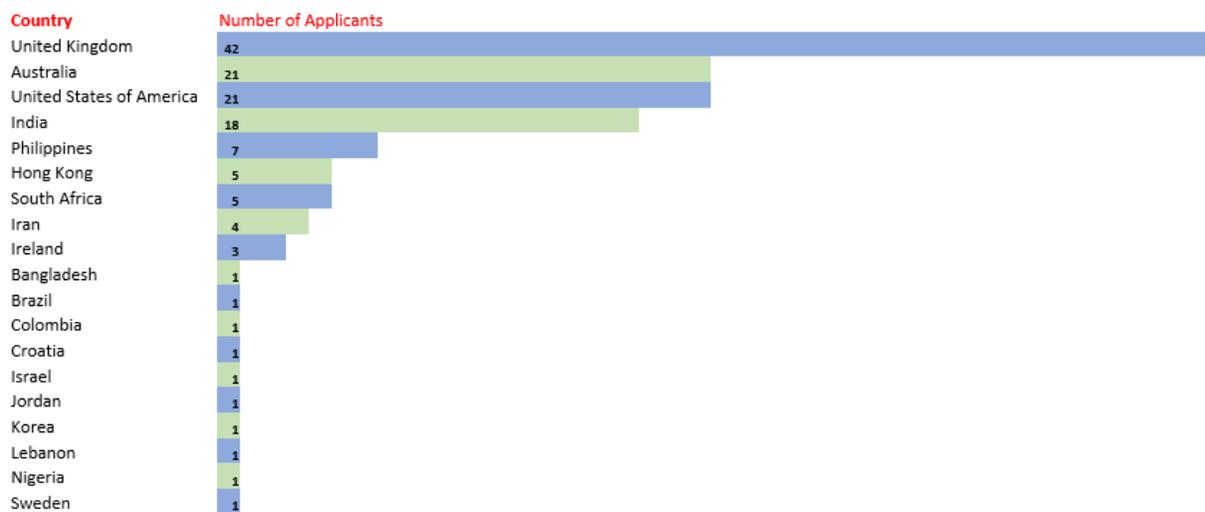
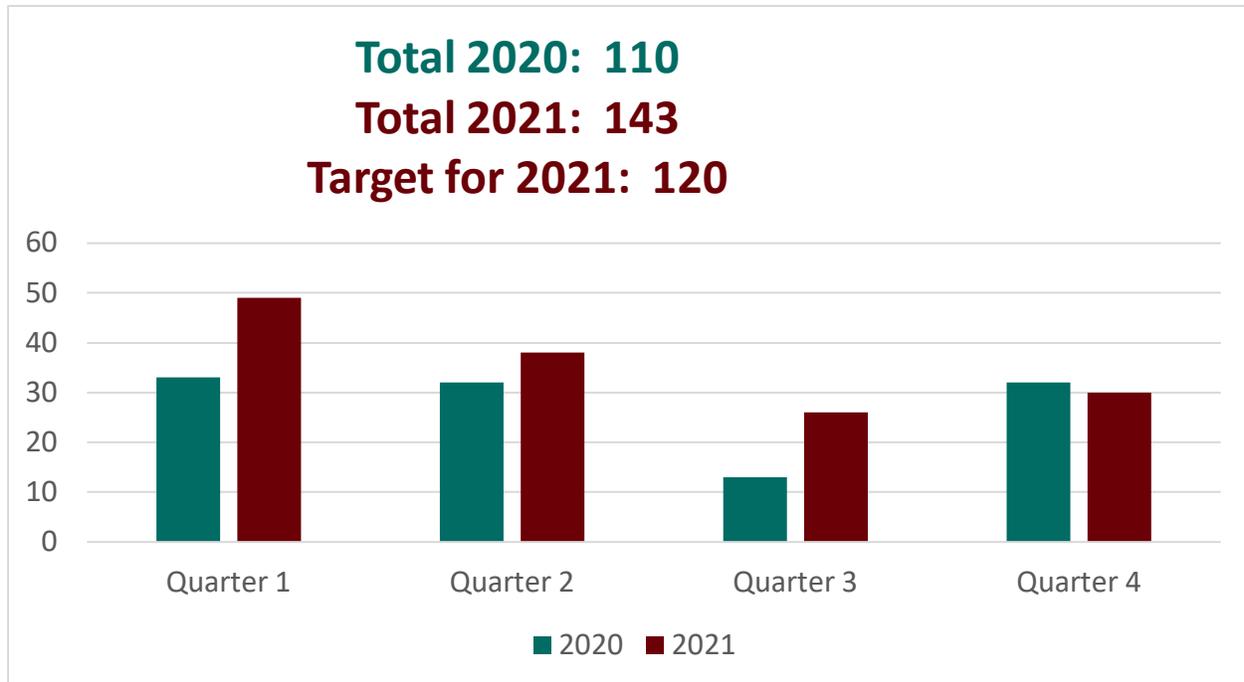


Figure 4: Number of New SEAS Applicants per Quarter in 2021 vs. 2020



OT Canada Reflection Day 2021

OT Canada Reflection Day was held virtually on June 22, with a focus on equity and justice. Representatives from ACOTRO, ACOTUP, the CAOT, the Canadian Occupational Therapy Foundation, and the Association of Canadian Occupational Therapy Professional Associations were in attendance. These were the objectives for Reflection Day:

1. To develop an understanding of how historical, social, political, and moral systems have led to inequality for certain individuals and advancement for other people including
 - a. how intersections of oppression and privilege are experienced; and
 - b. implications for occupational therapy education, research, and practice.
2. To identify core principles of equity and justice by
 - a. examining how systems of colonization affect occupational therapy organizations,
 - b. identifying recommendations to approach the work through decolonial and anti-racist lenses, and
 - c. identifying circles of influence for systemic change by individuals and organizations to promote equity and justice.
3. To outline commitments and actions as individual organizations and as a collective using coconstruction to address equity and justice in Canada.



Building Cultural Safety and Humility

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 (2018–2021) included the following:

- reviewing and revising regulatory processes to support Indigenous cultural safety and humility;
- participating in efforts regarding Truth and Reconciliation Commission (TRC) recommendations and Calls to Action, and recognizing that learning is essential to understanding the truth of the Indigenous experience and education about potential actions is paramount;
- influencing occupational therapy practice;
- providing regulatory leadership and perspectives to work with other partners;
- revisiting the TRC Calls to Action to confirm alignment of ACOTRO priorities; and
- integrating Indigenous cultural safety and humility into the CORECOM initiative.

Activities undertaken in 2021 included the following:

- providing education to members of the profession on the potential role of regulators through a discussion of one regulator's activities;
- joining the CAOT TRC Task Force, which is now known as the OT TRC Task Force to reflect the participation of ACOTRO, ACOTUP, the Canadian Occupational Therapy Foundation, and the Alliance of Canadian Occupational Therapy Professional Associations;
- planning and attending OT Canada Reflection Day;
- holding conversations about the collection and use of race-based and Indigenous-identity data (see CIHI Resources on p. 9);
- developing, through the CORECOM project, the *Competencies for Occupational Therapists in Canada, 2021*, which includes the domain of Culture, Equity, and Justice; and
- drafting a commitment statement to ensure that ACOTRO involvement is evident to the public, prospective OTs, and our partner organizations.

ACOTRO would like to acknowledge the generous support of the CAOT through their role in the OT TRC Task Force secretariat, which is essential to the efforts of this partnership.



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