



# **2024 ANNUAL REPORT**

# Association of Canadian Occupational Therapy Regulatory Organizations

20 Bay Street, Suite 900, PO Box 78 Toronto, ON, M5J 2N8

T. 1.844.700.5800

T. 416.681.1000

info@acotro.org www.acotro-acore.org



# TABLE OF CONTENTS

3	TERRITORIAL ACKNOWLEDGEMENT
4	PRESIDENT'S MESSAGE
5	WHO WE ARE
5	HISTORY, VISION, MISSION, VALUES
7	GOVERNANCE, ACOTRO MEMBERS 2024, STAFF AND CONTRACTORS
3	ACTIVITIES IN 2024:
9	Strategic Plan Initiatives
	Governance
	Consistent Re-Entry Framework
	National Exam Oversight
10	Presentations
11	Labour Mobility
	Cross-Jurisdictional Remote Practice Memorandum of Understanding
	Accreditation Governance Review
	Code of Ethics
	Competency, Quality, and Practice
12	SEAS: Substantial Equivalency Assessment System
16	Truth and Reconciliation
	Occupational Therapy Canada
	Canadian Institute for Health Information
	Equity and Social Accountability

18 CONTACT INFORMATION



# TERRITORIAL ACKNOWLEDGEMENT

The Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) respectfully acknowledges that the organization's staff, provincial members, and Board of Directors live, work, and play across the ancestral lands of many Indigenous Peoples.

ACOTRO's office, located in what is now known as Toronto, is situated on the Traditional Territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee, and the Wendat peoples. It is now home to many diverse First Nations, Inuit, and Métis Peoples. Toronto is covered by Treaty 13, which was signed with the Mississaugas of the Credit, and the Williams Treaties, signed with multiple Mississaugas and Chippewa First Nations.

We honour and acknowledge the First Nations, Inuit, and Métis, as the original stewards of the land, and we remind ourselves of our responsibility to be accountable for our actions toward connecting with and creating more equitable, inclusive, and respectful relationships with everyone who lives here. We are humbled as we reflect on and appreciate the land on which we are able to continue to gather and meet.





# PRESIDENT'S MESSAGE



As we reflect on another year of progress, I am reminded of the pivotal role we play in safeguarding public trust and ensuring the highest standards of service in occupational therapy practice. The commitment to

public protection is at the core of our work as regulators, and our ongoing collaboration assists us to uphold our duty to the public and others whom we serve.

In 2024, we successfully completed our strategic plan and, with renewed vision, began crafting a new plan for the years ahead—from 2025 through to the end of 2027. This next phase underscores our dedication to advancing public protection by strengthening collaboration among regulators and continuously refining the standards and systems we put in place to safeguard the well-being of Canadians.

We are proud of the significant strides we have made as a unified group of regulators. Our work with our national competencies and our oversight of the national exam ensures that only qualified and competent practitioners are granted the privilege to practise. Through these efforts, we continue to build regulatory systems that are robust, transparent, and fully aligned with our public protection mandate.

This year, we have also made valuable contributions to improving the governance of the accreditation of occupational therapy university programs. By participating in these efforts, we are helping to ensure that future practitioners are well-prepared to meet the high standards expected of them, which directly impacts the safety and quality of care provided to the public.

Beyond our regulatory responsibilities, we have continued to engage in important conversations around health human resources and other key topics with leadership groups across the occupational therapy sector. By bringing the regulatory lens to these discussions, we reinforce the importance of maintaining public safety and quality care in every aspect of the profession's development.

Our partnership with the Canadian Institute for Health Information (CIHI) to include socio-demographic data in our national data collection efforts represents another step toward improving the understanding of how our profession reflects the diverse population it serves. This is a crucial element in ensuring that we, as regulators, are responsive to the evolving needs of Canadian society and that we continue to protect the public through evidence-informed decision-making.

We have also worked collaboratively to establish a fair and consistent process for occupational therapists returning to practice after time away. This ensures that returning practitioners meet the necessary competencies to safely provide care to the public, reaffirming our commitment to public safety at every stage of a practitioner's career.

Additionally, we have made great progress in ensuring that regulation remains flexible and responsive to the changing landscape of occupational therapy practice. Our work on facilitating the registration of occupational therapists who provide remote services across multiple jurisdictions reflects our understanding of the need to support the evolving nature of health care delivery while continuing to prioritize public protection. While provincial regulations may vary, we have taken positive steps to ensure that the public remains protected as occupational therapists work across Canadian borders.

As we look ahead to 2025 and beyond, I am confident that our continued efforts will further strengthen the role of regulation in protecting the public, ensuring the safety, competence, and professionalism of occupational therapists across the country. The work we do together as regulators is essential to maintaining the integrity of our profession and the trust of the public we serve.

Thank you for your ongoing dedication to public protection and for the continued support of our shared mission.

Sincerely,

Elinor Larney
PRESIDENT, ACOTRO
Registrar and CEO, College of Occupational Therapists of Ontario



# WHO WE ARE

ACOTRO is the national organization representing provincial regulators of occupational therapy across Canada. We work together to ensure consistent, high-quality regulation of the profession from coast to coast.

ACOTRO's 10 provincial members are responsible for regulating the practice of occupational therapy within their respective jurisdictions. Collectively, we protect the public interest and provide direction to occupational therapists seeking information about registration in Canada.

Through ACOTRO, regulators collaborate to advance effective regulatory practices, enhance public accountability, and align approaches across provinces. This collective effort strengthens our ability to respond to evolving practices and regulatory requirements in the field of occupational therapy.

Our focus includes

- Advancing excellence in occupational therapy regulation
- Developing and advancing a national strategy for regulatory consistency

- Supporting interprovincial and international labour mobility for occupational therapists
- Fostering national and international networks and knowledge-sharing initiatives

These efforts help streamline regulatory processes and drive positive changes within the regulatory landscape.

ACOTRO also oversees and administers the assessment of internationally educated occupational therapists (IEOTs), evaluating whether their education and competencies are substantially equivalent to those of occupational therapists educated in Canada.

Each provincial regulatory organization designates one representative to serve on ACOTRO's Board, ensuring that every province contributes to national regulatory discussions and decisions (see Figure 1).





#### **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 interested third parties. 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 regulators in Canada are members of ACOTRO and take part in its initiatives. Governance is provided by a Board of Directors, made up of registrars or designated representatives from each of the 10 provincial regulatory bodies.

# **ACOTRO MEMBERS 2024**

**PRESIDENT: Elinor Larney** 

Registrar and 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 (until June 28)

Registrar, Ordre des ergothérapeutes du Québec

Yannick Chartrand (after June 28)

Deputy General Director and General Secretary, Ordre des ergothérapeutes du Québec

**Sherry Just** 

Executive Director and Registrar, Saskatchewan College of Occupational Therapists

**Natalie MacKenzie** 

Registrar, New Brunswick Association of Occupational Therapists

**Colleen MacPherson** 

Registrar, Prince Edward Island College of Occupational Therapists

Michelle Martin-Strong

Executive Director, College of Occupational Therapists of Manitoba

Carin Plischke (until June 27)

Registrar and CEO, College of Occupational Therapists of British Columbia

**Dianne Millette** (after June 27)

Registrar and CEO, College of Health and Care Professionals of British Columbia

On June 28, 2024, the College of Occupational Therapists of British Columbia amalgamated with six other colleges to form the College of Health and Care Professionals of British Columbia.

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

# STAFF & CONTRACTORS

Susan Domanski, MANAGER, SEAS PROGRAM

Vanilda Ferreira, SEAS ASSOCIATE / PROGRAM
COORDINATOR

Arianne De Guzman, SEAS ASSOCIATE

Rio Fe Umali, SEAS ASSOCIATE

Suzanne Cunningham, SEAS ADMINISTRATION SUPPORT



# ACTIVITIES IN 2024

ACOTRO members collaborated to navigate a range of challenges affecting occupational therapy regulation across the country. The organization also engaged with various external partners to achieve shared goals and bring joint initiatives to completion.



## **ACTIVITIES IN 2024**

#### **Strategic Plan Initiatives**

ACOTRO members took an active role in discussions and initiatives focused on improving the consistency of occupational therapy regulatory practices across Canada. Key areas of focus included addressing

challenges related to cross-jurisdictional remote practice, advancing the development of a re-entry framework, and participating in Truth and Reconciliation efforts.

#### Governance

Over the past year, the Governance Committee refreshed several existing policies following our three-year refresh cycle, as well as our code of conduct, bylaws, and employee handbook. The committee also added procedures for our risk register and for

French language translation, to enhance ACOTRO's organizational efficiencies and effectiveness.

The updated Substantial Equivalency Assessment System (SEAS) service agreements were sent for each provincial regulator's signature.

#### **Consistent Re-Entry Framework**

"Re-entry" refers to the process of evaluating an individual's competency to resume practice after a period of absence. Recognizing the need for greater alignment, ACOTRO members undertook a review of existing re-entry programs and committed to developing a consistent framework. This framework

aims to harmonize re-entry requirements and align key components with other ACOTRO regulatory initiatives. It will outline a clear process for applicants and include an assessment to evaluate their readiness to return to practice. Once piloted and finalized, the framework will be available for implementation by all ACOTRO members.

## **National Exam Oversight**

A core function of regulation is to establish and uphold entry-to-practice standards for the profession, which includes approving an examination to assess entry-level competence. The National Occupational Therapy Certification Examination (NOTCE), administered by the Canadian Association of Occupational Therapists (CAOT), serves as the approved exam and is a registration requirement in 9 of the 10 Canadian jurisdictions.

To oversee the exam process, the Exam Oversight Committee was formed in 2017. Its role is to review and recommend policies related to the administration of the NOTCE. The committee provides guidance to the Certification Exam Committee, which is responsible

for all aspects of the exam's development, delivery, validation, and related study materials.

The Exam Oversight Committee is composed of the registrar (executive director or CEO) from each provincial regulatory body, along with the chair or designate of the Certification Exam Committee. Non-voting members are a CAOT Board appointee, an additional Certification Exam Committee member, and the CAOT CEO or a designate (such as the director of standards). The committee is chaired by a representative from one of the provincial regulators (an ACOTRO member). In addition, one ACOTRO representative attends Certification Exam Committee business meetings to ensure that regulatory

continued on page 10



perspectives are reflected in key administrative decisions.

The Exam Oversight Committee convened five times via

teleconference in 2024 to carry out its responsibilities. That same year, the Examination Administration Agreements between provincial regulators and CAOT were updated and re-signed. The NOTCE continues to be delivered through a hybrid model, giving candidates the option to write the exam at in-person testing centres or through live remote proctoring. The exam was administered three times in 2024.

A new exam blueprint was developed by the Exam Blueprint Working Group, aligning the exam content with the Competencies for Occupational Therapists in Canada (2021). Efforts also progressed on developing additional exam questions that reflect the updated competencies. The new blueprint will be implemented starting with the September 2026 administration of the NOTCE. To accompany this update, a revised version of the NOTCE Resource Manual was created for candidates writing the exam on or after that date.

Each year, regulators receive a comprehensive exam report, which helps ACOTRO member organizations fulfill their regulatory responsibilities regarding oversight of third-party service providers, such as CAOT.



## **Presentations and Consultations**

#### **FEBRUARY 22**

Lynn McNeely and Katie Burt from CIHI presented to the ACOTRO Board on the newest data set, which also includes the collection of race-based data.

#### **APRIL 17**

Marissa McIntyre of Len Pierre Consulting provided education on Indigenous Cultural Safety and Humility through a webinar made available to all provincial occupational therapy regulatory boards and staff.

#### **APRIL 29**

Eva Habib of Len Pierre Consulting worked with the Board for a two-hour session to assist the Board with discussions about regulatory commitments and strategic planning as they relate to Truth and Reconciliation.

#### MAY 2

ACOTRO members presented at the CAOT conference on how complaints about registrants can serve as powerful catalysts for positive change within regulation and across the profession of occupational therapy. Complaint data trends and the data mappings to the *Competencies* 

for Occupational Therapists in Canada were shared as well as examples of how this information can be used by regulatory bodies and other organizations to make improvements for increasing public safety.

#### **SEPTEMBER 18 AND 20**

Glennie Mercer of Glennie Mercer & Associates facilitated strategic planning sessions with the ACOTRO Board to assist with the creation of a new strategic plan for 2025. ACOTRO's tagline, vision, mission, and values were reviewed, and revisions were discussed.

#### **NOVEMBER 27**

ACOTRO President Elinor Larney delivered a virtual presentation to the chairs and presidents of the provincial regulatory boards, providing an overview of ACOTRO's current initiatives and activities.

#### **DECEMBER 18**

Board members, staff, and registration committees from each ACOTRO member organization attended the annual SEAS update presentation, offering them the latest information and developments related to the program.



#### **Labour Mobility**

ACOTRO's provincial members maintain a Labour Mobility Support Agreement to meet the requirements of the Canadian Free Trade Agreement. The Labour Mobility Support Agreement outlines the conditions under which an occupational therapist licensed in one jurisdiction can obtain licensure in another province. In

2024, the agreement was updated and re-signed by all provincial regulatory organizations. Additionally, form templates used to implement labour mobility under the agreement were revised for use by the provincial occupational therapy regulators.

### **Cross-Jurisdictional Remote Practice Memorandum of Understanding**

In 2024, ACOTRO advanced its work on crossjurisdictional remote practice through continued dialogue and collaboration. The *Memorandum of Understanding for Cross-Jurisdictional Remote Practice in Occupational Therapy* was finalized and signed by ACOTRO members. This memorandum outlines the regulatory considerations and necessary actions when clients located in one province receive remote services from an occupational therapist licensed in another. Given the regulatory requirements and the variation in regulation of high-risk activities across Canada, such as controlled acts, or restricted activities, the agreement sets out these key difference and outlines significant regulatory obligations to ensure clarity and compliance in cross-provincial service delivery.

#### **Accreditation Governance Review**

In 2024, ACOTRO continued its involvement on a steering committee focused on the governance of occupational therapy accreditation. The committee, which includes representatives from CAOT and the Association of

Canadian Occupational Therapy University Programs, worked collaboratively to develop recommendations for a future governance model for accrediting entry-to-practice occupational therapy programs in Canada.

#### **Code of Ethics**

In 2024, ACOTRO members collaborated on the development of a template code of ethics. This initiative was undertaken to provide a foundational document that provincial occupational therapy regulators can tailor to their specific regulatory contexts and adopt as needed. The template aims to promote greater

consistency in ethical standards across jurisdictions while allowing for flexibility to address regional considerations. Once finalized, the code of ethics will be made available to all provincial regulators for further refinement and implementation.

## Competency, Quality, and Practice

In 2024, ACOTRO members continued their collaboration through the Competency, Quality, and Practice Working Group, a platform for exchanging resources, insights, and strategies to enhance continuing competence and quality assurance programs

across provinces. This collaboration reflects a shared commitment to learning together and advancing efforts to refresh and modernize regulatory practices, aligning them with the *Competencies for Occupational Therapists in Canada* and emerging best practices.



#### **SEAS: Substantial Equivalency Assessment System**

SEAS is the first step in the assessment process for all IEOTs seeking to register in any Canadian province outside of Quebec.<sup>1</sup> Operated by ACOTRO and used by 9 of the 10 provincial regulators, SEAS determines whether an applicant meets substantial equivalency requirements and is therefore eligible to apply for registration in their intended jurisdiction.

SEAS evaluates whether an IEOT's education and competencies are comparable to those of Canadian-educated occupational therapists. The program includes both qualification recognition and competence verification through the following components:

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

Funded through applicant fees, SEAS is overseen by the SEAS Oversight Committee, which reports directly to the ACOTRO Board. The program continues to monitor applicant trends that have emerged since the onset of the COVID-19 pandemic in 2020 and will maintain this focus through 2025.

#### **2024 PROGRAM HIGHLIGHTS**

#### **Remote Delivery of CAs**

The COVID-19 pandemic significantly impacted SEAS operations. In-person delivery of the CA—the only face-to-face component—was halted in March 2020. A remote delivery model was launched on November 16, 2020, and has since become a permanent feature. This transition has enabled applicants to complete the full SEAS program from anywhere in the world, eliminating barriers such as travel costs and visa requirements. In 2024, approximately 50% of SEAS applicants were residing outside Canada while completing the program.

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

Following the discontinuation of McMaster University's OT Practice Preparation Program in June 2022, ACOTRO partnered with the University of Alberta's Department of Occupational Therapy to develop a gap-filling course. This course, Critical Thinking, Clinical Reasoning and Application in Canadian Occupational Therapy, was offered twice in 2024—in the spring (March to May) and fall (September to December)—and enrolled a total of 35 IEOT participants. A course administration agreement is in place for the University of Alberta to deliver the program two to three times annually. Participant feedback has been consistently positive.

# Annual SEAS Update for Canadian Occupational Therapy Regulators

The Annual SEAS Update webinar took place on December 18, 2024, providing provincial occupational therapy regulators, along with their registration committees and staff, with the latest information about the program. The session highlighted trends, including the overall growth in SEAS applicant numbers over time, and outlined the strategy for monitoring the impacts of this increase.

# APPLICANT STATISTICS FOR JANUARY 1 TO DECEMBER 31, 2024

In 2024, SEAS received 177 IEOT applicants, up from 165 in 2023, exceeding both quarterly expectations and the annual forecast of 160. The program continued to observe growth in the number of applicants from countries where Canadian students often pursue their education abroad, such as Australia, the United Kingdom, and the United States, along with a continued rise in applicants from India. Figure 2 details the countries where these applicants completed their occupational therapy education. After steady growth in new applicants

continued on page 13

<sup>&</sup>lt;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. Occupational therapists are not regulated in the territories.



between 2021 and 2022, there was a slight dip in 2023, followed by another increase in 2024 (Figure 3).

Following the introduction of remote CA delivery on November 16, 2020, SEAS completion timelines have continued to improve. In 2024, a total of 106 IEOTs completed the SEAS process, a slight decrease from 107 in 2023.

In 2024, most SEAS applicants successfully achieved a determination of substantial equivalency, while others were directed toward additional education or were unsuccessful following their CAs. Figure 4 summarizes the final determinations for IEOTs who completed the SEAS process.

A small number of applicants, approximately 2% (2 individuals), failed their first attempt at the CA and did not proceed to a second attempt. An additional 5 applicants, representing 5% of completed files, failed

the CA twice and were unable to continue through the SEAS process.

For applicants who required further education, 22 individuals (21% of completed files) were referred to a gap-filling program at the University of Alberta. Another 17 applicants (16% of completed files) were directed toward alternative gap-filling resources.

The largest group of applicants, 60 individuals (56% of completed files), were determined to be substantially equivalent. These IEOTs demonstrated that their education and competencies aligned with Canadian occupational therapy standards, making them eligible to apply for registration without the need for additional training.

Figure 5 shows applicants' intended province of practice compared with the number of IEOTs each regulator registered as initial applicants in 2024.<sup>2</sup>

"Following the introduction of remote CA delivery on November 16, 2020, SEAS completion timelines have continued to improve. In 2024, a total of 106 IEOTs completed the SEAS process"

<sup>&</sup>lt;sup>2</sup>IEOTs initially registered in each province in 2024 may have completed SEAS prior to 2024. They may also have initially registered in more than one province. IEOTs transferring from one province to another province under the Labour Mobility Support Agreement are not included in these numbers.



FIGURE 2: Country of Occupational Therapy Education for SEAS Applicants in 2024

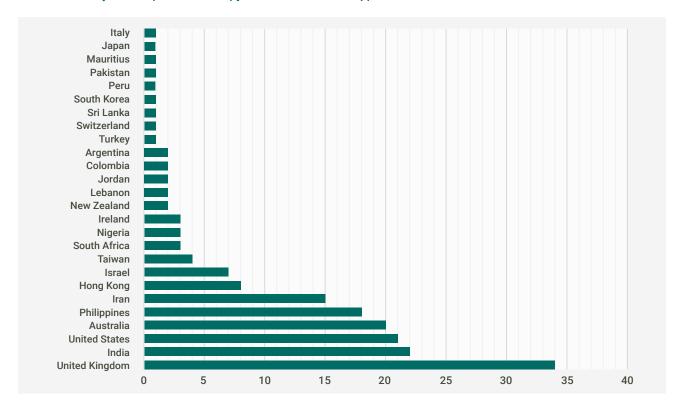


FIGURE 3: New SEAS Applicants per Quarter, 2021-2024

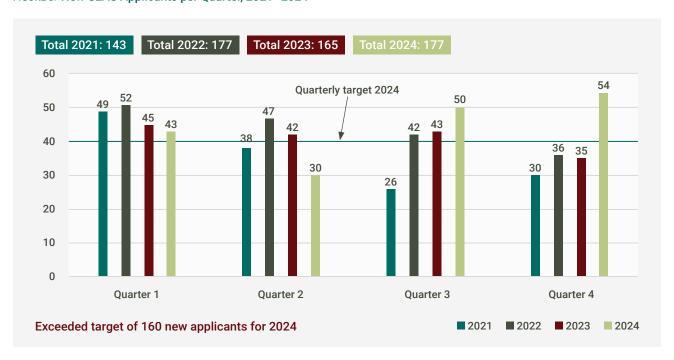




FIGURE 4: Final Determinations for Applicants Completing SEAS in 2024

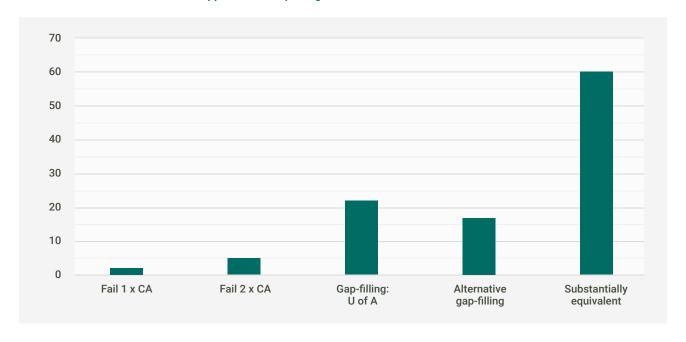
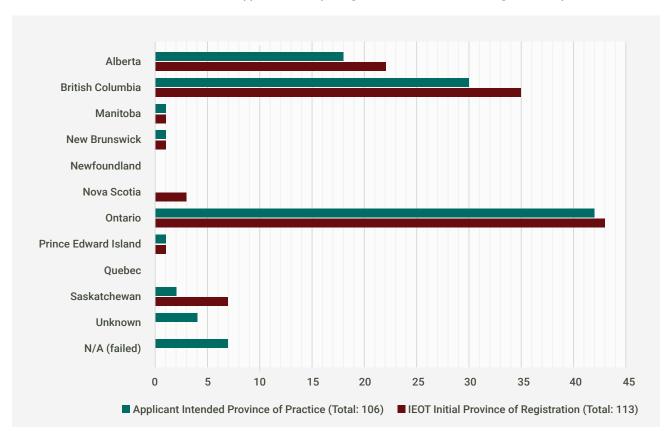


FIGURE 5: Intended Province of Practice of Applicants Completing SEAS in 2024 vs. Initial Registrations per Province





#### **Truth and Reconciliation**

Responding to the *Truth and Reconciliation*Commission of Canada: Calls to Action, the Calls to Justice in the Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls, and the United Nations Declaration on the Rights of Indigenous Peoples is a shared responsibility across all levels of the occupational therapy profession—including education, research, clinical practice, and regulation.

These foundational documents present an opportunity for the profession to apply their principles and values—such as human rights, occupational rights, and socially transformative approaches—in meaningful, practical ways.

In 2024, the ACOTRO Board engaged in reflective discussions informed by participation in education and dialogue centred on Indigenous Cultural Safety and Humility. As part of this ongoing commitment, the Board revisited the Occupational Therapy Statement of Commitment to Indigenous Peoples in Canada (2023), along with related resources, to assess progress and ensure that reconciliation-related initiatives are strategically aligned and actively pursued.

ACOTRO remains committed to advancing reconciliation through intentional, thoughtful actions that reflect both individual and collective accountability within the regulatory landscape.

#### **Occupational Therapy Canada**

ACOTRO members participated in and contributed to the planning of OT Reflection Day, held on May 1 during the CAOT conference. The event focused on exploring collaborative strategies to address occupational therapy workforce challenges across Canada.

#### Canadian Institute for Health Information

Provincial occupational therapy regulators provide registrant data to CIHI, while CAOT contributes data for occupational therapists practising in the territories, where occupational therapy regulatory bodies are not in place. These data are used to populate CIHI's Occupational Therapy Database and Health Workforce Database.

Throughout 2024, CIHI held several virtual meetings with data providers, including ACOTRO members, to support ongoing collaboration. CIHI also secured funding to assist provincial regulators in updating their database systems to align with a new, standardized data set. The updated data set is designed to enhance the comparability of health workforce data across provinces and professions. It also introduces the collection of race-based data to support equity-informed analysis and planning.

#### **Equity and Social Accountability**

ACOTRO contributed to the development of a national joint position statement by occupational therapy organizations titled *Toward Equity and Justice: Enacting an Intersectional Approach to Social Accountability in Occupational Therapy.* The statement emphasizes the importance of placing equity at the forefront and reinforces a collective commitment to social accountability as part of broader efforts to advance social justice within the profession.

In 2024, ACOTRO members initiated a collaborative effort to develop an eLearning module centred on promoting diversity and equity and fostering culturally safer practices in occupational therapy. The module is scheduled for release in 2025.







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