

**ACOTRO**

ASSOCIATION OF CANADIAN OCCUPATIONAL  
THERAPY REGULATORY ORGANIZATIONS



**ACORE**

ASSOCIATION CANADIENNE DES ORGANISMES  
DE RÉGLEMENTATION EN ERGOTHÉRAPIE

## 2022 Annual Report



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## PRESIDENT'S MESSAGE

This was another busy year for ACOTRO! It was a year filled with tremendous changes. Most importantly, we said farewell to several long-standing Board members. First, from British Columbia, Kathy Corbett announced her departure from the Board effective in December. A founding member of ACOTRO, Kathy was the president for many years and was an innovative and forward-thinking leader. She was not afraid to tackle big issues and lead change. Sharon Eadie, from Manitoba, another founding member, also announced her retirement. She will be missed by all and was the historian, who kept us grounded and ensured that our work was of high quality. And finally, Philippe Boudreau, from Quebec, departed from our Board in December. His intelligence and wit will be missed. However, in spite of all the goodbyes, we said hello to two new Board members and look forward to continuing our national collaborations.

Our most notable achievement was the development and deployment of our national e-learning module about the new *Competencies for Occupational Therapists in Canada*. This e-learning module was the first developed collaboratively by ACOTRO. It is fully electronic and available in both English and French—a true national collaboration. The feedback about this module has been tremendously positive, and it is an effective way to share information about the new competencies.

Our collaboration is ongoing. ACOTRO has been working on a memorandum of understanding between each of the regulatory organizations to outline how remote practice will be regulated. The details have been sorted out, and we hope to finalize this memorandum in the spring of 2023. The issue of practising across jurisdictions using remote technology has become more prominent, especially since the pandemic, and ACOTRO has responded to the need to clarify regulatory practices.

ACOTRO continues its work assessing internationally educated occupational therapists (IEOTs). In 2022, a new partnership was formed with the University of Alberta to develop and deliver a gap-filling course for any IEOT who needs additional training prior to becoming registered in Canada. We are pleased to work with the university and have had terrific results from the first course delivered. We have great confidence that those who successfully participate in this course will contribute to safe and effective practice.

We continue to work with our national partner, the Canadian Association of Occupational Therapists (CAOT), to provide oversight for the entry-to-practice exam, the National Occupational Therapy Certification Exam (NOTCE). This collaboration brings confidence in the exam process and its value to support safe and effective occupational therapy practice. The work to integrate the new competencies into all facets of occupational therapy is ongoing, and ACOTRO continues to contribute to forums, including ones related to the exam, where this work is underway.

ACOTRO is involved in several other collaborative activities that are underway but not yet complete: a review of the governance of the accreditation of occupational therapy university programs, a review of the data that are collected about occupational therapists, and a review of re-entry programs nationally. Many of these university and re-entry programs contribute to the supply of occupational therapists. Noting that the country as a whole continues to require competent health care practitioners helps us to appropriately prioritize work that contributes positively to the workforce.



It is exciting to see all this collaboration to ensure that the public receives safe, consistent, and effective care. Thank you to all my colleagues across Canada who have committed to our shared vision of courageous, unified regulatory leadership.

**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 occupational therapists (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

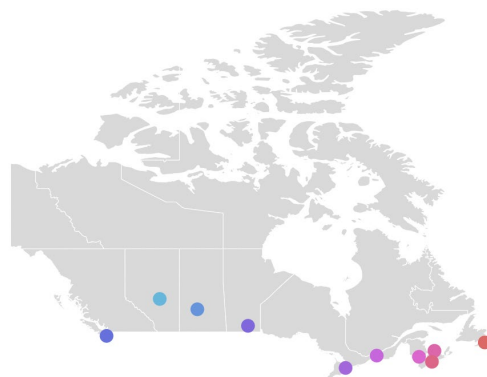
- advancing best practices in occupational therapy regulation,
- developing and promoting a national strategy for consistent regulatory practices,
- promoting interprovincial and international labour mobility among OTs, and
- strengthening national and international networking and information-sharing.

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.

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## VISION

Courageous Unified Regulatory Leadership

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## MISSION

We work proactively 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 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 ACOTRO representatives from each of our 10 provincial regulators.

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### ACOTRO MEMBERS 2022

**President: Elinor Larney**

*Registrar, College of Occupational Therapists of Ontario*

**Vice-President: Kim Doyle**

*Executive Director, Newfoundland and Labrador Occupational Therapy Board*

**Treasurer: Kevin Wong**

*Registrar, College of Occupational Therapists of Nova Scotia*

**Marianne Baird**

*CEO and Registrar, Alberta College of Occupational Therapists*

**Philippe Boudreau**

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

**Kathy Corbett / Carin Plischke**

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

**Heather Cutcliffe / Colleen MacPherson**

*Registrar, Prince Edward Island College of Occupational Therapists*

**Sharon Eadie / Michelle Martin-Strong**

*Executive Director, College of Occupational Therapists of Manitoba*

**Sherry Just**

*Executive Director, Saskatchewan Society of Occupational Therapists*

**Natalie MacKenzie**

*Registrar, New Brunswick Association of Occupational Therapists*

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

**Suzanne Cunningham**, SEAS Associate

**Vanilda Ferreira**, SEAS Associate



## ACTIVITIES IN 2022

ACOTRO members continued to collaborate and navigate the various challenges affecting the regulation of occupational therapy across the country. ACOTRO met with various interested third parties to achieve common goals and complete shared projects.

### Strategic Plan Initiatives

ACOTRO completed strategic planning sessions at the February 8–10 Board meeting and started work on the new initiatives. ACOTRO members contributed to discussions and projects to increase the consistency of occupational therapy regulatory processes across Canada. Highlights included navigating the continuing effects of the pandemic, addressing cross-jurisdictional remote practice, completing the e-learning module related to the new competencies for OTs in Canada, working on a re-entry framework, and participating in Truth and Reconciliation activities.

### Presentations

- On March 6, ACOTRO members presented on the topics of telepractice (cross-jurisdictional remote practice), the new competencies, and the national e-learning module at the CAOT conference.
- On November 21, Leandri Engelbrecht, interim manager of Investigations and Resolutions at the College of Occupational Therapists of Ontario, provided the ACOTRO Board with a presentation about the ACOTRO e-learning module on the new competencies.
- Lesley Krempulec, manager of Quality Assurance at the College of Occupational Therapists of Ontario, presented to the Board on November 21 about the College's self-assessment and professional development plan.
- On November 29, ACOTRO President Elinor Larney gave a virtual presentation to the regulatory board chairs and presidents to summarize current ACOTRO initiatives.

### Governance

Over the past year, the Governance Committee refreshed several existing policies, to enhance ACOTRO's organizational efficiencies and effectiveness. Terms of reference were developed for the new combined Communications and Knowledge Management System Committee. The Governance Committee also developed orientation checklists for mentors and mentees to assist with succession management. The risk register format was refined, and the register content was validated and updated. Information from the Board's self-evaluation activity was analyzed and compared with the results from a prior self-evaluation, with improvements evident in many areas.





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

Re-entry is the process of confirming competency to return to practice following an absence from practice. A steering committee was formed in late 2021 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. Once developed, the new framework will be made available for adoption by ACOTRO members and include draft program policies and tools for program implementation. The committee continues to work on this project, with an anticipated completion date in 2023.

### **Canadian Institute for Health Information (CIHI)**

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

ACOTRO and the CAOT met with CIHI on November 9. 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 for OTs does not exist. The information populates the Occupational Therapy Database and the Health Workforce Database.

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

In 2022, ACOTRO continued to work on developing a memorandum of understanding for cross-jurisdictional remote practice. The memorandum will address how the occupational therapy regulators relate to each other on regulatory matters that arise when an OT provides services remotely in other provinces. This type of service delivery method was not contemplated when the legislation in the respective jurisdictions was enacted. Importantly, each province and territory in Canada has autonomy for health delivery legislation, including the method of creating legislation to regulate health professions.

### **National Exam Oversight**

The NOTCE, 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 NOTCE. The Exam Oversight Committee includes the registrar (executive director or CEO) of each provincial organization responsible for regulation and 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 (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.

The Exam Oversight Committee met four times in 2022 by teleconference to discuss and approve guidelines and policies related to the exam and its administration. 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 will be offered three times per year starting in 2023. An Exam Blueprint Working Group has been established to develop a new exam blueprint that maps to the new occupational therapy 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, CAOT).

### **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;
- Language Readiness Assessment;
- Profession-Specific Credential Assessment;
- Jurisprudence Knowledge Assessment Test (JKAT); and
- 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 2023.

### **2022 Program Highlights**

The number of IEOT applicants in 2022 increased to 177, compared with 143 in 2021, with applicant numbers exceeding the monthly forecast 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. For most of 2021, the SEAS operations and oversight team focused on clearing the backlog created during the time needed to shift delivery models. As of December 2022, the CA pandemic backlog was fully caught up; however, a new backlog is starting to form due to the continued

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<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.

growth in the number of applicants. Additional assessors are being brought on board to address this growth.

**Critical Thinking, Clinical Reasoning and Application in Canadian Occupational Therapy Course:** In June 2022, McMaster University discontinued its OT Practice Preparation (OTEpp) 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 pilot online OT Process course was successfully run with 12 IEOTs through the university's Continuing Professional Education unit in the summer of 2022. A second cohort of 16 IEOTs were referred to the November 2022 offering of the course, scheduled to finish in February 2023. 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.

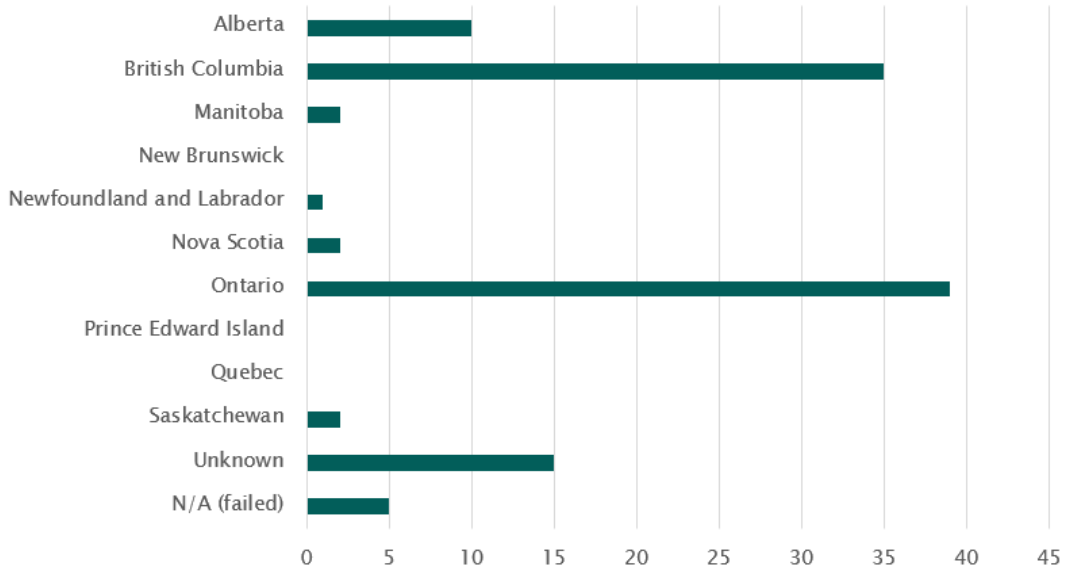
**COTBC-Sponsored JKAT Project:** The College of Occupational Therapists of BC (COTBC) secured project funding to support two aspects of SEAS: item analysis and item development to maintain the JKAT. Seventy-eight JKAT items have been updated and validated through pilot testing and key validation with subject matter experts. A further 48 new JKAT items have been developed and validated, also through pilot testing and key validation. Next steps include preparing the online test forms, completing a standard-setting focus group, establishing cut-score data for approval by ACOTRO, and updating the JKAT online learning module.

**Annual SEAS Update for Canadian Occupational Therapy Regulators:** The Annual SEAS Update webinar was held on January 19, 2022, 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.

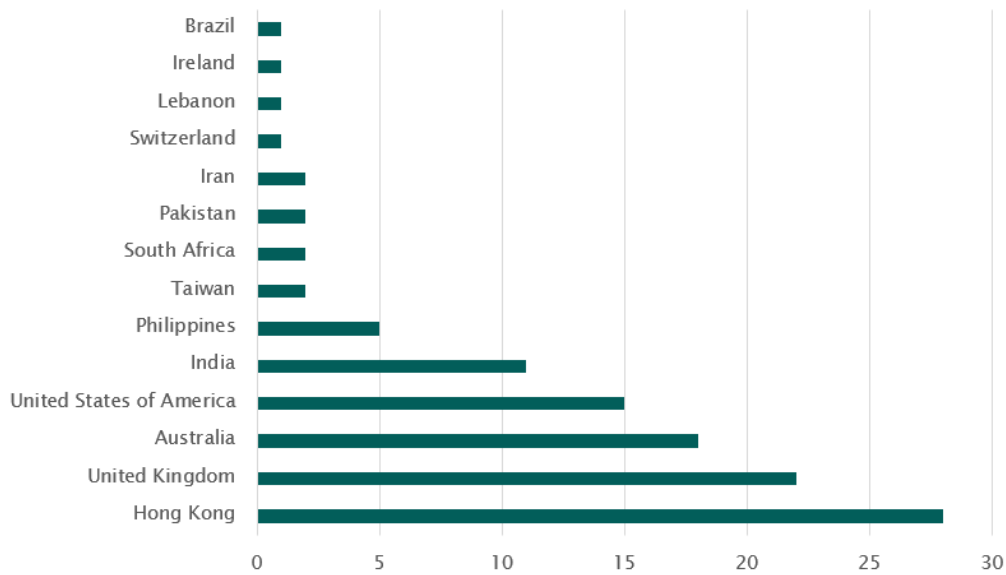
#### ***Applicant Statistics for January 1 to December 31, 2022***

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 2022 was 111 (Figure 2), down from 131 in 2021, when a backlog from the pandemic was being addressed. Figure 3 lists the countries where the 111 IEOTs completed their occupational therapy education. The program did see fewer applicants in 2022 from countries where Canadians typically complete their international occupational therapy education (Australia, the United Kingdom, and the USA) and an increase in the number of applicants from Hong Kong. Applicant numbers increased for 2021 and 2022 (see Figure 4).

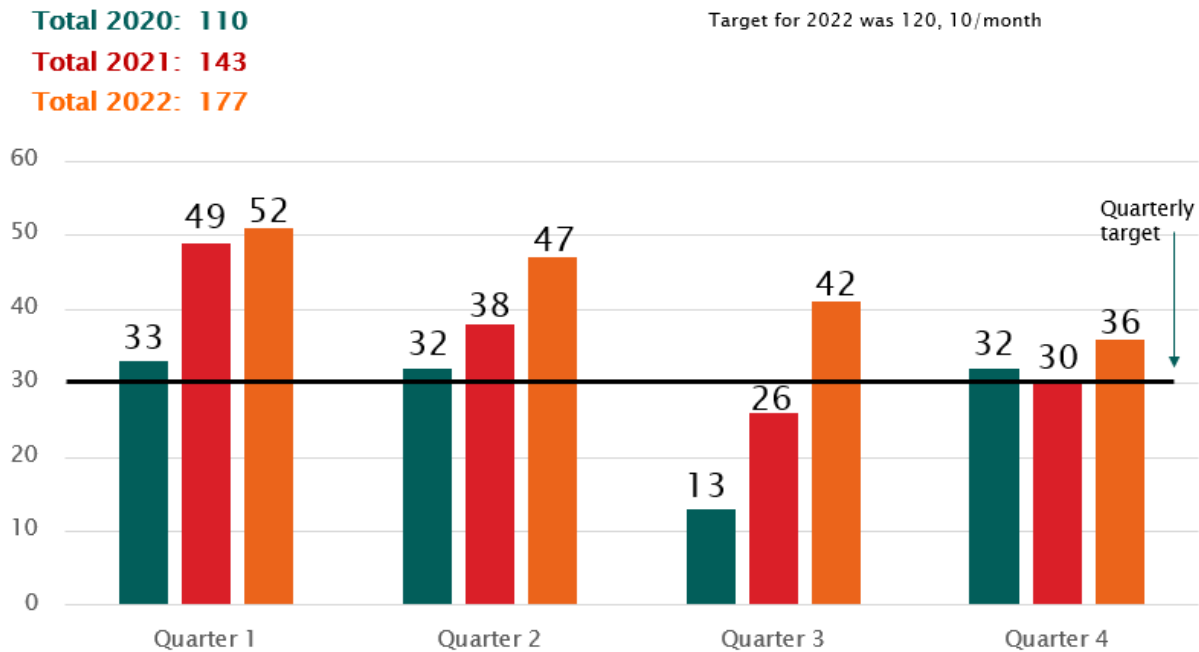
**Figure 2: Number of Applicants Completing SEAS in 2022 and Intended Province of Practice**



**Figure 3: Country of Occupational Therapy Education for Applicants Completing SEAS in 2022**



**Figure 4:** Number of New SEAS Applicants per Quarter, 2020–2022



### OT Canada Reflection Day 2022

OT Canada Reflection Day was held virtually on June 15, with a focus on equity and justice. Representatives from ACOTRO, the Association of Canadian Occupational Therapy University Programs, the CAOT, the Canadian Occupational Therapy Foundation, and the Association of Canadian Occupational Therapy Professional Associations attended. These were the objectives for Reflection Day:

- recognize what is at stake for under-represented occupational therapists and clients in this pivotal global moment, and
- introduce an intersectional approach to social accountability as a frame for organization-level equity initiatives.

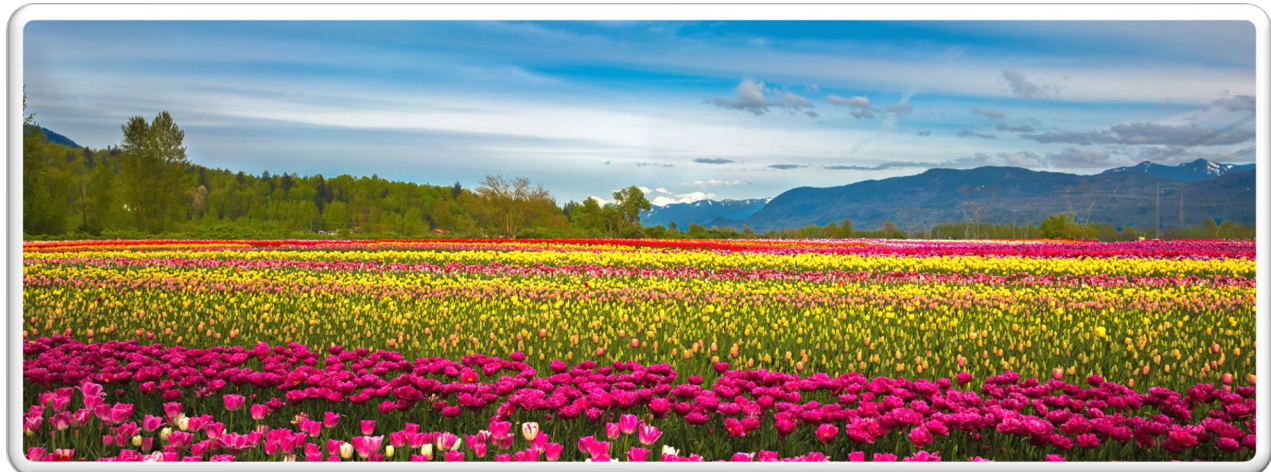
### Building Cultural Safety and Humility

The ACOTRO Board’s strategic priorities include promoting systemic changes through influence and participation. Hence, ACOTRO has created the following goals: establish principles and strategies to integrate Indigenous cultural safety into ACOTRO as an organization and influence member regulatory organizations and interested third parties to do the same, and establish principles and strategies to integrate culture, equity, anti-oppression, and justice into ACOTRO’s work and regulatory role.



Activities undertaken in 2022 included the following:

- ACOTRO representatives attended a full-day session of the OT TRC Task Force. The session emphasized the commitments of the task force and the national organizations that join together as task force participants.
- ACOTRO posted a commitment statement on its website to ensure that our involvement in building cultural safety and humility is evident to the public, prospective OTs, and our partner organizations.



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