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Nova Scotia College of Optometrists

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Fair Registration Practices Act (FRPA)  
Review Report  
March 11, 2022

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Province of Nova Scotia

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## EXECUTIVE SUMMARY

The Nova Scotia College of Optometrists (NSCO) is specifically named in the *Fair Registration Practices Act* (FRPA or “the Act”) as a “regulating body” that is subject to the Act. Section 6 of the Act summarizes the “Duty” of each “regulating body”, including NSCO, as follows:

### *Duty of regulating body*

**6** *A regulating body has a duty to carry out registration practices that are transparent, objective, impartial and procedurally fair.*

The Review Officer, appointed under Section 13 of the Act and under the authority provided for under Sections 14 and 16 of the Act, facilitated a FRPA Review, which was initiated on May 18, 2021 and resulted in this final report. The purpose of this FRPA Review at the outset was:

- 1) To determine the current compliance status with the FRPA and, in particular, the fulfillment of above quoted “Duty” of a regulating body”; and
- 2) If areas of non-compliance are identified, to facilitate a path back to compliance through the requirement to develop an Action plan containing specific actions and completion dates as well as the requirement of progress reports on that Action plan until compliance is achieved.

The current compliance status was determined based on NSCO’s responses to 12 review questions. Based on these responses, 3 areas of non-compliance were identified. Consequently, NSCO prepared an Action Plan (Appendix A of this report). As noted in the Action plan, two of these three compliance areas have since been brought into compliance. The third area relates to training for those responsible for internal reviews of registration decisions rendered by NSCO. As noted in the Action plan, NSCO is actively working to bring this area into compliance.

These review questions, responses, areas of non-compliance identified and corresponding actions and timelines to address them are detailed in this report.

A progress update on this Action Plan (Appendix A) from the NSCO is required by January 28, 2023. It is anticipated that NSCO will be in compliance by this date. This progress report will be posted to the FRPA website <https://novascotia.ca/lae/fair-registration-practices/>

The collaboration and cooperation of the Nova Scotia College of Optometrists throughout this review process is gratefully acknowledged.

Sincerely,

A handwritten signature in blue ink, appearing to read "F. Reinhardt". The signature is fluid and cursive, with the first letter of the first name being a large, stylized "F".

Frank Reinhardt  
Review Officer, Fair Registration Practices Act (FRPA)

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# I: INTRODUCTION

## 1.1. THE FAIR REGISTRATION PRACTICES ACT

[The Fair Registration Practices Act](#) (FRPA; the Act) applies to 47 [regulatory bodies](#) in Nova Scotia, covering over 59 occupations and 21 designated trades. A regulatory body (regulatory authority or regulator) sets the standards and regulates how people practice as members of an occupation. Everyone who practices within a regulated occupation must register with the regulatory body.

The FRPA mandates that regulating bodies carry out registration practices that are transparent, objective, impartial and procedurally fair. Section 16(2) of the FRPA states: “Every regulating body shall review its registration practices in accordance with this Section and shall file a report on the results of the review with the Review Officer for the reporting period.” This review process is to occur as per the Act and if items are deemed to be noncompliant with the FRPA, an Action Plan is required to be completed by the Regulatory Body. The intent of the Action Plan is to identify how the items of noncompliance are progressing to ensure compliance, fairness, and transparency, as required by the Act.

## 1.2. OVERVIEW OF THE REGULATING BODY

<b>Name of Regulating Body:</b>	Nova Scotia College of Optometrists
<b>Review Questions Due:</b>	2021-09-23
<b>Date Submitted:</b>	2021-09-23
<b>Name and contact for the review submitter:</b>	Name: Sandra Williams Phone: 902-434-8810 Email: <a href="mailto:info@nsco.ca">info@nsco.ca</a>

### OVERVIEW OF REGULATOR:

An optometrist is an independent primary health care provider who specializes in the examination, diagnosis, treatment, management, and prevention of diseases and disorders of the vision system, the eye and associated structures as well as the diagnosis of related systemic conditions.

There are more than one hundred and fifty Doctors of Optometry widely distributed in communities throughout Nova Scotia, providing eye health care to the public. Optometrists

examine, diagnose, measure and treat conditions of the eye by any method other than surgery. Optometrists prescribe, fit and apply glasses, contact lenses or other devices to correct, relieve or treat the eye. Other procedures or therapies may be prescribed to monitor and improve vision or eye health. Patients are referred to other health care practitioners as required.

Doctors of Optometry complete a four year professional degree in Optometry and Vision Science, usually after completing a Bachelor's degree in Science. Many Doctors of Optometry complete optional Residency and Fellowship programs as well.

### **Organizational Description**

Optometrists who practice in Nova Scotia are licensed by the Nova Scotia College of Optometrists (NSCO). Through the Optometry Act of Nova Scotia ([Optometry Act](#)), the province has given the Nova Scotia College of Optometrists the responsibility to govern its affairs and safeguard the public interest.

The College has two fundamental mandates that it exercises to protect the public:

- it licenses Optometrists, and
- it regulates and maintains standards of professional practice and conduct for the optometry profession in Nova Scotia.

### **Active Membership Requirements**

To be an active member of the NSCO, applicants must meet the registration and renewal requirements for licensure as an Optometrist in Nova Scotia. Registered members must also stay current in both practice hours and continuing education hours as required by the Board and take part in Practice Assessment audit(s) when/if required.

### **Registration Requirements**

All individuals wanting to practice optometry in Nova Scotia must meet the requirements for registration and licensing with the Nova Scotia College of Optometrists. The requirements for registration are set out in the Optometry Act and its Regulations, primarily (but not solely) in the *Registration and Licensing Regulation*, s. 3

#### *Eligibility for Registration*

- 3 To be eligible for registrations, an applicant must meet all of the following qualifications:
  - (a) the applicant must successfully complete 1 or more examinations by an examining body approved by the Board;
  - (b) the applicant must successfully complete the OEBC or its equivalent;

- (c) the applicant [must] possess the professional liability insurance required by Section 33; and
- (d) the applicant must pass a test of language proficiency in French or English.

### **CFTA Transfers**

Applicants applying under the Agreement on Internal Trade (AIT), now the Canadian Free Trade Agreement (CFTA), are required to show they are in good standing in the jurisdiction they are practicing as well as those jurisdictions they may have previously practiced.

### **International Applicants**

Registration of an International candidate starts with the Federation of Optometric Regulatory Authorities of Canada (FORAC). FORAC is the national voice of optometric regulatory bodies in the 10 provinces and 3 territories. Internationally educated optometrists or eye care professionals seeking registration to practice optometry in any Canadian Province or Territory (except Quebec), must have their credentials assessed by FORAC. Applicants used to undergo a Bridging Program through the University of Waterloo but this will be replaced by a new program. It will be, the Advanced Standing Optometry Preparatory Program (ASOPP). ASOPP provides an education pathway for individuals who have completed optometry training outside of North America and who wish to obtain a license to practice in Canada. This newly redesigned bridging program is scheduled to begin in April 2022. ASOPP is designed to ensure advanced standing students will be prepared to join the 3<sup>rd</sup> year Doctor of Optometry program. Students who successfully complete all aspects of ASOPP and years 3 and 4 of the Doctor of Optometry program will be awarded a Doctor of Optometry degree from the University of Waterloo.

### **Organizational Structure and Staffing**

The NSCO Board consists of 6 Directors elected from the membership by secret ballot held in conjunction with its annual meeting and two Directors who are appointed by the province to be the public members on the Board. Board members serve for a term of three years and shall not serve for more than three consecutive terms. The NSCO has three part-time staff members, an Executive Director, Administrator and Accountant. In addition to the Board there are standing committees such as, Registration, Complaints, Hearing, Legislation, Mediation and Practice Enhancement.

### **Types of Licenses/Certificates Issued**

The NSCO only grants practicing licenses to those applicants who meet all requirements for licensure. In September 2021, the NSCO had 154 licensed optometrists.

## II: QUANTITATIVE DATA

Quantitative data is collected from regulating bodies each year by way of a data survey. The following is a copy of the information provided by the *Nova Scotia College of Optometrists*, covering the year 2021, in fulfillment of the quantitative reporting requirements under Section 15 of the FRPA.

<b>Total Practicing Members:</b>	156
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<b>Applications Received*:</b>				
	Successful	Unsuccessful	In Progress	Total*
New	8	0	0	9
Interprovincial	1	0	0	1
International	2	0	0	2

\*May include "In Progress" Applications from previous year(s) as well as withdrawn applications. Therefore, the total may not equal the sum of "successful", "unsuccessful" and currently "In Progress" applications.

## III: ANALYSIS OF REGISTRATION PRACTICES

As per Section 16 of the Act, the registration practices of a regulating body must be reviewed, and a public report produced. The FRPA Program works with regulatory bodies to assess the registration practices against the compliance criteria and develop an Action Plan to help each organization comply with the Act and improve registration practices, if applicable.

The *Nova Scotia College of Optometrists* responses to the FRPA Review Survey are detailed below, along with the review findings determined by the Review Officer in accordance with the Act.

## SECTION I: INFORMATION AND REGISTRATION PROCEDURES

This section asks questions about all practices and policies your organization may use to provide information to the applicant during the registration process. The registration process includes the actions required to be taken by individual applicants, and any documentation required to be submitted which will be used to assess the applicant’s request for registration. Documentation examples could include transcripts, certificates, job descriptions, articles, letters of support, and evaluations. All communication to and from the applicant should be clear and understandable to all individuals, including those who may have received their qualifications outside of Canada.

### QUESTION 1

Explain, in detail, the requirements for registration. Requirements include: 1) qualifications; 2) a list of the documentation an applicant must submit; and 3) the registration process and how requirements are met – from start to final decision. If there are steps (such as an exam or experience requirement) that take place as a part of the registration process, please include. Also, explain how this information is communicated to applicants. Include a link(s) to information published in the public domain.

Alignment with the FRPA: Section 7(c), 9(a), 16(3)(a), (b), (e) and (g)

**RESPONDENT ANSWER** Use the chart provided to identify each type of license issued. In each column next to the license type, identify the qualifications, documentation required, a step-by-step overview of the registration process, and communication of information.

LICENSE TYPE	QUALIFICATIONS (LIST)	DOCUMENTATION (LIST)	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)
<ul style="list-style-type: none"> <li>Practicing</li> </ul>	<ul style="list-style-type: none"> <li>graduated from a recognized school of optometry and have successfully passed the national exam (OEBC)</li> </ul>	<ul style="list-style-type: none"> <li>Recent headshot photo-notarized</li> <li>Proof of Canadian citizenship – notarized birth certificate or citizenship papers.</li> </ul>	<ul style="list-style-type: none"> <li>Successfully graduate from an ACOE school of Optometry</li> <li>Successfully pass the National OEBC exam (both written and practical portions.)</li> <li>Visit the NSCO website <a href="http://www.nSCO.ca">www.nSCO.ca</a>.</li> </ul> <p>Complete the application</p> <p>Upload all supporting documents</p>	<ul style="list-style-type: none"> <li>Under the Registration process on our website, it states that throughout the process that the college will communicate in detail with the candidate confirming when requirements are met and/or are still outstanding at each step.</li> </ul>

			<p>If applicable, notarized copy of certificate showing permanent residence status</p> <p>If applicable, authorization under the Immigration Act (Canada) to engage in the practice of optometry- notarized copy of authorization</p> <p>Certified copies of all Academic transcripts in support of all degrees and qualifications</p> <p>Proof of successful completion of the OEBC national exam</p>	<p>Pay the registration and jurisprudence exam fee</p> <p>Once application and documents have been reviewed by the college Registrar, applicant sent study material for jurisprudence exam. The study materials consist of the Optometry Act, Regulations, Standards of Practice and By-Laws</p> <p>When candidate ready to write exam, it is emailed to them. They have 10 days to complete it.</p> <p>When completed exam received, sent to the Registrar for correction.</p> <p>Candidate successfully passes jurisprudence exam, they are notified in writing and sent link for license application.</p> <p>License application completed and fees received, applicant is licensed.</p> <p>Requirements are met when all of the required documents are received, and amounts paid</p> <p><a href="#">New Graduate</a></p>	<p>It states to allow 5 Business days before contacting the college. In the instructions for the various types of applications, (new graduate, international etc.) it states that the candidate will be notified when their application has been sent to the Registrar, the timeline for the jurisprudence exam to be corrected and the review policy should an application be unsuccessful</p>
<p><b>COMPLIANCE CRITERIA</b></p>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides information about its registration practices in a clear and understandable form; and</li> <li>• The regulating body explains the qualifications required for registration; and</li> <li>• The regulating body identifies documentation of qualifications that must accompany an application; and</li> <li>• The regulating body explains the registration process and how requirements for registration are to be met; and</li> <li>• The regulating body explains how information is communicated; and</li> <li>• The regulating body provides information in a publicly accessible manner; and</li> <li>• The regulating body provides copies of blank application forms for registration in a publicly accessible manner.</li> </ul>				

	<p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not provide information about its registration practices in a clear and understandable form; or</li> <li>• The regulating body does not explain the qualifications required for registration; or</li> <li>• The regulating body does not identify documentation of qualifications that must accompany an application; or</li> <li>• The regulating body does not explain the registration process and how requirements for registration are to be met; or</li> <li>• The regulating body does not explain how information is communicated; or</li> <li>• The regulating body does not provide information in a publicly accessible manner; or</li> <li>• The regulating body does not provide copies of blank application forms for registration in a publicly accessible manner.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p> <p>The requirements for registration are well explained including qualifications, documentation, process, and communication. Links to online forms are included.</p>

## QUESTION 2

Do you have a registration process for applicants who have international qualifications? If so, describe the process and include a list of the documentation an applicant must submit. How is information on the registration process communicated to applicants with international qualifications? Include a link(s) to information published in the public domain.

Alignment with the FRPA: *Section 7(c), 9(a) and 16(3)(b), (e), (g)*

**RESPONDENT ANSWER**

Use the chart provided to identify each type of license issued. In each column next to the license type, identify the documentation required, a step-by-step overview of the registration process, and how information is communicated.

LICENSE TYPE	DOCUMENTATION (LIST)	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)
<ul style="list-style-type: none"> <li>• Practicing license</li> </ul>	<p>Recent headshot photo- notarized</p> <p>Proof of Canadian citizenship – notarized birth certificate or citizenship papers.</p> <p>If applicable, notarized copy of certificate showing permanent residence status</p> <p>If applicable, authorization under the Immigration Act (Canada) to engage in the practice of optometry-notarized copy of authorization</p> <p>Certified copies of all Academic transcripts in support</p>	<p>Contact the Federation of Optometric Regulatory Authorities of Canada (FORAC) <a href="http://forac-faroc.ca">http://forac-faroc.ca</a> . FORAC is responsible for the credential assessment of candidates. The detailed steps and guide to the process are found there.</p> <p>If an international candidate’s education was not completed in English then, it would be assessed by FORAC. The competencies are listed on their website, <a href="http://forac-faroc.ca">http://forac-faroc.ca</a> .</p> <p>Complete the International Optometric Bridging Program (IOBP) at the University of Waterloo. Details about the program may be found at, <a href="https://uwaterloo.ca/international-optometric-bridging-program">https://uwaterloo.ca/international-optometric-bridging-program</a>.</p> <p><b><i>Please note: this program at Waterloo has been discontinued and its replacement is not expected until spring 2022</i></b></p> <p>Successful completion of the Optometry Examining Board of Canada (OEBC) national exam</p> <p>Information about the exam may be found at, <a href="http://www.oebc.ca/">http://www.oebc.ca/</a>.</p> <p><b><i>Please note, only when you have successfully completed the international optometric bridging program through the University of Waterloo and have successfully passed the OEBC will you be considered as a candidate for licensure in Nova Scotia.</i></b></p> <ul style="list-style-type: none"> <li>• All of the steps listed below may be completed online prior to arriving in Nova Scotia.</li> <li>• Visit the NSCO website <a href="http://www.nSCO.ca">www.nSCO.ca</a>. Complete the application Upload all supporting documents</li> </ul> <p>Pay the registration and jurisprudence exam fee</p> <p>Once application and documents have been reviewed by the college Registrar, applicant sent study material for jurisprudence exam.</p>	<ul style="list-style-type: none"> <li>• Under the Registration process on our website, it states that throughout the process the college will communicate in detail with the candidate confirming when requirements are met and/or are still outstanding at each step.</li> </ul> <p>It states to allow 5 Business days before contacting the college. In the instructions for the various types of applications, (new graduate, international etc.) it states that the candidate will be notified when their application has been sent to the registrar, the timeline for the jurisprudence exam to be corrected and the</p>

		<p>of all degrees and qualifications proof of successful completion of the OEBC national exam</p>	<p>When candidate ready to write exam, exam is emailed to them. They have 10 days to complete it.</p> <p>When completed exam received, sent to the Registrar for correction. Candidate successfully passes jurisprudence exam, notified and sent link for license application.</p> <p>License application completed and fees receive, applicant is licensed.</p> <p>Requirements are met when all of the documents are received, and amounts paid <a href="#">International Candidate</a></p>	<p>review policy should an application be unsuccessful.</p>
<p>If you do not have a process, please explain.</p>				
<p><b>COMPLIANCE CRITERIA</b></p>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides information about its registration practices in a clear and understandable form to individuals who received their qualifications outside Canada; and</li> <li>• The regulating body identifies documentation of qualifications that must accompany an application; and</li> <li>• The regulating body explains the registration process and how requirements for registration are to be met; and</li> <li>• The regulating body explains how information is communicated; and</li> <li>• The regulating body provides information in a publicly accessible manner; and</li> <li>• The regulating body provides copies of blank application forms for registration in a publicly accessible manner.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not provide information about its registration practices in a clear and understandable form to individuals who received their qualifications outside Canada; or</li> <li>• The regulating body does not identify documentation of qualifications that must accompany an application; or</li> <li>• The regulating body does not explain the registration process and how requirements for registration are to be met; or</li> <li>• The regulating body does not explain how information is communicated; or</li> <li>• The regulating body does not provide information in a publicly accessible manner; or</li> <li>• The regulating body does not provide copies of blank application forms for registration in a publicly accessible manner.</li> </ul>			

<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p> <p>The requirements for registration are well explained including qualifications, documentation, process, and communication. Links to online forms are included.</p>

### QUESTION 3

Do you have a registration process for applicants who are registered/licensed in another jurisdiction in Canada (CFTA transfers)? If so, describe the process and include a list of the documentation an applicant must submit. How is information on the registration process communicated to applicants who are CFTA transfers? Include a link(s) to information published in the public domain.

Alignment with FRPA: *Sections 3, 7(c), 9(a) and 16(3)(b), (e), (g)*

**CFTA transfers:** applicants who are currently registered/licensed in another jurisdiction in Canada, in accordance with the Canadian Free Trade Agreement (CFTA).

<b>RESPONDENT ANSWER</b>	<p><b>Use the chart provided to identify each type of license issued. In each column next to the license type, identify the documentation required, a step-by-step overview of the registration process, and how information is communicated.</b></p>			
	<b>LICENSE TYPE</b>	<b>DOCUMENTATION (LIST)</b>	<b>REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)</b>	<b>COMMUNICATION OF INFORMATION (DESCRIBE &amp; ADD ANY RELEVANT LINKS)</b>
	<ul style="list-style-type: none"> <li>Practicing License</li> </ul>	<ul style="list-style-type: none"> <li>Recent headshot photo- notarized</li> <li>Proof of Canadian citizenship – notarized birth certificate or citizenship papers.</li> </ul>	<ul style="list-style-type: none"> <li>Visit the NSCO website <a href="http://www.nSCO.ca">www.nSCO.ca</a>.</li> <li>Complete the application</li> </ul>	<p>Under the Registration process on our website, it states that throughout the process the college will communicate in detail with the candidate confirming when requirements</p>

		<p>If applicable, notarized copy of certificate showing permanent residence status.</p> <p>If applicable, authorization under the Immigration Act (Canada) to engage in the practice of optometry-notarized copy of authorization.</p> <p>Certified copies of all Academic transcripts in support of all degrees and qualifications</p> <p>Proof of successful completion of the OEBC national exam</p>	<p>Upload all supporting documents</p> <p>Pay the registration and jurisprudence exam fee</p> <p>Once application and documents have been reviewed by the college Registrar, applicant sent study material for jurisprudence exam.</p> <p>When candidate ready to write exam, exam is emailed to them. They have 10 days to complete it.</p> <p>When completed exam received, sent to the Registrar for correction.</p> <p>Candidate successfully passes jurisprudence exam, notified and sent link for license application.</p> <p>License application completed and fees receive, applicant is licensed.</p> <p>Requirements are met when all of the documents are received, and amounts paid</p> <p><a href="#">CFTA</a></p>	<p>are met and/or are still outstanding at each step. It states to allow 5 Business days before contacting the college. In the instructions for the various types of applications, (new graduate, international etc.) it states that the candidate will be notified when their application has been sent to the registrar, the timeline for the jurisprudence exam to be corrected and the review policy should an application be unsuccessful</p>
<p><b>COMPLIANCE CRITERIA</b></p>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body has a streamlined process to license applicants certified in another Canadian jurisdiction that regulates the same occupation; and</li> <li>• The regulating body identifies documentation of qualifications that must accompany an application; and</li> <li>• The regulating body explains the registration process and how requirements for registration are to be met; and</li> <li>• The regulating body explains how information is communicated; and</li> <li>• The regulating body provides information in a publicly accessible manner; and</li> <li>• The regulating body provides copies of blank application forms for registration in a publicly accessible manner.</li> </ul> <p><b>Not compliant:</b></p>			

	<ul style="list-style-type: none"> <li>• The regulating body does not have a streamlined process to license applicants certified in another Canadian jurisdiction that regulates the same occupation; or</li> <li>• The regulating body has additional material requirements that must accompany an application; or</li> <li>• The regulating body does not explain the registration process and how requirements for registration are to be met; or</li> <li>• The regulating body does not explain how information is communicated; or</li> <li>• The regulating body does not provide information in a publicly accessible manner; or</li> <li>• The regulating body does not provide copies of blank application forms for registration in a publicly accessible manner.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p> <p>Based on this answer, there is no streamlined process to license applicants certified in another Canadian jurisdiction. The process identifies that in addition to requiring the same official documentation as required of a new applicant, CFTA applicants are asked to provide Certificate of Standing forms. Official documentation that has already been assessed in another jurisdiction is an additional material requirement that negates a streamlined application process. It is permissible to ask for evidence of good standing in the jurisdiction where the applicant is <i>currently</i> licensed and registration should be based on this alone (a jurisprudence exam is okay to include). The application form should be amended to reference the CFTA rather than the AIT. To be compliant with the FRPA, a streamlined process aligned with requirements of the CFTA is required to license applicants certified in another Canadian jurisdiction.</p>

#### QUESTION 4

Do you charge a fee for the registration process? If so, describe the fee and explain how this information is communicated to applicants. Include a link to information published in the public domain. If there is a third-party process with associated fees, please explain. Provide a link to any published information.

Alignment with the FRPA: *Section 7(f) and 16(3)(d)*

**RESPONDENT ANSWER**

Yes

No

	Describe and explain: The information is listed on the application form, \$300 application fee and \$200 for the jurisprudence exam. <a href="https://nsco.in1touch.org/client/subscription/subscriptionEdit.html?productId=7192">https://nsco.in1touch.org/client/subscription/subscriptionEdit.html?productId=7192</a>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides information setting out any fees for registration in a clear and understandable form; and</li> <li>• The regulating body describes the fees even if they are not applicable or are \$0; and</li> <li>• The regulating body provides information about fees in a publicly accessible manner.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not provide information setting out any fees for registration in a clear and understandable form; or</li> <li>• The regulating body does not describe the fees even if they are not applicable or are \$0; or</li> <li>• The regulating body does not provide information about fees in a publicly accessible manner.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p> <p><i>Improvement: In addition to the application form, post information about fees on the website to facilitate public accessibility and transparent registration practices.</i></p>

**QUESTION 5**

When documentation cannot be obtained by an applicant for reasons beyond their control, do you advise the applicant about what alternative documentation could be supplied that may be acceptable to the regulating body? (Example: a sworn statement in lieu of full documentation.) If so, explain. How is this information communicated to applicants? Provide a link to information published in the public domain.

Alignment with the FRPA: *Sections 7, 9 and 16(3)(c)*

**RESPONDENT ANSWER**

Yes

No

If yes, please explain:

This information is listed on our website, under each type of registration pathway. **“The NSCO recognizes that there may be circumstances where and applicant may not be able to provide certain required documents. Please consult our policy concerning accepting. Alternative Information”**

An applicant who cannot provide some or all required documentation should contact the NSCO Registrar in writing to request that the NSCO accept alternative information. The request should include the documents he/she/they are unable to be provided, the reasons why and the attempts made to retrieve the documents. When the Registrar accepts that the required documents cannot be provided, the NSCO will consider some of the following alternative information sources for assessing an applicant’s educational credentials: certified copies of original academic documents, photocopies along with an affidavit attesting to authenticity, info obtained by the NSCO from third parties, or any other information offered by the applicant evidencing their academic qualifications. Some acceptable alternative documents to assess prior experience are:

Reference letters from prior employees and colleagues, statements of professional standing from other regulatory bodies and certified copies of professional licenses/certificates. The complete lists are contained in the policy. **Please note, the applicant is responsible for the costs of alternative assessments.**

**COMPLIANCE CRITERIA**

**Compliant:**

- The regulating body provides clear and understandable information with respect to acceptable alternative documentation; and
- The regulating body advises applicants on what alternative information may be supplied when they cannot obtain documentation for reasons beyond their control; and
- The regulating body provides information about acceptable alternative documentation in a publicly accessible manner.

**Not compliant:**

- The regulating body does not provide clear and understandable information with respect to acceptable alternative documentation; or
- The regulating body does not advise applicants on what alternative information may be supplied when they cannot obtain documentation for reasons beyond their control; or

	<ul style="list-style-type: none"> <li>The regulating body does not provide information about acceptable alternative documentation in a publicly accessible manner.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p>

#### QUESTION 6

Do you provide any support to applicants during the registration process? If so, describe the type of support provided. (Examples: contact information, explanation of registration requirements, translation services, etc.). How is information about supports communicated to applicants? Provide a link to information published in the public domain.

Alignment with the FRPA: *Sections 7(e) and 16(3)(k)*

#### RESPONDENT ANSWER

- Yes
- No

**If yes, describe:** Our contact information is listed on our website and any inquiry is responded to within 2 business days. It is also stated within the Timeline section communication to applicant.

Students can begin the application process in their final semester of school. They may begin to fill out the application and upload the required documents as received. Their application will not be considered complete until all required documents and fees are received. Throughout the process, the College will communicate in detail with applicants confirming when requirements are met and/or are still outstanding at each step.

[Contact Us](#) [Timeline](#)

<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides support to the applicant during the registration process; and</li> <li>• The regulating body describes the type of support provided to the applicant during the registration process; and</li> <li>• The regulating body provides information about the type of support provided to applicants during the registration process in a publicly accessible manner.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not provide support to the applicant during the registration process; or</li> <li>• The regulating body does not describe the type of support provided to the applicant during the registration process; or</li> <li>• The regulating body does not provide information about the type of support provided to applicants during the registration process in a publicly accessible manner.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p>

### QUESTION 7

Do you have a description of existing accommodation practices for applicants with a physical or mental disability? If so, describe how an applicant would request an accommodation and how requests are considered. How do you make this process available to applicants in a transparent, objective, impartial and procedurally fair manner? Include a link to information published in the public domain.

Alignment with the FRPA: *Section 6, 16(3)(h)*

Reference: [Human Rights Act \(nslegislature.ca\)](http://www.nslegislature.ca)

<b>RESPONDENT ANSWER</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <b>If yes, describe:</b>  Our process is completed solely online including our jurisprudence exam. The study documents for the exam are sent to the candidate and only when they are ready to write it, is it sent to them. The exam is open book format, and the applicants have 10 days to complete it. If they required, an extension to the 10 days, would be accommodated.
<b>COMPLIANCE CRITERIA</b>	<b>Compliant:</b> <ul style="list-style-type: none"> <li>• The regulating body has a description of existing accommodation practices for applicants with a physical or mental disability; and</li> <li>• The regulating body has a clear process for applicants to request an accommodation and understand how requests will be considered; and</li> <li>• The regulating body provides a description of accommodation practices in a publicly accessible manner.</li> </ul> <b>Not compliant:</b> <ul style="list-style-type: none"> <li>• The regulating body does not have a description of existing accommodation practices for applicants with a physical or mental disability; or</li> <li>• The regulating body does not have a clear process for applicants to request accommodation and understand how requests will be considered; or</li> <li>• The regulating body does not provide a description of accommodation practices in a publicly accessible manner.</li> </ul>
<b>REVIEW FINDINGS</b>	<b>To be completed by the FRPA Review Officer:</b>  <input type="checkbox"/> Compliant  <input checked="" type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Officer:</b>  An applicant could require accommodation at any point in the registration process. It is difficult to come up with every reason why a person might make this request. A regulating body cannot withhold or limit access to membership on account of physical disability or mental disability (Human Rights Act (nslegislature.ca)). The description required by the FRPA should focus on procedural fairness and include information on accommodation procedures including how an applicant would request an accommodation during the registration process and how requests are considered.

## QUESTION 8

Do you have a documented process by which an applicant can request access to their registration records? If so, describe how an applicant can make this request, any exclusions to information that can be provided, and any fees that may apply. Include a link to any published information, if available.

Alignment with the FRPA: *Sections 12(1) through (5) and 16(3)(j)*

### RESPONDENT ANSWER

Yes

No

#### If yes, describe:

This information is listed on our website under the various pathways to registration type :*Upon request, the NSCO will provide an applicant access to the records held that are related to an applicant's application. Please consult our policy concerning this process.*

#### Access to records

An applicant must make a written request to the Registrar if they wish to access their records. The NSCO will respond to the applicant, or their designated person authorized to act on their behalf within 30 days of receiving the request. If the access cannot be accommodated within 30 days, the NSCO will inform the applicant when their records will be accessible. The timeframe may not exceed 90 days. The records may be viewed in person at the NSCO office by appointment. There is no cost for copies of the applicant's records, but a fee of \$.25/page will be charged for any hard copies. The applicant will be responsible for any courier costs. Please note, the NSCO will not provide access to the following documents that may form part of an applicant's record: documents subject to a legal privilege, reference letters, unless the provider of the reference letter explicitly authorizes that the letter be disclosed, documents that are prohibited from disclosure pursuant to an Act or Regulation, documents that are prohibited from disclosure by court order or order of a quasi-judicial tribunal,

documents that could reasonably be expected to threaten or harm the mental or physical health or the safety of another person; or documents that could negatively affect public safety or could undermine the integrity of the registration process

### COMPLIANCE CRITERIA

#### Compliant:

- The regulating body has an established process by which an applicant can make a request in writing for access to their registration records; and
- The regulating body describes how an applicant can make a request, any exclusions to information that can be provided and any fees that may apply.

#### Not compliant:

	<ul style="list-style-type: none"> <li>• The regulating body does not have a documented process by which an applicant can request in writing for access to their registration records; or</li> <li>• The regulating body does not describe how an applicant can make a request, any exclusions to information that can be provided, and any fees that may apply.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p>

## SECTION II: ASSESSMENT CRITERIA AND COMMUNICATION OF DECISION PROCESSES

This section will explore assessment practices and how these practices are communicated to an applicant. An assessment measures an applicant’s skills, knowledge, qualifications, and credentials against the standard that must be met by your regulating body to be granted a licence/certification. Information on the criteria (Examples: exam material, competency information, work experience, requirements, etc.) used for assessment, how that information is communicated to the applicant, and how final registration/application decisions are provided will be requested in this section.

### QUESTION 9

Explain, in detail, the criteria used by the regulating body to assess if an applicant has met requirements to be registered/licensed. (Examples: competencies, pass marks, experience standards, etc.) Also, explain how this information is communicated to applicants. Provide a link(s) to information published in the public domain.

If there is a third-party assessor involved in the process, describe their role in the space provided.

Alignment with the FRPA: *Section 7(d), 16(3)(b) and (i)*

**RESPONDENT  
ANSWER**

Explain the criteria used for assessment and how the information is communicated:

The criteria are listed on our website, [www.nSCO.ca](http://www.nSCO.ca) under the various types of pathways for an applicant.

Briefly, an applicant must submit, a notarized head shot photo, certified copies of academic transcripts, in support of all degrees and qualifications, proof of Canadian citizenship, (if applicable - permanent resident status or authorization under the Immigration Act (Canada) to engage in the practice of optometry) and (if applicable - a certificate of Standing form from all jurisdictions where licensed. The applicant must also include a certificate of successful completion of the OEBC exam. The scoring criteria and pass mark for the exam is listed on their website, <https://oebc.ca/>.

When all documents/fees have been received and uploaded to our system, they are reviewed. The applicant is informed via email that their application has been approved and that the next step in the process is the jurisprudence exam. The applicant is then sent the study materials for the exam. The materials are, the Optometry Act, Regulations, By-Laws and Standards of Practice. When they are ready to write the exam, it is emailed to them, and they have 10 days to complete the open book, multiple choice exam. The pass mark is 80.

The NSCO is in touch with the applicant throughout the process.

It is a matter of providing all of the requested documents, paying the required fees (registration and jurisprudence exam) and passing the jurisprudence exam. The pass mark for the jurisprudence exam is 80.

We are in touch with the applicant throughout the process and this information is located on our website.

[New Graduate](#), [Internationally Trained](#), [CFTA](#)

Is a third party involved in the assessment process?

Yes

No

If yes, name the third-party(s) and describe their role:

*The OEBC, (Optometry Examining Board of Canada)* establishes a psychometrically valid and defensible assessment to establish entry-to-practice competence in optometry in Canada. Its bilingual examinations are developed by the profession, for the profession.

	Every applicant who applies for licensure in Nova Scotia must pass this National exam or its equivalent. The OEBC notifies the college and the candidate when they have successfully passed or not passed their exam. All of the requirements, instructions, dates, fees and pass marks are listed on their public website. Please visit, <a href="http://forac-faroc.ca">http://forac-faroc.ca</a> for more information relating to FORAC.
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body describes all criteria used to assess whether the requirements for registration have been met; and</li> <li>• The regulating body explains how information is communicated; and</li> <li>• The regulating body provides information in a publicly accessible manner; and</li> <li>• The regulating body describes the role of third-party assessors (if applicable).</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not describe all criteria used to assess whether the requirements for registration have been met; or</li> <li>• The regulating body does not explain how information is communicated; or</li> <li>• The regulating body does not provide information in a publicly accessible manner; or</li> <li>• The regulating body does not describe the role of third-party assessors (if applicable).</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Officer:</b>

### QUESTION 10

Explain how you communicate registration decisions to applicants who are: a) successful; and b) not granted registration. Include the approximate length of time required to issue a registration decision, who makes the decision, and what information is provided with each type of decision.

Alignment with the FRPA: *Sections 8(b), (c), (d), 16(3)(l) and (m)*

<p><b>RESPONDENT ANSWER</b></p>	<p><b>Explain the registration decision communication process:</b></p> <p>a) Successful applicants: The Registrar reviews and approves the applications and corrects their jurisprudence exam. Applicants are notified that their application has been sent to the Registrar for review (in writing) and when their completed jurisprudence exam is corrected, they will be notified within 2-4 business days (in writing). This information is listed on our public website under the registration process link, <a href="https://nsco.ca/site/licensing/RegistrationProcess?nav=sidebar">https://nsco.ca/site/licensing/RegistrationProcess?nav=sidebar</a></p> <p>b) Applicants not granted registration: Applicants would be notified throughout the process (in writing) if they are missing the required documents for their application. Once reviewed by the Registrar, they would be notified of any deficiency (in writing). If they were unsuccessful in their jurisprudence exam, they would be notified within 2-4 business days by the Registrar, in writing.</p> <p>If an applicant is dissatisfied with a decision concerning their application, he/she/they may request a review of the original assessment to the NSCO Regulation committee within 30 days. Once notification has been received, review will be held within 45 days of receipt of the request. The applicant will be notified of the results within 30 days of the review.</p> <p>In the case of a review, the following steps will be followed:</p> <ol style="list-style-type: none"> <li>1. An applicant will provide to the NSCO Office a written request for a review. Reasons for the request and any supporting documentation must be provided at this time. Contact information including address, phone number, and email address are also required.</li> <li>2. The review is scheduled.</li> <li>3. The review will be held by the registration committee. The committee will base its decision on a full review of the initial decision, the information in the applicant’s record, the written request for review and any additional documentation provided by the applicant.</li> <li>4. The regulation committee will notify the applicant of its review decision in writing with reasons that explain the basis for the decision. The relevant regulators (Registrar, NSCO admin staff) will also be informed of the decision.</li> </ol> <p><i>Please note: No individual who acted as a decision maker in the initial registration decision will act as a decision maker in the review.</i></p>
<p><b>COMPLIANCE CRITERIA</b></p>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body explains the process they use to communicate registration decisions, and the timeframe; and</li> <li>• The regulating body provides written decisions to all applicants; and</li> </ul>

	<ul style="list-style-type: none"> <li>• The regulating body provides applicants with reasons when registration has not been granted; and</li> <li>• The regulating body provides information on programs/services available to support the future success of applicants, if applicable; and</li> <li>• The regulating body provides a description of the internal review process to applicants who are not granted registration</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not explain the process they use to communicate registration decisions, and the timeframe; or</li> <li>• The regulating body does not provide written decisions to all applicants; or</li> <li>• The regulating body does not provide applicants with reason(s) when registration has not been granted; or</li> <li>• The regulating body does not provide information on programs/services available to support the future success of applicants, if applicable; or</li> <li>• The regulating body does not provide a description of the internal review process to applicants who are not granted registration.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p>

### SECTION III: INTERNAL REVIEW/APPEAL PROCESS

Section 10 of the Act states “Where a regulating body does not provide registration to an applicant, the regulating body shall provide an internal review process within a reasonable time and shall inform the applicant of the internal review process and of the procedures and time frames for the internal review.” This section focuses on the internal review/appeal process, including opportunities for an applicant to provide new information for a decision and details surrounding the decision-makers involved in the internal review/appeal process. Additionally, information on the training provided to individuals who make internal review/appeal decisions will be required.

## QUESTION 11

Do you have a documented internal review process for applicants who disagree with the registration decision? Provide a link to information published in the public domain.

If yes, describe the process including:

- time frames throughout the process; and
- opportunities available to the applicant to provide new information and make submissions with respect to their internal review; and
- how internal reviews decisions are communicated to applicants and what information is included with the decision; and
- who makes internal review decisions.

Alignment with the FRPA: *section 7(a) and 10, 16(3)(m) and (n)*

**Internal review:** a rehearing, reconsideration, review or appeal or other process provided by a regulating body in respect of the merits of a registration decision, regardless of the terminology used to describe the process.

RESPONDENT  
ANSWER

Yes

No

**If yes, explain:**

The information is listed on our website under each registration type. [Review Policy](#)

**Review Policy:**

If an applicant is dissatisfied with a decision concerning their application, he/she/they may request a review of the original assessment to the NSCO Regulation committee within 30 days. For further information, please consult our policy concerning this matter in its entirety.

Once notification has been received, a review will be held within 45 days of receipt of the request. The applicant will be notified of the results within 30 days of the review.

In the case of a review, the following steps will be followed:

	<p>An applicant will provide to the NSCO Office a written request for a review. Reasons for the request and any supporting documentation must be provided at this time. Contact information including address, phone number, and email address are also required.</p> <p>The review is scheduled.</p> <p>The review will be held by the registration committee. The committee will base its decision on a full review of the initial decision, the information in the applicant’s record, the written request for review and any additional documentation provided by the applicant.</p> <p>The regulation committee will notify the applicant of its review decision in writing with reasons that explain the basis for the decision. The relevant regulators (Registrar, NSCO admin staff) will also be informed of the decision.</p> <p><i>Please note: No individual who acted as a decision maker in the initial registration decision will act as a decision maker in the review.</i></p> <p><b>If no, explain why not:</b></p>
<p><b>COMPLIANCE CRITERIA</b></p>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body has a documented internal review process; and</li> <li>• The regulating body describes time frames associated with the internal review process; and</li> <li>• The regulating body describes opportunities the applicant has to provide new information and make submissions with respect to their internal review; and</li> <li>• The regulating body describes how internal review decisions are communicated to applicants and what information is included with the decision; and</li> <li>• The regulating body ensures that no one who acted as a decision-maker in respect of a registration decision can act as a decision-maker in an internal review; and</li> </ul> <p>The regulating body provides information on the internal review process in a publicly accessible manner.</p> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not have a documented internal review process; or</li> <li>• The regulating body does not describe time frames associated with the internal review process; or</li> <li>• The regulating body does not describe opportunities the applicant has to provide new information and made submissions with respect to their internal review; or</li> </ul>

	<ul style="list-style-type: none"> <li>• The regulating body does not describe how internal review decisions are communicated to applicants and what information is included with the decision; or</li> <li>• The regulating body does not ensure that anyone who acted as a decision-maker in respect of a registration decision can act as a decision-maker in an internal review; or</li> <li>• The regulating body does not provide information on the internal review process in a publicly accessible manner.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p>

## QUESTION 12

Have the decision-makers for the internal review received training on conducting on an internal review? If so, describe the training.

Alignment with the FRPA: *Sections 11 and 16(3)(p)*

<b>RESPONDENT ANSWER</b>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><b>If yes, please describe:</b></p> <p>Internal review training could be arranged on an ad hoc basis or when required.</p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body ensures that internal review decision-makers have received training on conducting an internal review; and</li> <li>• The regulating body describes the training.</li> </ul>

	<p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does not ensure that internal review decision-makers have received training on conducting an internal review; or</li> <li>• The regulating body does not describe the training.</li> </ul>
<p><b>REVIEW FINDINGS</b></p>	<p><b>To be completed by the FRPA Review Officer:</b></p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
<p><b>COMMENTS: REVIEW FINDINGS</b></p>	<p><b>Comments, to be completed by the FRPA Review Officer:</b></p> <p>To be compliant with the FRPA the regulating body must ensure that individuals acting as decision-makers in internal reviews are prepared and receive training on conducting an internal review and, there must be a description of the training provided to individuals who make internal review decisions.</p>

## V: ACKNOWLEDGEMENTS:

The *Nova Scotia College of Optometrists* hereby declares that the information contained in this report is a true and accurate representation of current registration practices of the organization and agrees to take action to address items of non-compliance as per the following Action Plan.

### SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

2022-03-25



Sheldon Pothier, OD  
Registrar

Signed by: S-1-12-1-2533757863-1284473259-859472059-705540953/50e413a2-375b-419f-989f-dea134fed7d3/

## APPENDIX A: ACTION PLAN

Note: The intent of the Action Plan is to identify how the items of noncompliance are going to be corrected before the next review period to ensure compliance, fairness, and transparency, as required by the Act.

NAME OF REGULATING BODY: Nova Scotia College of Optometrists

INFORMATION ON REGISTRATION PRACTICES AS OF: Click or tap to enter a date.

### ACTION PLAN TIMELINES:

TIMELINES FOR ACTION PLAN PROGRESS UPDATES					
	Action Plan Deadline	Action Plan Progress Update 1	Action Plan Progress Update 2	Action Plan Progress Update 3	Action Plan Progress Update 4
<b>Due Date</b>	2021-02-05	2023-01-28	Update 1 + 1yr if necessary	Update 2 + 1yr if necessary	Update 3 + 1yr if necessary
<b>Actual Completed Date</b>	2022-01-28				

### ACTION PLAN:

<b>ACTION PLAN – AREA 1:</b>	<b>Response to FRPA Review Question #3: “Registration of Interprovincial Applicants”.</b>
<b>FRPA SECTIONS:</b>	<b>Sections 3, 6, 7 (c), 9(a), 16(3)(b), (e) and (g)</b>
<b>AREAS OF NON-COMPLIANCE TO BE ADDRESSED:</b>	<p>The regulating body does not have a streamlined process to license applicants certified in another Canadian jurisdiction that regulates the same occupation. In particular:</p> <p>The process identifies that in addition to requiring the same official documentation as required of a new applicant, Canadian Free Trade Agreement (CFTA) applicants are asked to provide “Certificate of Standing” forms. Official documentation that has already been assessed in another jurisdiction is an additional material requirement that negates a streamlined application process. It is permissible to ask for evidence of good standing in the jurisdiction where the applicant is currently licensed, and registration should be based on this alone (a jurisprudence exam is okay to include). The application form should be amended to reference the CFTA rather than the AIT. To be compliant with the FRPA, a streamlined process aligned with requirements of the CFTA is required to license applicants certified in another Canadian jurisdiction.</p>
<b>REGULATOR ACTION PLAN:</b>	<b>The Registration of Interprovincial Applicants has been modified. These applicants must complete the application form +provide a passport photo (part of the application) and a certificate of standing for any jurisdiction (s) where they have been licensed. They then</b>

	<b>must complete a jurisprudence exam prior to licensure. Please see the following link for the changes for this type of <a href="#">applicant</a>. As well, the AIT reference on the application form has been changed to CFTA.</b>
<b>Year 1: Action Plan update. Due: 2023-01-28</b>	N/A
<b>FRPA Review Officer Comments</b>	The above noted actions completed by the regulating body have satisfied the above noted areas of non-compliance. No further updates are required.

<b>ACTION PLAN – AREA 2:</b>	<b>Response to FRPA Review Question #7: “Accommodation practices for applicants with a physical or mental disability”.</b>
<b>FRPA SECTIONS:</b>	<b>Sections 16(3)(h)</b>
<b>AREAS OF NON-COMPLIANCE TO BE ADDRESSED:</b>	<ul style="list-style-type: none"> <li>• The regulating body does not have a description of existing accommodation practices for applicants with a physical or mental disability; or</li> <li>• The regulating body does not have a clear process for applicants to request accommodation and understand how requests will be considered; or</li> <li>• The regulating body does not provide a description of accommodation practices in a publicly accessible manner.</li> </ul>
<b>REGULATOR ACTION PLAN:</b>	<p><b>The process is listed below and is now up on our website. The policy can be found in each membership type, <a href="#">New Graduate</a>, <a href="#">Interprovincial</a> and <a href="#">Internationally trained</a></b></p> <p>The NSCO will make reasonable efforts to accommodate applicants with special needs.</p> <p><b>Request for Accommodation</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Requests for accommodations are to be made to the Registrar (in writing). A request for an accommodation must include: <ul style="list-style-type: none"> <li><input type="checkbox"/> the nature of the disability,</li> <li><input type="checkbox"/> the type of accommodation being requested, and</li> <li><input type="checkbox"/> where available, a description of what accommodations the applicant has received in the past.</li> </ul> </li> <li><input type="checkbox"/> Depending on the nature of the disability and the type of accommodation being requested, the Registrar may request that the applicant provide additional evidence to support their request. Such additional evidence may include, but is not limited to, a formal medical diagnosis, or documentation from a health practitioner explaining the need for the accommodation being requested.</li> </ul> <p><b>Types of Accommodation</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The Registrar is not required to provide the applicant with their preferred type of accommodation. In cases where the applicant’s specific request cannot be accommodated, the Registrar will work with the applicant to determine a reasonable accommodation that will enable the applicant to overcome the discriminatory effect of the application process.</li> </ul>

	<ul style="list-style-type: none"> <li><input type="checkbox"/> If the requester and the NSCO cannot agree on what type of accommodation is appropriate in any case, the Registrar will make a determination as to what accommodation, if any, is to be provided.</li> <li><input type="checkbox"/> Examples of accommodations that can be made include, but are not limited to: <ul style="list-style-type: none"> <li><input type="checkbox"/> assistance in completing application forms,</li> <li><input type="checkbox"/> methods of communication that differ from the NSCO’s regular process,</li> <li><input type="checkbox"/> alternate times/locations for in-person meetings/interviews/hearings.</li> </ul> </li> <li><input type="checkbox"/> Examples of accommodations that can be made for the NSCO’s EXAMINATION include, but are not limited to: <ul style="list-style-type: none"> <li><input type="checkbox"/> additional time,</li> <li><input type="checkbox"/> translation assistance (e.g. reader, recorder, interpreter for the hearing impaired, voice-output software),</li> <li><input type="checkbox"/> modification of test material (e.g. large font, coloured paper, computerized),</li> </ul> </li> <li><input type="checkbox"/> The Registrar may decline to provide any accommodation when doing so would circumvent a bona fide occupational requirement.</li> <li><input type="checkbox"/> Notes related to the accommodation request are kept separate from other file materials in order to avoid inappropriate disclosure of personal health information.</li> </ul>
<b>Year 1: Action Plan update.</b> <b>Due: 2023-01-28</b>	N/A
<b>FRPA Review Officer Comments</b>	The above noted actions completed by the regulating body have satisfied the above noted areas of non-compliance. No further updates are required.

<b>ACTION PLAN – AREA 3:</b>	<b>Response to FRPA Review Question #12: “Internal Review Training”.</b>
<b>FRPA SECTIONS:</b>	<b>Sections 10(1), (2), (4) and 16(3)(m)</b>
<b>AREAS OF NON-COMPLIANCE TO BE ADDRESSED:</b>	<ul style="list-style-type: none"> <li>• The regulating body does not ensure that internal review decision-makers have received training on conducting an internal review;</li> <li>• The regulating body does not describe the training.</li> </ul>
<b>REGULATOR ACTION PLAN:</b>	A complete review of the NSCO’s registration process, required documents and review policy will be undertaken by the committee on April 23, 2022. Please note, the committee has also attended a lecture on sensitivity training on November 13, 2021.
<b>Year 1: Action Plan update.</b> <b>Due: 2023-01-28</b>	To be completed by the Regulator by the noted due date.
<b>FRPA Review Officer Comments</b>	As noted by the regulating body, this area is a work in progress. Therefore, another update will be required until complete.