



ACTION PLAN -YEAR 1 PROGRESS UPDATE

NOVA SCOTIA COLLEGE OF OPTOMETRISTS

As per the following Action Plan Progress Report and FRPA Review Officer comments:

All areas of non-compliance, as originally identified in the March 11, 2022 FRPA review report, have now been brought into compliance.

ACTION PLAN TIMELINES:

TIMELINES FOR ACTION PLAN PROGRESS UPDATES					
Due Date	Action Plan Deadline	Action Plan Progress Update 1	Action Plan Progress Update 2	Action Plan Progress Update 3	Action Plan Progress Update 4
	2021-02-05	2023-01-28	Update 1 + 1yr if necessary	Update 2 + 1yr if necessary	Update 3 + 1yr if necessary
Actual Completed Date	2022-01-28	2022-01-16			

ACTION PLAN:

ACTION PLAN – AREA 1:	Response to FRPA Review Question #3: “Registration of Interprovincial Applicants”.
FRPA SECTIONS:	Sections 3, 6, 7 (c), 9(a), 16(3)(b), (e) and (g)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<ul style="list-style-type: none"> The regulating body does not have a streamlined process to license applicants certified in another Canadian jurisdiction that regulates the same occupation. In particular: 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.
REGULATOR ACTION PLAN:	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 must complete a jurisprudence exam prior to licensure. Please see the following link for the changes for this type of applicant . As well, the AIT reference on the application form has been changed to CFTA.
Year 1: Action Plan update. Due: 2023-01-28	N/A
FRPA Review Officer Comments (2022-03-11)	The above noted actions completed by the regulating body have satisfied the above noted areas of non-compliance. No further updates are required.

ACTION PLAN – AREA 2:	Response to FRPA Review Question #7: “Accommodation practices for applicants with a physical or mental disability”.
FRPA SECTIONS:	Sections 16(3)(h)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<ul style="list-style-type: none"> • The regulating body does not have a description of existing accommodation practices for applicants with a physical or mental disability; or • The regulating body does not have a clear process for applicants to request accommodation and understand how requests will be considered; or • The regulating body does not provide a description of accommodation practices in a publicly accessible manner.
REGULATOR ACTION PLAN:	<p>The process is listed below and is now up on our website. The policy can be found in each membership type, New Graduate, Interprovincial and Internationally trained</p> <p>The NSCO will make reasonable efforts to accommodate applicants with special needs.</p> <p>Request for Accommodation</p> <ul style="list-style-type: none"> <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"> <input type="checkbox"/> the nature of the disability, <input type="checkbox"/> the type of accommodation being requested, and <input type="checkbox"/> where available, a description of what accommodations the applicant has received in the past. <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. <p>Types of Accommodation</p> <ul style="list-style-type: none"> <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. <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. <input type="checkbox"/> Examples of accommodations that can be made include, but are not limited to: <ul style="list-style-type: none"> <input type="checkbox"/> assistance in completing application forms, <input type="checkbox"/> methods of communication that differ from the NSCO’s regular process, <input type="checkbox"/> alternate times/locations for in-person meetings/interviews/hearings. <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"> <input type="checkbox"/> additional time, <input type="checkbox"/> translation assistance (e.g. reader, recorder, interpreter for the hearing impaired, voice-output software), <input type="checkbox"/> modification of test material (e.g. large font, coloured paper, computerized), <input type="checkbox"/> The Registrar may decline to provide any accommodation when doing so would circumvent a bona fide occupational requirement. <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.
Year 1: Action Plan update. Due: 2023-01-28	N/A
FRPA Review Officer Comments (2022-03-11)	The above noted actions completed by the regulating body have satisfied the above noted areas of non-compliance. No further updates are required.

ACTION PLAN – AREA 3:	Response to FRPA Review Question #12: “Internal Review Training”.
FRPA SECTIONS:	Sections 10(1), (2), (4) and 16(3)(m)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<ul style="list-style-type: none"> • The regulating body does not ensure that internal review decision-makers have received training on conducting an internal review; • The regulating body does not describe the training.
REGULATOR ACTION PLAN:	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.
FRPA Review Officer Comments (2022-03-11)	As noted by the regulating body, this area is a work in progress. Therefore, another update will be required until complete.
Year 1: Action Plan update. Due: 2023-01-28	The internal review decision makers and Board members received training on April 23, 2022 by the college's lawyer. The training involved a review of the responsibilities of the registration committee as outlined in the college's Act, Regulations, and By Laws. The decision makers and Board members also reviewed the best practices for conducting a registration appeal procedure.
FRPA Review Officer Comments (2023-01-16)	The above noted actions completed by the regulating body have satisfied the above noted areas of non-compliance. No further updates are required.

SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:



Name (print): S. J. Pothier

DATE: 2023-01-16