

**ACTION PLAN -YEAR 2 PROGRESS UPDATE
NOVA SCOTIA COLLEGE OF DISPENSING OPTICIANS**

As per the following Action Plan Progress Report and FRPA Review Officer comments, of the twelve compliance areas originally identified in the September 2021 FRPA review report, all but one (Area# 1) have now been addressed. Full compliance is expected to be demonstrated in the Year 3 progress report, due **September 30, 2024**.

ACTION PLAN TIMELINES:

| TIMELINES FOR ACTION PLAN PROGRESS UPDATES | | | | | |
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| | Action Plan Deadline | Action Plan Progress Update 1 | Action Plan Progress Update 2 | Action Plan Progress Update 3 | |
| Due Date | 2021-09-15 | 2022-09-30 | 2023-09-30 | 2024-09-30 | |
| Actual Completed Date | 2021-09-15 | 2022-11-25 | 2023-09-19 | | |

ACTION PLAN:

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| ACTION PLAN – AREA #1: | Response to FRPA Review Question #1: |
| FRPA SECTIONS: | Sections 7(c), 9(a), 16(3)(a), (b) and (g) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - Address the deficiency in transparency by providing all details in a publicly accessible manner regarding registration requirements and how requirements are to be met - create a registration section on the NSCDO website to provide information on registration practices in a clear and understandable form, inclusive of qualifications, documentation requirements and application process - ensure that the blank application forms are accessible from the registration section of the website. |
| REGULATOR ACTION PLAN: | <p>Create a Registration Section of the NSCDO Website called “Applicants”. Content to include:</p> <ul style="list-style-type: none"> - Overview: General information on what an Optician does: <ul style="list-style-type: none"> i) Include information on both Dispensing Optician License and Contact Lens Fitter License ii) List of Registration Fees - Information for the following 3 applicant types <ol style="list-style-type: none"> 1) Internationally Registered Applicant 2) Accredited Education Applicant 3) Unaccredited Education Applicant - Under each of the sections address how to apply as a student including: <ul style="list-style-type: none"> i) Include a section on applying as Accredited or Unaccredited applicant explaining the difference between the two ii) Include list of Accredited institutions iii) Include a section on Transfer Applications iv) Letter of Enrollment from the educational institution v) Letters of Standing, if necessary, from education institution vi) Application Form both printable and smart form vii) Proof of Sponsorship and Employment viii) Requirements to become an optician both provincial and national ix) Include section on Examinations x) Include a section on how to register as an Optician once exams are passed xi) Section with instruction regarding how to appeal a decision |
| INTENDED COMPLETION DATE: | Complete by October 11, 2021 |
| Year 2: Action Plan update. | Completed September 7, 2023 |

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| Due: 2023-09-30 | |
| FRPA Review Officer Comments (2023-09-09) | <p>Compliance with the above cited FRPA Sections could not be determined based on the information provided above or via NSCDO's website (https://nscdo.ca/) on September 9, 2023. In particular, for a non-student "New" applicant (Canadian credentials and not currently registered in another Canadian Jurisdiction), it is not clear where to send what documents/information to apply for registration. This information must be clear and publicly available.</p> <p>Specific issues include (as observed on Sept 9, 2023):</p> <ol style="list-style-type: none"> 1) On this page of NSCDO's website: https://nscdo.ca/page-1075369 ...the following statement, with hyperlink, appears: "Remember to register first with the provincial optician regulator of your choice to ensure you are meeting all of their professional requirements. Click here to register with NSCDO." ...but when the link is clicked, it only includes information for student registration (and has no information for non-students). 2) On this page of NSCDO's website: https://nscdo.ca/page-1075398 ...the following statement appears: "Once you have passed the NACRO exam you will receive notification from NSCDO which will outline the next steps required to be licensed" ...however these steps are not otherwise detailed. The page includes a link to an application form but does not say where to send it or what, if anything, should be included with the application form. <p>Therefore, a Year 3 progress report will be required by September 30, 2024. Compliance is expected to be demonstrated by that time.</p> |

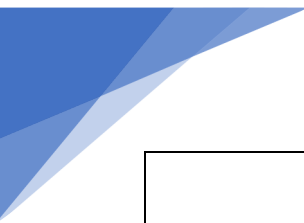
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| ACTION PLAN – AREA #2: | Response to FRPA Review Question #2: |
| FRPA SECTIONS: | Sections 7(c), 9(a), 16(3)(b) and (g) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - To address the requirement for transparency and procedural fairness document accurate information on the PLAR process and how requirements for registration are to be met by applicants who received their qualifications outside of Canada - Designate a portion of the registration section of the NSCDO website for internationally educated applicants providing information on the PLAR process in a clear and understandable form, inclusive of documentation requirements and application process, with easy access to the relevant application form, as well as links to helpful information. |
| REGULATOR ACTION PLAN: | <ul style="list-style-type: none"> - Work with the PLAR committee to improve transparency as regards Applicants from outside of Canada - Provide the steps required to become a Canadian Optician in clearer language and a userfriendly format - Create a new Header-Section - Change the section title from PLAR to International Applicants - Provide a detailed list with descriptions of required documents |
| INTENDED COMPLETION DATE: | Complete by October 11, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 1, 2023. |
| FRPA Review Officer Comments (2023-09-06) | Compliance with the above cited FRPA Sections, as they pertain to international applicants, could be determined from the information found on NSCDO's website (https://nscdo.ca/) on September 6, 2023. |

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| ACTION PLAN – AREA #3: | Response to FRPA Review Question #3: |
| FRPA SECTIONS: | Sections 3, 6, 7 (c), 9(a), 16(3)(b), (e) and (g) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - Address the deficiency in transparency by documenting in a publicly accessible manner information about a streamlined registration process and how requirements for registration are to be met by applicants who are registered in another jurisdiction in Canada - Designate a portion of the registration section of the NSCDO website for applicants licensed in another jurisdiction (Advance Candidate) providing information on a streamlined process in a clear and understandable form, with easy access to the relevant application form. |
| REGULATOR ACTION PLAN: | Under the Applicant section include: |

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| | <ul style="list-style-type: none"> - Description of Transfer Applicant from Outside of Nova Scotia - List of documents required including: <ul style="list-style-type: none"> i) Application Form ii) Letter of Good Standing from Current province iii) Proof of Insurance - Information on Fee Payment - Change the fees on website to align with the NS applicant fee |
| INTENDED COMPLETION DATE: | Complete by October 11, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 1, 2023 |
| FRPA Review Officer Comments (2023-09-06) | Compliance with the above cited FRPA Sections, as they pertain to interprovincial applicants, could be determined from the information found on NSCDO's website (https://nscdo.ca/) on September 6, 2023. |

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| ACTION PLAN – AREA #4: | Response to FRPA Review Question #4: |
| FRPA SECTIONS: | Sections 7(f), 16(3)(d) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document accurate and consistent information about any fees for registration - communicate detailed information about fees in a publicly accessible manner |
| REGULATOR ACTION PLAN: | <ul style="list-style-type: none"> - Create a dedicated section that outlines fees for all application, registration, and service processes - Ensure the fees align with the NSCDO By-Laws |
| INTENDED COMPLETION DATE: | Complete by October 11, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | In progress, estimated completion date December 31, 2022 |
| FRPA Review Officer Comments (2023-09-06) | Compliance with the above cited FRPA Sections was determined from the information found on this page of NSCDO's website: https://nscdo.ca/page-1075374 , on September 6, 2023, which details the fees for registration. |

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| ACTION PLAN – AREA #5: | Response to FRPA Review Question #5: |
| FRPA SECTIONS: | Sections 9(b), 16(3)(c) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document guidelines that describe alternative documentation an applicant may provide when required documentation cannot be obtained for reasons beyond their control - document guidelines for applicants about information required to consider a request to accept alternative documentation |
| REGULATOR ACTION PLAN: | <ul style="list-style-type: none"> - Provide Alternative or substitutions for documentation that may be allowed on a case-by-case basis. - List the process for applying for an exception - Create, post and describe an Exception Request Form |
| INTENDED COMPLETION DATE: | Complete by October 18, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 7, 2023 – NSCDO does not accept any alternative information. Alternative documents pertaining to national exams are referred to NACOR. |
| FRPA Review Officer Comments (2023-09-09) | The relevant requirement is provided for under Subsection 9(b) of the FRPA, which states: |



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| | <p>9 A regulating body shall: ... (b) where documentation cannot be obtained by an applicant for reasons beyond the applicant's control, advise the applicant what alternative information may be supplied by the applicant that may be acceptable to the regulating body.</p> <p>Section 16 requires reporting on this same requirement within this FRPA review report. The does not require a regulating body to accept alternative information. It only requires that regulating bodies advise applicants of what alternative information may be acceptable if any at all. Advising that there is no alternative information that may be acceptable is consistent with this requirement. No further follow-up is required.</p> |
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| ACTION PLAN – AREA #6: | Response to FRPA Review Question #7: |
| FRPA SECTIONS: | Sections 16(3)(h) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document a description of existing accommodation practices for applicants with physical or mental disabilities which includes: <ul style="list-style-type: none"> - what is required to request an accommodation - how the request will be considered and communicated back to the applicant. |
| REGULATOR ACTION PLAN: | <ul style="list-style-type: none"> - Create a section on the website regarding accommodations - Include how to declare as an applicant with physical or mental disabilities - Create content regarding existing accommodation practices - Provide an application form for Accommodation Requests - Describe how the request will be processed and by whom (e.g, Board, Registrar, Other) |
| INTENDED COMPLETION DATE: | Complete by November 1, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 7, 2023 – NSCDO does not require accommodation policies. Accommodations pertaining to national exams are referred to NACOR. |
| FRPA Review Officer Comments (2023-09-09) | <p>The relevant requirement is provided for under Subsection 16(3)(h) of the FRPA, which states:</p> <p style="text-align: center;">16 (3) The [FRPA review] report ...must include: ...(h) a description of existing accommodation policies for applicants with a physical disability or mental disability; ...</p> <p>This does not require that there be any such accommodation policies. It only requires that, if there are any, that they be described in this FRPA review report. The response confirms that no such policies exist and therefore meets the requirement of this quoted section. No further follow-up is required.</p> |

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| ACTION PLAN – AREA #7: | Response to FRPA Review Question #9: |
| FRPA SECTIONS: | Sections 7(d), 16(3)(i) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | Areas of non-compliance to be addressed in an action plan are as follows: - document detailed information on the criteria used to assess whether requirements for registration have been met such as examination pass marks, criteria used for PLAR Committee approval - communicate information about assessment in a publicly accessible manner including information on the role of NACOR with links to their standards of assessment. |
| REGULATOR ACTION PLAN: | Create a section header Registering As An Optician Provide application form List other requirements: Exams Marks from NACOR Credit Card information Form Instructions to apply and pay online Proof of Employment Proof of Insurance. |
| INTENDED COMPLETION DATE: | Complete by November 30, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 1, 2023 |
| FRPA Review Officer Comments (2023-09-06) | The action items noted above have been complete. No further updates are required in the FRPA review cycle. |

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| ACTION PLAN – AREA #8: | Response to FRPA Review Question #11: |
| FRPA SECTIONS: | Sections 7(a), 10(1) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | Areas of non-compliance to be addressed in an action plan are as follows: - Ensure that a process is in place for an internal review of the registration decision - Communicate information about the internal review process in a publicly accessible manner - Document how and when applicants who have not been granted registration are informed about the internal review process - Document how an applicant who has not been granted registration can initiate an internal review of the registration decision |
| REGULATOR ACTION PLAN: | Create section header “Appeals” Include Subsection “Application Appeal Process” Include information on the NSCDO Appeals Committee and ensure that information is easily accessible to the public including: Member committee names and titles Under each Application type (International, Accredited and Unaccredited) Will provide information on How to file an appeal Content to include: - the overall process of an appeal/review Timelines: - For applicant to appeal the decision - For committee to respond - For decision by the committee Provide content on how the decision will be communicated back to the appellant |
| INTENDED COMPLETION DATE: | Complete by November 30, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 1, 2023 |
| FRPA Review Officer Comments (2023-09-06) | The action items noted above have been complete. No further updates are required in the FRPA review cycle. |

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| ACTION PLAN – AREA #9: | Response to FRPA Review Question #12: |
| FRPA SECTIONS: | Sections 10(1), (2), (4) and 16(3)(m) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document a detailed internal review policy/process that includes the following: <ul style="list-style-type: none"> o procedures - how the internal review process works o opportunities for the applicant to provide new information and to make submissions in support of their internal review (documented evidence, hearing, etc.) o timeframes associated with the process |
| REGULATOR ACTION PLAN: | <p>Under the Appeals Section Create rules, regulations, and policy for the Registration Appeals Committee</p> <p>For the Applicant Provide content on the overview of the Appeals Process</p> <p>Provide details regarding documentation required by the applicant/appellant for the application</p> <p>Create a “Registration Decision Appeals” application form</p> <ul style="list-style-type: none"> - Form to include area for submission of additional documents that may support the appeal <p>Regarding the Committee: Provide opportunity of a “discovery” meeting where the applicant can meet in person with the Committee to provide clarity</p> <p>Allow applicant to have emotional support person when at the discovery meeting</p> <p>The section will provide clearly laid out timelines by which the processes must be completed</p> |
| INTENDED COMPLETION DATE: | Complete by November 30, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 1, 2023 |
| FRPA Review Officer Comments (2023-09-06) | The action items noted above have been complete. No further updates are required in the FRPA review cycle. |

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| ACTION PLAN – AREA #10: | Response to FRPA Review Question #13: |
| FRPA SECTIONS: | Sections 10(5) and 16(3)(n) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | <p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - ensure that internal review decision-makers are different from the original decision-makers - document the process that is used to ensure that no one who acted as a decision-maker in a registration decision may act as a decision-maker in an internal review of the same decision - Include in the description of the internal review process a statement to the effect that no one who acted as a decision maker in a registration decision may act as a decision maker in an internal review of the same decision |
| REGULATOR ACTION PLAN: | <p>To form an Appeals Committee</p> <p>Under the Appeals Section there will be information on how the committee is formed and that it will not include the original decision maker.</p> <p>A statement of declaration that no one who was a part of the original decision-making process will be part of the appeal committee.</p> |
| INTENDED COMPLETION DATE: | Complete by November 30, 2021 |
| Year 2: Action Plan update. | Completed September 7, 2023 |

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| Due: 2023-09-30 | |
| FRPA Review Officer Comments (2023-09-09) | Compliance with the above cited FRPA Section could be determined from the information found on NSCDO's website (https://nscdo.ca/) on September 9, 2023. |

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| ACTION PLAN – AREA #11: | Response to FRPA Review Question #14: |
| FRPA SECTIONS: | Sections 11, 16(3)(p) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | Areas of non-compliance to be addressed addressed in an action plan are as follows: - ensure that individuals acting as decision-makers in internal reviews receive training on conducting an internal review. - develop a plan and document training provided to individuals who make internal review decisions |
| REGULATOR ACTION PLAN: | Provide training opportunities for all Appeals Committee members Make the training mandatory to be part of the committee Will develop and provide each Appeals Committee member with a manual on the Appeals Committee process The manual will be part of the training process and provided to the member upon completion of the training. A review will be necessary to determine who to bring in to do the initial training and it will be used as a “Train the Trainer” facilitation. |
| INTENDED COMPLETION DATE: | Complete by November 30, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 7, 2023 |
| FRPA Review Officer Comments (2023-09-09) | Compliance with the above cited FRPA Section could be determined from the information found on NSCDO's website (https://nscdo.ca/) on September 9, 2023. |

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| ACTION PLAN – AREA #12: | Response to FRPA Review Question #15: |
| FRPA SECTIONS: | Sections 10(3) |
| AREAS OF NON-COMPLIANCE TO BE ADDRESSED: | Areas of non-compliance to be addressed in an action plan are as follows: - document the process used by internal review decision makers to communicate internal review decisions that includes the following: o timeframe for decision-making o all decisions are provided in writing o reasons for the internal review decision. |
| REGULATOR ACTION PLAN: | The Appeals Section will include timelines for the following: Timeframe in which the appeal must be submitted by the applicant What information is required for the appeal to be reviewed: i.e. original decision, documents previously submitted Additional supporting documents not previously submitted A Reasons and Decisions Letter by the Committee Chair to be provided to the applicant outlining the appeal, the decision, and the reason for the decision. If the decision is in favor of the applicant, then the next steps will also be addressed Copy to be sent to the Registrar for record purposes and to the applicant Action items may be outlined such as the Registrar is to implement the Registration process with the Applicant. |
| INTENDED COMPLETION DATE: | Complete by November 30, 2021 |
| Year 2: Action Plan update. Due: 2023-09-30 | Completed September 1, 2023 |
| FRPA Review Officer Comments (2023-09-06) | Compliance with the above cited FRPA Section could be determined from the information found on NSCDO's website (https://nscdo.ca/) on September 6, 2023. |



SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

2023-09-19

X Cavell Ferguson

Signed by: 3a5a70a1-9eb3-481a-b1f2-6d6da4f2f51f

Name (print): _____

DATE: Click or tap to enter a date.