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Nova Scotia College of Counselling  
Therapists

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Fair Registration Practices Act (FRPA)  
Review Report  
May 2021

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Province of Nova Scotia

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## EXECUTIVE SUMMARY

Under section 16 of the Fair Registration Practices Act (FRPA), all regulating bodies in Nova Scotia are required to review their registration practices and file a report on the results of the review with the Review Officer. The Review Officer works collaboratively with regulators to gather information in an established report format, to ensure that information on current registration practices is accurately represented, and to identify gaps in registration practices which would result in a regulator action plan to rectify any issues that may have been identified with compliance.

The Review Officer worked with the Nova Scotia College of Counselling Therapists (NSCCT) over a period of four months to complete this review. Questions to probe the status of registration practices were posed, the regulator engaged in a process of self-examination and provided written responses to the questions (see Analysis of Registration Practices). Responses were examined by the Review Officer and measured against the standard set forth in the FRPA to identify any gaps in registration practices. Based on this process, the Review Officer has determined that all registration practices are compliant with the FRPA except for one area that is currently under development. This report includes an overview of the current registration practices of NSCCT as well as an action plan to resolve the one current gap.

NSCCT has made significant progress from their initial FRPA review in 2019. At that time findings showed multiple gaps in registration practices demonstrating a lack of transparency, impartiality, objectivity, and procedural fairness. Furthermore, the review was unusually prolonged due to a lack of participation by NSCCT. It was evident that applicants did not have access to fair registration practices. NSCCT were assigned 16 actions to bring registration practices into compliance with the FRPA and another full review was scheduled to be launched the following year. To their credit NSCCT took this assignment seriously, did some internal reorganization and reached out to the FRPA Review Office for some information and advice. They have fully participated in this review process, met all assigned deadlines, and have built some commendable registration practices.

NSCCT used this review process as an opportunity for self-audit and to introduce policies and processes recently developed to address the gaps previously found in their registration practices. The regulator has acknowledged the findings, continues to address improvements, and has an Action Plan (see Appendix A) to address the one final gap that was found in registration practices. Since this review began, NSCCT has developed a training plan for those who make internal review decisions and moving forward will ensure that this plan is implemented.

Findings of this review show that NSCCT has made a renewed commitment to the delivery of registration practices that are transparent, objective, impartial and procedurally fair. A tremendous amount of development has taken place over the past year as legislation and by-laws have been translated to, and supplemented with, plain language policies and processes that are fully accessible to applicants. Now that these new procedures have been introduced, NSCCT will need to ensure that practices are fully implemented, attending to feedback from applicants to monitor their effect.

NSCCT has demonstrated engagement in the FRPA review process and has given every indication that a commitment to offering fair registration practices will continue. A special thanks to John Hubert, Registrar and Executive Director who has been instrumental in getting NSCCT back on track with registration practices and has been a pleasure to work with throughout the review process. The FRPA Review Office will look for an update on the Action Plan in June 2022.

Sincerely,



Patricia Mertins

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 48 [regulatory bodies](#) in Nova Scotia, covering 58 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

The Nova Scotia College of Counselling Therapists is the public-interest regulator for Counselling Therapists in the Province. NSCCT was established by proclamation of the [Counselling Therapists Act](#) on October 11, 2011. The College mandate is to: 1) serve and protect the public interest; 2) preserve the integrity of the Counselling Therapy profession; and, 3) maintain public confidence in the ability of the profession to regulate itself. The College fulfils this mandate by ensuring that: a) only fully qualified individuals who have met rigorous academic and clinical practice standards are licensed by the College; b) all registrants adhere to recognized [Standards of Practice](#) and a prescribed [Code of Ethics](#); c) all registrants meet the requirements for on-going skills maintenance and continuing education; and, d) the public has access to a robust and objective complaint process. Oversight of the College is provided through a statutory Board of Directors, made up of elected members and government appointed public representatives. The Board Executive is comprised of the Chair, Vice Chair, Past Chair, Secretary, and Treasurer. The remainder of the Board includes four Members-at-Large, three Public Representatives and the Executive Director/Registrar in a non-voting capacity. The statutory functions of the College are fulfilled by:

[Registration Committee](#): Oversees the registration and licensure process of the College and makes decisions to approve or deny applications.

[Registration Appeal Committee](#): Reviews decisions of the Registrar/Registration Committee upon request of applicants who have been denied registration or licensure. Decisions of the Registration Appeal Committee are considered by the *Act* to be final.

[Complaints Committee](#): Reviews all complaints against registrants of the College referred from the registrar, in order to determine the appropriate disposition through: 1) dismissal of the complaint; 2) counsel/caution; 3) undertaking/consent-revocation; or, 4) referral to the Professional Conduct Committee.

[Professional Conduct Committee](#): Administers formal professional conduct hearings concerning allegations referred by the Complaints Committee. A panel established by the Committee will hear evidence to determine if the complaint amounts to a finding of professional misconduct, conduct unbecoming, incompetence/incapacity. The Committee will then dismiss the complaint or determine and implement appropriate sanctions.

[Reinstatement Committee](#): Reviews applications from individuals seeking reinstatement of their registration or license to practice, after having it revoked by the Professional Conduct Committee.

The work of the College is also supported through the Board-guided activities of three Ancillary Committees:

[Ethics and Practice Standards Committee](#): Is responsible to review the ethics and practice documents adopted by the College, support the work of other committees on relevant issues, and offer advice to the College and registrants when requested, to help ensure the public has access to safe, competent and ethical care.

[Policy and Procedures Committee](#): Exists to review, update and develop policies and procedures at the request of the Board as necessary to support the mandate and operation of the College. It also acts as the lead committee in preparing governmental reviews of the College.

[Public Engagement and Professional Liaison Committee](#): Contributes to any work of the College related to matters where the Collage is expected to engage directly with the public or media, or when it has occasion to interact in an official capacity with other regulators. This may include the development of media releases, informational materials on public-interest regulation, and the maintenance of the College website.

### **Occupations Regulated**

NSCCT regulates a single professional occupation, i.e., Registered Counselling Therapy, at two levels of licensure: 1) Registered Counselling Therapist-Candidate (RCT-C); and, Registered Counselling Therapist (RCT). The former covering the 2-to-5-year period of licensed counselling practice under supervision required prior to being fully licensed for independent practice as an RCT.

## Occupational Profile

Counselling Therapy involves assisting clients through the counselling relationship, using a combination of mental health and human development principles, methods and techniques to achieve mental, emotional, physical, social, moral, educational, spiritual or career development and adjustment through their lifespan. Counselling Therapy is primarily a talk-based therapy which utilizes a variety of professional competencies to help people improve and maintain their mental health and well-being. Individual RCTs inform their own practice and specialties by drawing on innovative evidence-based methods spanning the range from somatic-based mind-body work, to techniques involving art, music and equine therapy. Registered Counselling Therapists provide mental health services to adults, adolescents, children, couples, families and groups. Counselling Therapists work in a wide range of settings such as mental health care clinics, healthcare facilities, community and government agencies, public and private school systems, community colleges, universities, correctional facilities, industrial sites, and private practice.

The [Entry-to-Practice Competency Profile](#) was adopted on the recommendation of the FRPA Review Office to assist the College with:

- Academic program approval/recognition
- Guidance for supervision
- Assessment of national and internationally educated applicants
- Reference for professional conduct matters
- Public and employer awareness of the practice expectations of RCTs

The [Counselling Therapists Act](#) provides Registered Counselling Therapists with title-protection, but does not restrict other healthcare professionals from performing the range of activities typically performed by Counselling Therapists.

To be eligible for registration/licensure with the College, applicants must hold a counselling-related master's degree (or equivalent), which involves academic course work and clinical practice training consisting of at least 120 hours of direct client contact. Following graduation, applicants are eligible to be licensed as a Registered Counselling Therapist – Candidate (RCT-C), which allows them to begin counselling independently under the oversight of an experienced and specifically trained Registered Counselling Therapist (RCT)

supervisor. The required candidacy period (internship) involves 2,000 hours of supervised practice with at least 800 hours of direct counselling with individuals and groups, typically extending over a 2-to-5-year period.

### **Types of Licenses**

The [Counselling Therapists Regulations](#) 5(1) provide for the issuing of 5 types of licence: 1) active-practicing; 2) active-practicing with conditions or restrictions; 3) active-practicing candidate; 4) temporary; and 5) temporary with conditions or restrictions. Applications are, however, only received for the active-practicing (i.e., Registered Counselling Therapist) and active-practicing candidate (i.e., Registered Counselling Therapist-Candidate) categories. The remaining categories are issued at the discretion of the Registrar. The current (December 31, 2020) active-practice registry stands at 372: RCT = 220; RCT-C = 152 (FRPA Annual Survey)

### **Website Link**

<https://nscct.ca/>



## II: 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 Office 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 NSCCT 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/describe, in detail, your registration/application requirements. Please include an overview of the process and a list of all documents (Examples: transcripts, certificates, job descriptions, articles, letters of support, and evaluations) that applicants are required to submit during the registration/application process. If your registration/application process is different for each license type, list the process for each license type in the chart included.

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

**RESPONDENT  
ANSWER**

**Explain the process of how the requirements for registration/application are to be met by an applicant (if different by licence/certification type, include an outline by each type).**

**Process Overview**

The main source for information about application requirements and how to apply, is provided through the website main-menu link [Register with the College](#). This page provides applicants a simple, easy-to-follow 4-step process for preparing required application materials, filling out necessary forms and submitting the application for, 1) RCT-C applicants (Canada, USA, and International), and CFTA transfer applicants.

In the preamble, applicants are made aware of several important practices related to the application process:

- Only fully completed applications will be reviewed
- Applicants will be notified if their applications are incomplete
- Incomplete applications will be held for pick-up for 14 days after notification before being destroyed
- Applicants will be notified of a decision within 60 days after receiving a complete application
- Applicants are encouraged to arrange documents to be sent early in the process
- All relevant policies and forms are hot-linked directly from this page
- Notice regarding applicants with physical or mental disabilities; encouragement to contact the EDR's office for assistance and a link to **Policy R-04.0 [Accommodation of Applicants with Physical or Mental Disabilities](#)**
- Applicants are encouraged to review all registration-related policies prior to beginning the process; with hotlink to the [Policy Suite](#) wherein all College policies can be easily located.

STEP-1 Find Your Application

This section of the page describes the licensing categories, i.e., Registered Counselling Therapist-Candidate (RCT-C), Registered Counselling Therapist (RCT), and CFTA Transfer. Applicants are asked to select the form from a list to match the licensing category for which they are applying. Each category listed is hot-linked directly to the required application form. Each form indicates all of the documentation required specific to that category of license.

STEP-2 Find a Supervisor

All RCT-C applicants must independently arrange supervision for their candidacy period by a College-approved supervisor. Here applicants are given a brief overview of that requirement as well as a link to **Policy SC-01.0 [Candidacy Supervision](#)** which describes the process in detail. To facilitate locating a suitable

supervisor, there is a link to **S-03.0** [Schedule of Approved Candidacy Supervisors](#) which contains the name, phone number and email of all practicing RCTs who are willing to act as supervisors and who have been previously vetted and approved by the College. Supervisor requirements are printed here as:

- Name must appear in the Active Practicing Roster of the College
- Must have a minimum 3 years post-candidacy counselling experience
- Must have completed candidacy supervision training as provided by the College (or approved equivalent)
- Has no prior or current dual relationship with the applicant (examples are provided)
- Has not less than \$1,000,000 liability insurance that covers supervision
- Indicated their willingness by signing the requisite section of the RCT-C application form
- Be approved by the Registrar/Registration Committee

#### STEP-3 Gather Your Documents

This section is a recap and final check that all required information and documentation required for each application has been readied and that documents from third-parties have been requested to be sent directly to the College. This list corresponds to the 'Application Checklist' located each application form. These items will be detailed immediately below under 'Required Application Documents'.

#### STEP-4 Submit Your Application

This final step provides the email and postal addresses to which the completed application and supporting material can be sent.

Once an application has been received, it is initially reviewed by the Administrative Coordinator to ensure its completeness and that all supporting documents have been received. The complete file is then reviewed in detail by the EDR and a provision decision is made. Finally, the file along with the recommendation of the EDR is presented to the Registration Committee at their monthly meeting for final review and disposition, i.e., approved/denied. If the application is approved, the Registrar allocates a Registration Number, enters the new registrant into the Active Practice Roster and the applicant is informed in writing by the Chair of the Registration Committee. If the application is denied, the applicant is advised in writing that they do not currently meet the requirements for registration; reasons are presented, including recommendations about what could be done to improve the application, and applicants are invited to reapply at any time. Rejected applicants are also informed of their right to appeal and presented with a copy of **Policy R-05.0** [Notice of Registration Decision and Right to Appeal](#) .

RESPONDENT ANSWER

Please provide the additional information in the grid below (if you have a published document, or even an associated policy, please provide the link to that published document/policy). Documents need to be provided for each license/certification type, if applicable.

OCCUPATION/LICENCE/CERTIFICATION TYPE (ONE ROW PER TYPE)	LIST OF REGISTRATION DOCUMENTS BY OCCUPATION/LICENCE/CERTIFICATION TYPE	LINK TO PUBLISHED DOCUMENT, IF APPLICABLE
<ul style="list-style-type: none"> <li>Registered Counselling Therapist – Candidate (Canada)</li> </ul>	<p>RCT-C applicants who have completed their graduate counselling degree in <u>Canada</u> must submit a completed form <b>F-02.0 <a href="#">Registered Counselling Therapist Candidate Application (Canada)</a></b> (which requires):</p> <p><u>Section A: Applicant Information</u></p> <ul style="list-style-type: none"> <li>Name, phone, email, date of birth and complete address</li> </ul> <p><u>Section B: Post-Secondary Education</u></p> <ul style="list-style-type: none"> <li>List of all Undergraduate Degrees Obtained (including institution, date of graduation, degree granted and major)</li> <li>List of all Graduate Degrees Obtained (including institution, date of graduation, degree granted and major)</li> <li>Official transcript from counselling graduate degree (sent directly to the College from the degree-granting institution)</li> </ul> <p><u>Section C: NSCCT Course Requirements</u></p> <ul style="list-style-type: none"> <li>If the applicant <u>has not</u> obtained their graduate counselling degree from a CACEP accredited graduate counselling program (<b>S-02.0 <a href="#">Schedule of CACEP Accredited Programs</a></b>) or a graduate counselling program pre-approved by the College, they must submit a completed <b>F-02.2 <a href="#">Course Description Form</a></b>, listing all</li> </ul>	<p><u>Each of the documents listed below are also hot-linked within the application form.</u></p> <ul style="list-style-type: none"> <li><b>Form F-02.0 <a href="#">Registered Counselling Therapist Candidate Application (Canada)</a></b> is a fillable, electronic form used by counselling graduates educated in Canada, to apply for a candidacy license (RCT-C).</li> <li><b>Form F-02.2 <a href="#">Course Description Form</a></b></li> <li><b>S-05.0 <a href="#">Schedule of Required Course Content</a></b></li> <li><b>Policy R-07.0 <a href="#">Evidence of Suitability to Practice</a></b></li> <li><b>Policy R-07.1 <a href="#">Criminal Record and Vulnerable Sector Checks</a></b></li> <li><b>Policy R-03.0 <a href="#">Acceptable Alternatives to Required Application Documents</a></b></li> <li><b>Policy SC-01.0 <a href="#">Candidacy Supervision</a></b></li> <li><b>Schedule S-02.0 <a href="#">Schedule of CACEP Accredited Programs</a></b></li> <li><b>Schedule S-03.0 <a href="#">Schedule of approved Candidacy Supervisors</a></b></li> <li><b>Schedule S-01.0 <a href="#">Schedule of Fees</a></b></li> <li><b>Policy R-02.0 <a href="#">Professional Liability Insurance</a></b></li> </ul>

graduate-level courses obtained as part of the degree, and which appear on official transcripts. Courses listed must match the content requirements outlined in **S-05.0** [Schedule of Required Course Content](#)

Section D: Application Fee

- Payment of the \$110 (Can) application fee via e-transfer or by cheque/money order

Section E: Proposed Candidacy Supervisor

- The name, phone, email, registration number and full address of a proposed candidacy supervisor who meets the criteria established in **SC-01.0** [Candidacy Supervision](#), and who has signed the application indicating their intent to supervise the candidate.

Section F: Declaration and Attestation

- Signed declaration that the applicant has not been the subject of any disciplinary process
- Signed attestation of having read and expressing their willingness to abide by the [Standards of Practice](#) and [Code of Ethics](#) adopted by NSCCT.

Section G: Professional Liability Insurance

- Evidence that the applicant (or their employer on their behalf) holds no less than \$1,000,000 of professional liability insurance

Application Checklist

		<p>A review check-list confirming that all required supporting documents are attached or being sent by third-parties.</p> <ul style="list-style-type: none"> <li>• Criminal Record Check (<b>Policy R-07.1</b>)</li> <li>• Vulnerable Sector Check (<b>Policy R.07.1</b>)</li> <li>• Proof of Professional Liability Insurance</li> <li>• Application Fee</li> <li>• Graduate Course Descriptions (if required)</li> </ul> <p><u>Certification/Signature</u></p> <ul style="list-style-type: none"> <li>• Certification that all information submitted for application purposes is true.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Registered Counselling Therapist</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Policy R-10.0</b> <a href="#">Transfer of Registration Category (RCT-C to RCT)</a> provides that all RCT-Cs who have successfully completed their supervised candidacy period (see <b>Policy SC-01.0</b> <a href="#">Candidacy Supervision</a>) may apply to transfer their registration category to RCT by completing <b>Form F-06.0</b> <a href="#">Transfer of Registration Category Form</a> (which requires):</li> </ul> <p><u>Applicant Information</u></p> <ul style="list-style-type: none"> <li>• Name, phone, email, date of birth, complete address, and RCT-C Registration number</li> </ul> <p><u>Completion of Candidacy Period</u></p> <ul style="list-style-type: none"> <li>• Applicants are asked to confirm that they have completed: <ul style="list-style-type: none"> <li>- 2000 hrs total counselling time</li> <li>- 800 hrs direct client contact time</li> <li>- 50 hrs of direct supervision</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Policy R-10.0</b> <a href="#">Transfer of Registration Category (RCT-C to RCT)</a></li> <li>• <b>Form F-06.0</b> <a href="#">Transfer of Registration Category Form</a></li> <li>• <b>Policy SC-01.0</b> <a href="#">Candidacy Supervision</a></li> <li>• <b>Schedule S-01.0</b> <a href="#">Schedule of Fees</a></li> <li>• <b>Policy R-06.0</b> <a href="#">Licensure and Registration Year</a></li> </ul>

	<ul style="list-style-type: none"> <li>Supervisors submit signed progress reports and record of hours completed at regular intervals during the candidacy period (at 20, 35 and 50 hrs of direct supervision). These are maintained by the College, and used by the Registration Committee to confirm compliance; therefore, supervisor signatures are not required on this form.</li> <li>must have on file, a record of all completed candidacy hours as certified by their approved supervisor</li> </ul> <p><u>Section C: Payment of Transfer Fee</u></p> <ul style="list-style-type: none"> <li>Applicant must submit the transfer fee of \$50 by e-transfer, cheque or money order (see <b>S-01.0</b> <a href="#">Schedule of Fees</a>)</li> </ul> <p><u>Section D: Payment of New Category Registration Fee</u></p> <ul style="list-style-type: none"> <li>Applicant must submit the pro-rated amount covering the difference in fees that result from the transfer of license categories for the remainder of the registration year (see <b>S-01.0</b> <a href="#">Schedule of Fees</a> and <b>Policy R-06.0</b> <a href="#">Licensure and Registration Year</a>)</li> </ul> <p><u>Certification/Signature</u></p> <ul style="list-style-type: none"> <li>Certification that all information in the application is true.</li> </ul>	
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<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides applicants with information about their registration practices, including the registration process and documents that applicants are required to submit during the process; and</li> <li>• the respondent's answer describes the registration requirements and the process for meeting them.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> provide applicants with information about their registration practices, specifically, the registration process and documents that applicants are required to submit during the process; or</li> <li>• the respondent's answer does <i>not</i> describe the registration process and the process for meeting them.</li> </ul>		
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>		



## QUESTION 2

How is the registration/application process communicated to the applicant?

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

### RESPONDENT ANSWER

**Select all that apply:**

- Paper (hard copy) in the form of a fact sheet/pamphlet or handbook
- Available online to download (in the form of a fact sheet/pamphlet or handbook in PDF or another format)
- Email
- Website
- Other: **explain your communication process if not listed above:** Although readily available on the website in downloadable PDF version, prospective applicants who inquire to the College will be sent email or paper versions of the application process, requirements and forms. See web page ‘Register with the College’ found on the main menu of the website and linked here The EDR and Administrative Coordinator also routinely answer questions that potential applicants may have.

### COMPLIANCE CRITERIA

**Compliant:**

- The regulating body makes requirements for registration available to applicants (they select at least 1 response option); and
- the respondent’s answer describes how the requirements for registration are made available to applicants.

**Not compliant:**

- The regulating body does *not* make requirements for registration available to applicants (they do not select any response options); or
- the respondent’s answer does *not* describe how the requirements for registration are made available to applicants.

<b>REVIEW FINDINGS</b>	<b>To be completed by the FRPA Review Office:</b>  <input checked="" type="checkbox"/> Compliant  <input type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>

### QUESTION 3

Is the registration/application process different for applicants who have received their qualifications (Example: education, experience, etc.) outside of Canada? If so, is the different registration/application process documented? Provide a link to the published document, if applicable. (Example: online)

Alignment with FRPA: *Sections 3, 6, 7(a through f) and 16(3)(a)*

<b>RESPONDENT ANSWER</b>	<b>Please provide information in the chart below, with a separate answer per licence/certification type:</b>				
	<b>LICENSE TYPE</b>	<b>YES/NO</b>	<b>IF YES, EXPLAIN THE DIFFERENCE</b>	<b>PROCESS DOCUMENTED YES/NO</b>	<b>LINK TO PUBLISHED DOCUMENT, IF APPLICABLE</b>
	<ul style="list-style-type: none"> <li>Registered Counselling Therapist-Candidate Applicants from outside of Canada or the United States</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> </ul>	<ul style="list-style-type: none"> <li><b>Policy R-09.0 0 <a href="#">Licensure of Internationally Licensed Applicants Not Currently Licensed in Canada</a></b> states that: "...having met the requirements for registration... applicants who hold licensure in jurisdictions outside of Canada will be licensed in the category recommended by the Registrar and ratified by the Registration Committee."</li> <li>International applicants must submit a completed <b>Form F-05.0 (International)</b> (which requires the following information and supporting documents):</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> </ul>	<ul style="list-style-type: none"> <li><b>Policy R-09.0 <a href="#">Licensure of Internationally Licensed Applicants Not Currently Licensed in Canada</a></b></li> <li><b>Form F-05.0 <a href="#">Registered Counselling Therapist Application (International)</a></b> is a fillable, electronic form used by counselling graduates educated outside of Canada or the United States to apply for a candidacy license (RCT-C).</li> </ul>

	<p>(Referred to here as “International Applicants”).</p>	<p><u>Section A: Applicant Information</u></p> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)</li> </ul> <p><u>Section B: Post-Secondary Education</u></p> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)</li> <li>• <u>Plus</u>, credential evaluation by any one of 5 services included in <b>S-04.0</b> <a href="#">Schedule of Approved Credential Evaluation Services</a> (which is linked from the application form)</li> </ul> <p><u>Section C: NSCCT Course Requirements</u></p> <ul style="list-style-type: none"> <li>• <u>All</u> International applicants must submit a completed <b>F-02.2</b>, <a href="#">Graduate Course Description Form</a>, listing all graduate-level courses obtained as part of the degree, and which appear on official transcripts. Courses listed must match the content requirements outlined in <b>S-05.0</b> <a href="#">Schedule of Required Course Content</a></li> </ul> <p><u>Section D: Application Fee</u></p> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada) <u>but</u> the method of payment accepted is limited to e-transfer or International Wire Transfer</li> </ul> <p><u>Section E: Proposed Candidacy Supervisor</u></p> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)</li> </ul> <p><u>Section F: Declaration and Attestation</u></p> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)</li> </ul>		<ul style="list-style-type: none"> <li>• <b>Form F-02.0</b> <a href="#">Registered Counselling Therapist Candidate Application (Canada)</a></li> <li>• <b>S-04.0</b> <a href="#">Schedule of Approved Credential Evaluation Services</a></li> <li>• <b>F-02.2</b> <a href="#">Graduate Course Description Form</a></li> <li>• <b>S-05.0</b> <a href="#">Graduate Course Content Requirements</a></li> <li>• <b>Policy R-09.1</b> <a href="#">English proficiency Requirements for Internationally Educated Applicants</a></li> </ul> <p>An overview of the process can be found at <a href="#">Applying from Outside of Canada</a></p>
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			<ul style="list-style-type: none"> <li>• Plus a 50 question multiple-choice ethics exam F-05.0 and R-09.0</li> </ul> <p><u>Section G: English Language Proficiency</u></p> <ul style="list-style-type: none"> <li>• This section of the application outlines the requirements for English language skills as follows: "...Internationally educated applicants whose first language is not English, must provide independent evidence of an English language proficiency score (IELTS, TOEFL, CAEL, or PTE Academic) that meets the minimum standard outlined in <b>Policy R-09.1</b> <a href="#">English proficiency Requirements for Internationally Educated Applicants</a>" (linked from app). There is mention on the application of exempt countries, and the full list is provided in <b>R-09.1</b></li> </ul> <p><u>Section H: Professional Liability Insurance</u></p> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada).</li> </ul> <p><u>Application Checklist</u></p> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada) <u>but</u> with the addition of English language proficiency score</li> </ul> <p><u>Certification/Signature</u></p> <ul style="list-style-type: none"> <li>• <b>Same as F-02.0</b> (Canada)</li> </ul>		
	<ul style="list-style-type: none"> <li>• Registered Counselling Therapist-Candidate Applicants from the United States</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Policy R-09.2</b> <a href="#">Licensure of Applicants Educated in the United States Not Licensed in Canada</a> states that, "To become registered with NSCCT, applicants from the United States must hold a graduate degree in counselling or a related profession from a regionally accredited institution... and meet all other NSCCT registration</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Policy R-09.2</b> <a href="#">Licensure of Applicants Educated in the United States Not Licensed in Canada</a></li> </ul>

	<ul style="list-style-type: none"> <li>(Referred to here as “U.S. Applicants”).</li> </ul>		<p>criteria.” There is a link to R-09.2 and a list of the 7 regional accreditors on the corresponding application form <b>F-04.0 0 Registered Counselling Therapist Candidate Application (United States)</b></p> <ul style="list-style-type: none"> <li>U.S. applicants must submit a completed <b>Form F-04.0 0 Registered Counselling Therapist Candidate Application (United States)</b> (which requires the following information and supporting documents):</li> </ul> <p><u>Section A: Applicant Information</u></p> <ul style="list-style-type: none"> <li>Same as <b>F-02.0 (Canada)</b></li> </ul> <p><u>Section B: Post-Secondary Education</u></p> <ul style="list-style-type: none"> <li>Same as <b>F-02.0</b></li> <li><u>Plus</u>, enter the regional accreditation body</li> </ul> <p>Note: U.S. applicants are informed by <b>Policy R-09.0</b> that in cases where the Registrar/Registration Committee is unsure of the authenticity or equivalence of a component of the applicant’s education, the applicant may be asked to provide a report from one of the approved credential services listed in <b>S-04.0 0 Schedule of Approved Credential Evaluation Services</b> at their own expense.</p> <p><u>Section C: NSCCT Course Requirements</u></p> <ul style="list-style-type: none"> <li>Same as <b>F-05.0 (International)</b></li> </ul> <p><u>Section D: Application Fee</u></p> <ul style="list-style-type: none"> <li>Same as <b>F-02.0 (Canada)</b></li> </ul> <p><u>Section E: Proposed Candidacy Supervisor</u></p>		<ul style="list-style-type: none"> <li><b>F-04.0</b> <a href="#">Registered Counselling Therapist Candidate Application (United States)</a></li> <li><b>S-04.0</b> <a href="#">Schedule of Approved Credential Evaluation Services</a></li> </ul>
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			<ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)_</li> </ul> <u>Section F: Declaration and Attestation</u> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)</li> </ul> <u>Section G: Professional Liability Insurance</u> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada).</li> </ul> <u>Application Checklist</u> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)</li> </ul> <u>Certification/Signature</u> <ul style="list-style-type: none"> <li>• Same as <b>F-02.0</b> (Canada)</li> </ul>		
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<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer indicates whether a registration/application process is different (response = “yes” or “no”).</li> <li>• If there are any differences in the registration/application process for applicants who have received their qualifications outside of Canada (response = “yes”), the respondent describes those differences.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer does <i>not</i> indicate whether a registration/application process is different (no response, either “yes” or “no”).</li> <li>• If there are any differences in the registration/application process for applicants who have received their qualifications outside of Canada (response = “yes”), the respondent’s answer does <i>not</i> describe the differences.</li> </ul>				
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>				

#### QUESTION 4

Is the registration/application process different for individuals who are registered in another Canadian province/territory?

Alignment with FRPA: *Sections 3, 6, 7(a through f) and 16(a)*

RESPONDENT ANSWER	Please provide a separate answer per license/certification type:		
	LICENSE TYPE	YES/NO	IF YES, EXPLAIN THE DIFFERENCE
	<ul style="list-style-type: none"> <li>Registered Counselling Therapist</li> </ul>	<ul style="list-style-type: none"> <li>Yes).</li> </ul>	<ul style="list-style-type: none"> <li><b>Policy R-08.0</b> <a href="#">Licensure of Applicants Currently Licensed in Canadian Jurisdictions Outside of Nova Scotia</a> outlines the requirements for CFTA transfers from the other 3 regulated Canadian jurisdictions (i.e., New Brunswick, Ontario and Quebec).  The difference is that in the case of CFTA transfer applicants, several of the standard application requirements have been eliminated in order to respect the provisions of the CFTA and focus documentation on confirming current licensure and on objective measures of suitability to practice (See <b>Policy R-07.0</b> <a href="#">Evidence of Suitability to Practice</a> and <b>Policy R-07.1</b> <a href="#">Criminal Record and Vulnerable Sector Checks</a>). The following are not required:               <ul style="list-style-type: none"> <li>Undergraduate Degrees Obtained</li> <li>Graduate Degrees Obtained</li> <li>Official Transcripts</li> <li>Course Content Description Form</li> <li>Proposed Candidacy Supervisor</li> </ul> </li> <li><b>Policy R-08.0 0</b> <a href="#">Licensure of Applicants Currently Licensed in Canadian Jurisdictions Outside of Nova Scotia</a> states:  “Applicants currently licensed by another Canadian jurisdiction will be licensed to practice in Nova Scotia upon receipt of the following:               <ul style="list-style-type: none"> <li>A copy of the Applicant’s current license;</li> <li>Written confirmation from the Registrar of the licensing body under which the Applicant is currently licensed, that the applicant is a member in good standing and is not the subject of any unresolved disciplinary matters and that there are no previous, current or pending sanctions or licensing restrictions imposed upon or due to be imposed on the Applicant;</li> <li>Criminal Record Check (municipal police or RCMP);</li> <li>Vulnerable Sector Check (municipal police or RCMP);</li> <li>Application fee (see <b>S-01.0</b> <a href="#">Schedule of Fees</a>); Currently \$110</li> </ul> </li> </ul>



		<ul style="list-style-type: none"> <li>The annual NSCCT registration fee for the relevant category (see Schedule of Fees);</li> <li>Evidence of professional liability insurance policy coverage of \$1,000,000 minimum.”</li> </ul> <p>Applicants in this category are required to submit <b>Form F-03.0</b> <a href="#">Application for Transfer of License to NS Under CFTA</a></p>
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<ul style="list-style-type: none"> <li>Registered Counselling Therapist- Candidate</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> </ul>	<ul style="list-style-type: none"> <li><b>Policy R-08.0 0</b> <a href="#">Licensure of Applicants Currently Licensed in Canadian Jurisdictions Outside of Nova Scotia</a> and <b>Form F-03.0</b> are applied as in the case of Registered Counselling Therapists (above) <u>except</u> that the requirement to indicate a Proposed Candidacy Supervisor remains.</li> </ul> <p><b>Policy R-08.0 0</b> <a href="#">Licensure of Applicants Currently Licensed in Canadian Jurisdictions Outside of Nova Scotia</a> states: “Having met these requirements, Applicants who hold licensure in other Canadian jurisdictions will be licensed <u>in the equivalent category</u> in Nova Scotia.</p>
•	•	•
<ul style="list-style-type: none"> <li>Non-registered/licensed Applicants Educated Outside of Nova Scotia</li> </ul>	<ul style="list-style-type: none"> <li>No</li> </ul>	<ul style="list-style-type: none"> <li>NSCCT makes <u>no</u> distinction between non-registered/licensed applicants who have received their education in areas of Canada outside of Nova Scotia, and non-registered/licensed applicants who have received their education inside the Province.</li> </ul> <p>Both are required to apply as RCT-Candidates using <b>Form F-02.0 0</b> <a href="#">Registered Counselling Therapist Candidate Application (Canada)</a> and meet the requirements indicated on the form and published on the NSCCT website under the ‘Register with the College’ link here</p>
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	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer describes a registration/application process, that is aligned with the CFTA, for applicants who have received their qualifications or are already registered outside of Nova Scotia.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer describes a registration/application process, that is <i>not</i> aligned with the CFTA, for applicants who have received their qualifications or are already registered outside of Nova Scotia.</li> </ul>		
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>		

### QUESTION 5

Are there fees attached to the registration/application process? If so, how is this information communicated to the applicant? (Example: information available on website, paper form, email)

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

<b>RESPONDENT ANSWER</b>	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <b>If yes, explain the process of how this information is communicated.</b>  <p><b>Policy R-01.0 <a href="#">Schedule of Fees</a></b> is posted on the NSCCT Website and is accessible through several internal links. The application fees are printed twice on all application forms; once in the body of the forms and once on the ‘checklist’ portion at the end. The registrar and administrative coordinator routinely respond directly to enquiries by phone or email and provide application fee information as requested.</p> <p><b>Insert a website link of where this information is communicated, if applicable.</b></p> <p><a href="#">Schedule of Fees</a></p> <p><b>Provide the fee for the registration/application process (linked to your piece of the registration/application process only), as of the date this review is completed.</b></p> <p>The application fee for RCT-C is \$110 CAN. The application fee for RCT transfer is \$110. CAN. The application for Transfer of Registration Category (RCT-C to RCT) is \$50 CAN.</p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides applicants with information on any fees for registration; and</li> <li>• the respondent’s answer states any fees charged for registration, even if the fees are not applicable or \$0.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> provide applicants with information on any fees for registration; or</li> <li>• if fees are charged for registration, even if the fees are not applicable or \$0, the respondent’s answer does <i>not</i> state the fees.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</b></p> <input checked="" type="checkbox"/> Compliant  <input type="checkbox"/> Not compliant

<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>
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**QUESTION 6**

Do you have a process to accept alternative information when the required documents cannot be obtained by the applicant, for reasons beyond their control (Example: a sworn statement in lieu of full documentation)?

Alignment with FRPA: *Sections 7(f), 9(b) and 16(3)(d)*

<b>RESPONDENT ANSWER</b>	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <p><b>If yes, please explain the process:</b></p> <p><b>Policy R-03.0 <a href="#">Acceptable Alternatives to Required Application Documents</a></b> outlines in detail, the steps an applicant must follow to request consideration of alternative documents or other information in support of their application. The policy lists specific alternative information that is acceptable to the Registration Committee under the categories of ‘Educational Credentials’ and ‘Professional Qualifications’. It is also clearly stated in the policy that the Registration Committee will also evaluate “Any other information offered by the Applicant evincing their academic and credentials/professional qualifications.” The policy also highlights that “the College will work with the Applicant to determine acceptable alternative information...” The policy also clearly states that applicants are responsible for all costs associated with obtaining and submitting alternative evidence.</p> <p><b>Process:</b> The process begins when an applicant who cannot provide some or all of the required documentation makes a request in writing to the registrar. Applicants are asked to include as part of their request: 1) a list of the required documents that cannot be provided; 2) reasons the applicant is unable to produce the required documents; 3) what attempts have been made to date by the applicant to obtain the required documents; 4) a description of the documents the applicant is able to provide; and, 5) written permission of the applicant allowing the College to enlist third parties in obtaining information to verify the applicants qualifications and credentials. <b>Policy R-03.0 <a href="#">Acceptable Alternatives to Required Application Documents</a></b> provides applicants with a list of 7 alternative types of information that the College will consider in assessing the applicant’s <u>educational credentials</u>:</p> <ul style="list-style-type: none"> <li>• Certified copies of original documentation</li> <li>• Photocopies of academic documentation together with an affidavit attesting to the authenticity of the document</li> </ul>
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	<ul style="list-style-type: none"> <li>• An affidavit from the applicant describing the applicant’s academic credentials, the institution attended, and detailed descriptions of the overall curriculum and courses taken, with supporting evidence if possible</li> <li>• Affidavits from former professors and classmates verifying the applicant’s course descriptions and attesting to the applicant’s academic performance</li> <li>• Affidavits from former professors, classmates and clinical supervisors, verifying the type and duration of supervised clinical practice the applicant completed as part of the training program</li> <li>• Information obtained by the College from third parties, with the applicant’s consent, verifying the applicant’s educational credentials</li> <li>• Any other information offered by the applicant evincing their academic qualifications and credentials</li> </ul> <p>Likewise, the policy provides applicants with a list of 5 alternatives for assessing <u>professional qualifications</u>.</p> <ul style="list-style-type: none"> <li>• Reference letters from prior employers, colleagues, and licensing bodies</li> <li>• An affidavit from the applicant describing the applicant’s professional qualifications and detailed descriptions of prior work performed, with supporting evidence if possible</li> <li>• Statements of professional standing with other regulatory bodies</li> <li>• Certified copies of licences or certificates</li> <li>• Any other information offered by the applicant evincing their professional qualifications</li> </ul> <p>Once acceptable alternative documents are produced, the registration process begins as with any other applicant.</p> <p>Applicants are informed that all costs associated with providing acceptable alternative documents (including verified English language translation) are their responsibility.</p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body advises applicants on alternative information that applicants may provide when they cannot obtain documentation of their qualifications for reasons beyond their control; and</li> <li>• the respondent’s answer describes any such alternative information.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> advise applicants on alternative information that applicants may provide when they cannot obtain documentation of their qualifications for reasons beyond their control; or</li> <li>• the respondent’s answer does <i>not</i> describe the alternative information.</li> </ul>
<b>REVIEW FINDINGS</b>	<b>To be completed by the FRPA Review Office:</b>

	<input checked="" type="checkbox"/> Compliant  <input type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>

<b>QUESTION 7</b>	
Do you provide any support to applicants during the registration/application process (Examples: coaching, referrals, explanation of registration requirements)?  Alignment with FRPA: <i>Sections 7(e) and 16(3)(k)</i>	
<b>RESPONDENT ANSWER</b>	<input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> When required  <b>If yes or when required, what types of support are provided to applicants during the registration/application process?</b> Both the registrar and administrative coordinator routinely respond to calls and emails from applicants, at which time they provide any information required to facilitate the application process. The Administrative Coordinator often provides continuous individualized assistance by phone or email to applicants when required.
<b>COMPLIANCE CRITERIA</b>	<b>Compliant:</b> <ul style="list-style-type: none"> <li>The respondent's answer includes information about any support they provide to applicants during the registration process.</li> </ul> <b>Not compliant:</b> <ul style="list-style-type: none"> <li>The respondent's answer does <i>not</i> describe any support they provide to applicants during the registration process.</li> </ul>

<b>REVIEW FINDINGS</b>	<b>To be completed by the FRPA Review Office:</b>  <input checked="" type="checkbox"/> Compliant  <input type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>

## QUESTION 8

Do you have a policy and/or process on how to work with an applicant during the registration/application process that may have a physical or mental disability and requires an accommodation when registering/applying? If applicable, please provide a link to your policy and/or process. This is for the registration/application process only and not a workplace accommodation.

Alignment with FRPA: *Section 16(3)(h)*

**Note:** A physical or mental disability includes any persons with a disability (consisting of a physical, cognitive, or mental impairment), that presents a persistent barrier to securing and/or retaining work. For more information visit the following links to the applicable Government of Nova Scotia legislation:

[https://nslegislature.ca/legc/bills/62nd\\_3rd/3rd\\_read/b059.htm](https://nslegislature.ca/legc/bills/62nd_3rd/3rd_read/b059.htm)

<https://nslegislature.ca/sites/default/files/legc/statutes/human%20rights.pdf>

Examples of accommodations for this purpose can include, but is not limited to:

- Assistance in completing application forms
- Provision of additional time provided to complete exams
- Provision of an application in braille
- Provision of audio-visual equipment
- In person meetings/interviews/hearings
- Other accommodations such as paper color, larger font, etc.

<b>RESPONDENT ANSWER</b>	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> N/A  <b>If yes, provide a description of the policy/process? (if you have a link to a published policy/process, please include in your response)</b>  <p><b>Policy R-04.0 <a href="#">Accommodation of Applicants with Physical or Mental Disabilities</a></b> outlines the NSCCT’s “commitment to ensuring an equitable application process.” Examples from the policy include: assistance in completing application forms, alternate methods of communication, alternate time/locations of meetings or exams, additional time for exams, transmission assistance (e.g., reader, recorder, ASL, software and translation). The policy makes it clear that accommodation is <u>not</u> limited to the examples provided, and that the Registrar “will work with the Applicant to determine a reasonable accommodation.”</p> <p><b>Process:</b> Requests for accommodation are made to the registrar, and must include: 1) the nature of the disability; 2) the type of accommodation requested; and, 3) where available, a description of accommodations the applicant may have received in the past. Depending on the nature of the disability and the accommodation requested, the registrar may ask for additional evidence to support their request (e.g., medical diagnosis, documentation explaining the need for the particular accommodation, etc.).</p> <p>To avoid inappropriate disclosure of personal health information, all documentation and notes pertaining to the accommodation request are kept in a separate coded file.</p> <p><b>If no, what would the process be if an accommodation were to be required?</b></p> <p><b>If N/A, please explain why this is not applicable to your registration/application process / practices?</b></p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer includes a description of any existing accommodation policies for applicants with a physical or mental disability.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer does <i>not</i> describe any existing accommodation policies/processes for applicants with a physical disability or mental disability.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</b></p> <input checked="" type="checkbox"/> Compliant



	<input type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>

### QUESTION 9

Is your accommodation policy and/or process adaptable if a new situation arises? (Example: translation was not covered in the policy, but a request for an alternate language was requested)

Alignment with FRPA: *This is to provide additional information and identify if there are areas that the FRPA Review Officer may be able to assist, if applicable*

#### RESPONDENT ANSWER

Yes

No

**If yes, explain how and what steps would be taken to adapt this policy.**

**Policy R-04.0 [Accommodation of Applicants with Physical or Mental Disabilities](#)** begins with a broad statement of the College’s commitment to accommodating applicants, “To facilitate licensure, the NSCCT will make all reasonable efforts to accommodate applicants who require additional supports in the process.” The intention of this statement is to ensure applicants and the public, that the College is not constrained by the example accommodations provided in the policy. For example, the policy mentions ASL interpretation as a possible accommodation but does not mention the possibility of braille documents; however, the College is quite willing to work on accommodations for a visually impaired applicant.

**Process:** When a novel accommodation is requested, the registrar works with the applicant to investigate the exact requirements and feasibility of the required accommodation. This is in large part why the Policy asks applicants requesting accommodations to provide “where available, a description of accommodations the applicant may have received in the past.”

**If no, what would occur with that applicant if the policy/process could not be adapted?**

<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• NA</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• NA</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</b></p> <p><input type="checkbox"/> NA</p> <p><input type="checkbox"/> NA</p>
<b>COMMENTS: REVIEW FINDINGS</b>	<p><b>Comments, to be completed by the FRPA Review Office:</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 10

Are the criteria for meeting the requirements of registration/application documented? (Examples: exam marks, work experience requirements). If a third-party assessor is used for assessment, please describe their role in the space provided.

Alignment with FRPA: *Sections 16(3)(b) and 16 (3)(i)*

RESPONDENT  
ANSWER

Yes

No

**If yes, how/where is this documented (Example: in an internal policy)?**

The [Register with the College](#) page of the College website provides information about all required application documents; directly and via links to relevant policies, schedules and forms. The application forms themselves contain information about requirements and supporting documents; and the forms link to policies all relevant policies. Several policies provide greater detail about all requirements, particularly in regard to applications that the College sees less frequently, or in cases where the applicants are likely to be less familiar with our process, and where language comprehension might be a potential barrier to access. For example, CFTA Transfer Applicants (**Policy R-08.0** [Licensure of Applicants Currently Licensed in Canadian Jurisdictions Outside of Nova Scotia](#)); International Applicants (**Policy R-09.0** [Licensure of Internationally Licensed Applicants Not Currently Licensed in Canada](#)) and, U.S. applicants (**Policy R-09.2** [Licensure of Applicants Educated in the United States Not Currently Licensed in Canada](#)). The [Entry-to-Practice Competency Profile \(R-00.0\)](#) is displayed on the website, and linked from the [Register with the College](#) page in order to assist the [Registration Committee](#) (and the applicants) in assessing knowledge and skills in comparison to those expected of a Counselling Therapist practicing in Nova Scotia.

The criteria the College uses for assessing whether an applicant meets registration requirements has been purposefully re-designed to reduce subjectivity and bias. All major components of the application can be assessed in a binary fashion, i.e., either an applicant has them or they do not. For example, an applicant's transcript is directly compared to the required content elaborated in **S-05.0** [Schedule of Required Course Content for RCT-C Applicants](#). Less straight-forward (potentially more subjective) requirements, such as the evaluation of "suitability to practice" also now rely only on objective measures (see **Policy R-07.0** [Evidence of Suitability to Practice](#)). In a related example, to evaluate positive criminal record and vulnerable sector checks, the EDR and [Registration Committee](#) use a number of "best-practices" criteria such as, the nature, number and extent of the offence(s), and the time elapsed between conviction and application. These criteria help inform the assessment of risk to the public and the decision to approve or reject an applicant. (See **Policy R-07.1** [Criminal Record and Vulnerable Sector Checks](#)) These are all readily accessible to applicants on the website and through an email or phone call.

Having graduated from a CACEP accredited program [Schedule S-02.0](#) is used as a criterion for fast-tracking applications. The major measuring tool assess eligibility for movement from the RCT-C category of registration to the RCT category is the Candidacy Supervision process as outlined in [Policy SC-01.0](#). English language proficiency is gaged by the established benchmarks in [Policy R-09.1](#) as a criterion specific to international applicants from outside of the United States. Familiarity with, and commitment to the CCPA *Code of Ethics* and *Standards of Practice* Canadian and U.S. is assessed by attestation ([F-02.0](#) and [F-04.0](#)) and for international applicants by attestation and exam evidence ([Policy R-09.0](#)). Theses are all functions of the [Registration Committee](#).

**If there is a third-party assessor utilized in the process, briefly describe the role of that assessor:**

The College requires third-party assessment for, 1) applicants from countries other than Canada or the United States, [**Policy R-09.0** [Licensure of Internationally Licensed Applicants Not Currently Licensed in Canada](#)], and, 2) applicants from the United States upon request of the Registrar/Registration

	<p>Committee (in cases when credentials/qualifications present assessment difficulties or if there are questions of authenticity); <b>Policy R-09.2 <a href="#">Licensure of Applicants Educated in the United States Not Currently Licensed in Canada</a></b> states, “If required by the Registrar/Registration Committee, applicants may be asked to provide third-party credential assessment and document verification provided by one of the accepted agencies listed in <b>Schedule S-04.0 <a href="#">Schedule of Approved Credential Assessment Services</a></b>.” This schedule lists the 5 services (including links to each) affiliated with the <a href="#">Alliance of Credential Evaluation Services of Canada</a> (ACESC). Applicants are also clearly informed that all costs associated with the use of a third-party assessor are their responsibility.</p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer describes how/where the criteria for meeting the requirements of registration/application are documented; and</li> <li>• the respondent’s answer describes the role of any third-party assessors.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent’s answer <i>does not</i> describe how/where the criteria for meeting the requirements of registration/application are documented; or</li> <li>• if a third party is used for assessment, the respondent’s answer <i>does not</i> describe the role of the third-party assessors.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>

**QUESTION 11**

How are the criteria that you use to assess the requirements for registration/application made available to applicants?

Alignment with FRPA: *Section 7(a) and (d)*

<b>RESPONDENT ANSWER</b>	<p><b>Select all that apply</b></p> <p><input type="checkbox"/> Paper (hard copy) in the form of a fact sheet/pamphlet or handbook</p> <p><input type="checkbox"/> Available online to download (in the form of a fact sheet/pamphlet or handbook in PDF or another format)</p> <p><input checked="" type="checkbox"/> Email</p> <p><input checked="" type="checkbox"/> Website</p> <p><input type="checkbox"/> Other, <b>explain your communication process if not listed above:</b> This is done primarily through the ‘Register with the College’ page and associated policies, schedules and forms hot-linked to the page. Requests by potential applicants who wish to receive the information by other means and to communicate directly throughout with the EDR or Administrative Coordinator are readily accommodated.</p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides applicants with a description of the criteria used to assess whether they meet the requirements for registration (they select at least 1 response option).</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> provide applicants with a description of the criteria used to assess whether they meet the requirements for registration (they do not select any response options).</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>

## QUESTION 12

Do you have a process for providing the reason(s) why a registration/application is not approved?

Alignment with FRPA: *Sections 8(c) and 10(3)*

<b>RESPONDENT ANSWER</b>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><b>If Yes, explain the process (Example: written decision, provision of information about the appeal process, etc.):</b></p> <p><b>Policy R-05.0. <a href="#">Notice of Registration Decision and Right to Appeal</a></b>, states that applicants have a right to “timely notice of registration decisions including a written summary of reasons for the decision, and notice of the right to appeal.” The Registration Committee utilizes an adapted version of the Nova Scotia Regulated Health Professions Network (NSRHPN) document “Tips for Writing Reasons” as a guide to writing clear reasons for application decisions. Rejection letters also contain information specifying what information or action could make the application acceptable (in some cases the letter will include a suggested resource to assist them in satisfying missing criteria (See for example, <b>Policy R-11.0 <a href="#">Practicum Bridging and Supplemental Candidacy Hours</a></b>). Rejection letters always contain information on the right to appeal and a copy of <b>Policy R-05.0. <a href="#">Notice of Registration Decision and Right to Appeal</a></b>. A redacted sample of an application rejection letter from the Chair of the Registration Committee can be found <a href="#">here</a></p> <p><b>If No, explain why not (Example: registration/applications are always approved, only provided when requested, etc.):</b></p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"><li>• The regulating body provides applicants who are not granted registration with a written decision that includes the reason(s) why.</li></ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"><li>• The regulating body does <i>not</i> provide applicants who are not granted registration with a written decision that includes the reason(s) why.</li></ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b>
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**QUESTION 13**

Do you provide supports/referrals/information to unsuccessful applicants after a decision has been communicated to the applicant? (Examples: referrals to education institutions to gain additional credentials, bridging programs, etc.)?

Alignment with FRPA: *Sections 8(d) and 16(3)(k)*

<b>RESPONDENT ANSWER</b>	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <p><b>If yes, what types of supports/referrals/information do you provide to unsuccessful applicants after a decision has been communicated?</b></p> <p>Along with the reasons for a decision to deny an application, all letters informing applicants of the decision provide some level of advice on how to address lacuna. For example, the College requires that all applicants provide evidence of having taken a graduate-level course in Professional Ethics (or equivalent). It is not uncommon, particularly among foreign-trained applicants to not have a suitable course on their transcript. We have researched a number of options for on-line or self-study delivery of acceptable courses and routinely direct applicants toward them (See the sample letter also linked to Question 12 <a href="#">here</a>).</p> <p>In the 2019 FRPA Report, it was suggested to the College that the existing ‘bridging program’ to help applicants gain the number of practicum hours required for registration as an RCT-C was problematic in a number of ways and that it should either be, 1) discontinued entirely, or 2) substantially revised. After a great deal of consternation and discussion, the College decided to take a new approach. This involved the development of <b>Policy R-11.0 <a href="#">Practicum Bridging and Supplemental Hours</a></b>. To facilitate the policy, the College was able to negotiate a Memorandum of Agreement with Acadia University which will allow applicants without sufficient practicum hours, to be fast-tracked into Acadia’s practicum course. The MOA also allows applicants missing a limited number of courses to obtain those through the same expedited pathway. This innovation is intended to assist both Canadian and international applicants.</p>
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<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides, if applicable, information to unsuccessful applicants that may assist them in obtaining registration at a later date; and</li> <li>• the respondent’s answer describes any other supports/referrals/information provided to unsuccessful applicants.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> provide, if applicable, information to unsuccessful applicants that may be assist them in obtaining registration at a later date; or</li> <li>• if the regulating body does provide any other supports/referrals/information to unsuccessful applicants (response = “yes”), the respondent’s does <i>not</i> describe this supports/referrals/information.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</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 14

Do you have a process for an applicant to request an internal review/appeal after a decision has been made on the registration/application? Include how this process is communicated to the applicant.

Alignment with FRPA: *Sections 7(a), 10(1)(2)(4) and 16(3)(m)*

### RESPONDENT ANSWER

Yes

No

**If yes, explain the internal review/appeal process and how it is communicated.**

**Policy R-05.0 [Notice of Registration Decision and Right to Appeal](#)** provides the steps a denied applicant is required to take in order to begin and appeal of the decision. The terms of reference of the Registration Appeals Committee, provides additional information on the membership of the committee, and the requirements set out in the *Counselling Therapists Act*. The terms of reference of the Registration Appeals Committee are available through several links on the website including here... **Policy R-05.0 [Notice of Registration Decision and Right to Appeal](#)** and the [Registration Appeal Committee](#) terms of reference are included in the notice of application denial.

The process outlined in **R-05.0 [Notice of Registration Decision and Right to Appeal](#)** is as follows:

- the appellant has 30 days following notification of a decision in which to begin an appeal
- the appeal will be heard within 60 days of the College receiving notice and details of the appeal
- the Chair of the Registration Appeals Committee will notify the appellant, the EDR, and the Chair of the Registration Committee of the date of the hearing
- the Chair of the Registration Appeals Committee will provide all parties with information on the process and procedures of the appeal, which must include copies of the *Counselling Therapists Act* 21(1) - 22(3), and *NSCCT General Bylaws* 23(1)(2).
- The Chair of the Registration Appeals Committee will ensure that no person who acted as a decision-maker in respect of the registration decision in questions also acts as a decision-maker in the internal review of that registration decision (FRPA 10(5))
- The Appellant has the right to present a response or make submissions to the Committee up to ten (10) days prior to a scheduled hearing. *CTA* 21(1)(c)(iii); 21(3); and 21(5)(a). Submissions can be made by registered mail, personal service or electronically.

	<p>“The Registration Appeals Committee is charged with the duty to make any determination that it deems ought to have been made by the Registration Committee (CTA 22(1)). Notice of decision (including reasons) shall be provided to the appellant in writing within fifteen (15) business days of hearing the appeal. The decision of the Registration Appeal Committee is final (CTA 23(3)).”</p> <p><b>If no, what do you do if an internal review/appeal is requested?</b></p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides an internal review process for applicants who are not granted registration, including opportunities for applicants to make submissions respecting such review; and</li> <li>• the respondent’s answer includes a description of the internal review process, including how it is communicated to applicants.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> provide an internal review process for applicants who are not granted registration, including opportunities for applicants to make submissions respecting such review; or</li> <li>• the respondent’s answer does <i>not</i> include a description of the internal review process, including how it is communicated to applicants.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>

### QUESTION 15

Do you have a timeframe for applicants to submit a request to initiate an internal review/appeal, after a decision has been issued?

Alignment with FRPA: *Sections 7(a) and 10(1)*

<b>RESPONDENT ANSWER</b>	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <b>If yes, what is the timeframe that an applicant has, to initiate the internal review/ appeal process (in days)?</b>  <p>In the case where the NSCCT Registrar/Registration Committee does not grant licensure to an applicant, the applicant may appeal the decision to the Registration Appeal Committee. <b>Policy R-05.00 <a href="#">Notice of Registration Decision and Right to Appeal</a></b> states that, “The College must receive written notice of an appeal within thirty (30) days of the applicant receiving notice of the decision.”</p> <p>Hearing of the appeal will occur within sixty (60) days of the College receiving the notice of appeal.</p> <p>Applicants who have been denied registration are made aware of these time-frames by the inclusion of <b>Policy R-05.00 <a href="#">Notice of Registration Decision and Right to Appeal</a></b> in their ‘Notice of Decision’.</p>
<b>COMPLIANCE CRITERIA</b>	<b>Compliant:</b> <ul style="list-style-type: none"> <li>• The regulating body has established a timeframe within which they must provide applicants with an internal review/appeal; and</li> <li>• the respondent’s answer includes a timeframe.</li> </ul> <b>Not compliant:</b> <ul style="list-style-type: none"> <li>• The regulating body has <i>not</i> established a timeframe within which they must provide applicants with an internal review/appeal; or</li> <li>• the respondent’s answer does <i>not</i> include a timeframe.</li> </ul>
<b>REVIEW FINDINGS</b>	<b>To be completed by the FRPA Review Office:</b>  <input checked="" type="checkbox"/> Compliant  <input type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>

## QUESTION 16

Do you have a process for which an applicant can request access to records from the registration/application?

Alignment with FRPA: *Sections 12(4),16(3)(j) and 16(3)(n)*

### RESPONDENT ANSWER

Yes

No

**If yes, please describe the process, and include the associated fees, for the individual to obtain the records from the applicant's file.** (Examples: application forms, reference letters, transcripts, criminal background checks, certificates of professional conduct, proof of good standing in another jurisdiction, etc.)

**Policy R-05.1** [Routine Access to Application Records](#) outlines the process and criteria for an applicant to access records without the need for a FOIPOP application.

#### **Process:**

Following receipt of a written request for access to documents, the EDR will review the file to determine if the documents requested are eligible for release to the requestor, and in what form (i.e., complete, severed or redacted). The presumption is in favour of granting the request barring any exceptions or limitations as outlined in **Policy R-05.1**.

Five "Exceptions and Limitations" to regulators granting access to application records are provided in the *Fair Registration Practices Act* 12(2) and are reprinted in **R-05.1**. Furthermore, records that contain the *personal information* of third parties, will not be disclosed without the need for a FOIPOP application, unless the personal information has been severed or redacted. Section 3(1)(l) of the *Freedom of Information and Protection of Privacy Act* defines nine (9) categories of recorded information about an identifiable individual that define "personal information." Each of these is reproduced in **R-05.1**.

**R-05.1 1** [Routine Access to Application Records](#) notifies requestors that "All costs associated with the retrieval, reproduction and forwarding of records will be the responsibility of the requesting person. Fees will be based on a reasonable estimation of cost-recovery."

The policy also informs applicants that all costs associated with the retrieval, reproduction and forwarding of records is the responsibility of the applicant; and that fees are based on a "reasonable estimation of cost-recovery."

<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body has a process under which requests for access to records are considered; and</li> <li>• the respondent's answer provides a description of the process.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> have a process under which requests for access to records are considered; or</li> <li>• the respondent's answer does <i>not</i> provide a description of the process.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>

### QUESTION 17

Are the individuals who acted as decision-makers in respect to the initial registration decision different than the decision-makers in the internal review/appeal?

Alignment with FRPA: Sections 10(5) and 16(3)(n)

<b>RESPONDENT ANSWER</b>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The respondent's answer states that no one who has acted as a decision maker for a registration decision has also acted as a decision maker in an internal review/appeal.</li> </ul> <p><b>Not compliant:</b></p>

	<ul style="list-style-type: none"> <li>The respondent’s answer does <i>not</i> state that no one who has acted as a decision maker for a registration decision has also acted as a decision maker in an internal review/appeal.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>

### QUESTION 18

Explain the process that is used to ensure that the initial decision-maker for the registration/application of an applicant is different than the decision-maker in the internal review/appeal process.

Alignment with FRPA: *Sections 10(5) and 16(3)(n)*

<b>RESPONDENT ANSWER</b>	<p><b>Explain the process:</b></p> <p><b>Policy R-05.0 0 <a href="#">Notice of Registration Decision and Right to Appeal</a></b> states: “The Chair of the Registration Appeal Committee will ensure that no person who acted as a decision-maker in respect of the registration decision in question also acts a decision-maker in the internal review of that registration decision.” Furthermore, the terms of reference for the Registration Appeal Committee, specifically states: “Not open to members of the Registration Committee;” and the terms of reference of the Registration Committee is “Not open to members of the Registration Appeal Committee.”</p> <p><b>Process</b></p> <p>In practice this is managed by the Board at the time members of the Registration Committee and of the Registration Appeal Committee are appointed; based on <b>Policy R-05.0 0 <a href="#">Notice of Registration Decision and Right to Appeal</a></b> and adherence to the relevant terms of reference. It is the responsibility of the Chair of the Registration Appeal Committee, with the assistance of the Registrar and Administrative Coordinator, to confirm that members hearing a particular appeal conform to the policy.</p>
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	Importantly, the applicant/appellant is provided with a copy of <b>R-05.0 0</b> <a href="#">Notice of Registration Decision and Right to Appeal</a> and the membership of both the <a href="#">Registration Committee</a> and <a href="#">Registration Appeal Committee</a> are easily verifiable by the applicant/appellant or their advocate
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>The respondent’s answer explains any process that is used to ensure that the initial decision maker for the registration/application of an applicant is different than the decision maker in the internal review/appeal process.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>The respondent’s answer does <i>not</i> explain the process (if they have one in place) that is used to ensure that the initial decision maker for the registration/application of an applicant is different than the decision maker in the internal review/appeal process.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b>

### QUESTION 19

How are the results of an internal review/appeal decision communicated/provided to the applicant? (Examples: in writing, email, etc.) Are the reasons included in the results? Do you have a timeframe to provide an internal review/appeal decision, and is the timeframe written and communicated to the applicant?

Alignment with FRPA: *Section 10(3)*

<b>RESPONDENT ANSWER</b>	<p><b>Explain how the results are provided and if the results include reasons (also include how the timeframe is written and communicated to the applicant):</b></p> <ul style="list-style-type: none"> <li><b>Policy R-05.0</b> <a href="#">Notice of Registration Decision and Right to Appeal</a>. “Notice of decision (including reasons shall be provided to the Applicant in writing within fifteen (15) business days of hearing the appeal. The decision of the <a href="#">Registration Appeal Committee</a> is final (CTA 23(3).”</li> </ul>
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	<p>The Registration Appeals Committee makes use of a version of the document “Tips for Writing Reasons” developed by the Nova Scotia Regulated Health Professions Network to help ensure decision letters meet best-practice standards.</p> <p>The policy also requires that the Chair of the Registration Appeal Committee provide the appellant with a copy of: <b>Policy R-05.1</b>; the <i>Counselling Therapists Act</i> 21(1)-22(3); and, NSCCT General Bylaws 23(1)(2).</p>
<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>The internal review decision maker provides applicants with a written decision that includes reasons and a timeframe.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>The internal review decision maker does <i>not</i> provide applicants with a written decision that includes reasons and a timeframe.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p>

<b>QUESTION 20</b>	
<p>Have the decision-makers for the internal review/appeal process received training on how to conduct an internal review/appeal?</p> <p>Alignment with FRPA: <i>Sections 11 and 16(3)(p)</i></p>	
<b>RESPONDENT ANSWER</b>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><b>If yes, explain what training is required for the decision makers for internal reviews/appeal:</b></p>



Currently, there is no formal training for members of the [Registration Appeal Committee](#). There is no history of NSCCT ever having a formal registration appeal. However, over the past month the College has been researching alternatives for providing training to the Committee. The College has also become involved with the NSRHPN in their process of revising policies and documents for a shared registration appeals process. The NSRHPN is regarded as our greatest single resource in the area.

The [Policy and Procedures Committee](#) has been leading the College's efforts and has assembled a first-draft outline to guide ongoing development of [Registration Appeal Committee](#) training. The Committee has begun to accumulate resources that will be adapted for use, and there is a reasonable expectation that a training session could be trialed in early summer.

### Content

All members of the Registration Appeals Committee

- must have a working knowledge of the rights of an appellant in respect to the fairness, transparency, timeliness and objectivity required of the appeals process.
- must be familiar with the roles and responsibilities of the [Registration Appeal Committee](#) Terms of Reference as mandated by the *Counselling Therapists Act* (Sections 20-22).
- will require orientation to the registration process and related policies and the provisions of **Policy R-05.0** [Notice of Registration Decision and Right to Appeal](#).
- will need to be acquainted with the process of conducting a formal hearing.
- will need to develop skills related to writing reasons in support of an appeals decision.
- will need to acquire cultural competencies.
- will require active listening skills.

### Delivery

- pedagogically sound
- easily reproducible
- inexpensive
- on-line self-study? Modular?

END-JH

<b>COMPLIANCE CRITERIA</b>	<p><b>Compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body provides training to individuals who make internal review decisions; and</li> <li>• the respondent's answer describes the training.</li> </ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"> <li>• The regulating body does <i>not</i> provide training to individuals who make internal review decisions; or</li> <li>• the respondent's answer does <i>not</i> describe the training.</li> </ul>
<b>REVIEW FINDINGS</b>	<p><b>To be completed by the FRPA Review Office:</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 Office:</b></p> <p>Though this is not a current registration practice, it is evident that work is in progress to address this gap.</p>

### III: OTHER NOTES

During the review process areas for improvement in registration practices may be noted that are outside what is required for compliance with the FRPA. Though not mandatory, these practices are noted in this section for consideration by the regulating body.

The following was noted during the review of registration practices for NSCCT:

- Over the past year transparency has been improved with numerous additions to the registration portion of the NSCCT website. Information for all streams of applications (Nova Scotia, CFTA and International) is available. However, it is necessary to scroll through all information to find the relevant pathway. NSCCT could improve transparency by having separate tabs for each application pathway, allowing applicants to identify with their relevant route without having to scroll through all the information.

For support with this and other actions associated with the improvement of registration practices, the regulating body may contact the Review Officer for advice, provision of templates, information, research and/or best practice. The FRPA Office can assist with templates and example policies on items that are required for compliance under the Act. (example: Web Design Best Practices). Sample policies and templates can be requested from the Review Officer at any time or by visiting the FRPA website: [Resources for Regulatory Bodies | FRPA \(novascotia.ca\)](#)

## IV: ACKNOWLEDGEMENTS:

The Nova Scotia College of Counselling Therapists 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.

DATE: May 31, 2021

SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

A handwritten signature in black ink, appearing to read "Eli F. Wald".

Chair, NSCCT Board of Directors

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 Counselling Therapists

INFORMATION ON REGISTRATION PRACTICES AS OF: 2021-02-23

**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>	2021-05-20	2022-06-01	Click or tap to enter a date.	Click or tap to enter a date.	Click or tap to enter a date.
<b>Actual Completed Date</b>	2021-05-19	Click or tap to enter a date.	Click or tap to enter a date.	Click or tap to enter a date.	Click or tap to enter a date.

**ACTION PLAN:**

ALIGNMENT WITH THE FRPA	OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES
<i>Sections 11, 16(3)(p)</i>	

	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
<b>Action required</b>	20	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- ensure that individuals acting as decision-makers in internal reviews receive training on conducting an internal review.</li> <li>- develop a plan and document training provided to individuals who make internal review decisions</li> </ul>	<p>As of this report, an on-boarding package has been developed for new members and incumbent members who have not had training or introduction to the Committee. It includes adaptations of documents produced by NSRHPN as well as excerpts from the <i>Counselling Therapists Act</i>.</p> <p>The College has engaged the law firm of Pink-Larkin (Governance Section) to provide 3 hours of web-based training consisting of the following components:</p> <ul style="list-style-type: none"> <li>• An orientation to professional regulation</li> <li>• Review of the Act &amp; Regulations regarding Registration Appeals</li> <li>• Review of the FRPA requirements</li> <li>• Fundamentals for ensuring a fair and transparent Appeals Process</li> <li>• “How to” conduct a Registration Appeal</li> <li>• Basics of decision making and decision writing</li> </ul>	<p>Completed</p> <p>September 2021</p>	<p>An excellent plan to address the current gap in registration practices.</p>
<b>Update 1</b>					
<b>Update 2</b>					
<b>Update 3</b>					
<b>Update 4</b>					