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Business Licensing Section: Service Nova  
Scotia and Internal Services – Hearing Aid  
Salesperson

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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 Business Licensing Section of Service Nova Scotia and Internal Services are responsible for the registration practices associated with the issuing of permits to Hearing Aid Salespersons. The Review Officer worked with the Business Licensing Section over a period of 8 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 not all registration practices are compliant with the FRPA at this time. As a result, this report includes both an overview of the current registration practices of the Business Licensing Section for Hearing Aid Salespersons and an action plan to address some high priority gaps moving forward.

This review has taken longer than usual to complete because of staffing changes in the Business Licensing Section and time required to raise awareness of regulator obligations under the FRPA. There was considerable confusion regarding regulated responsibility for occupational standards and the role of third-party assessors. Though progress was made in terms of acknowledging the regulator responsibility, further work is required to ensure that applicants are made aware of registration requirements and assessment criteria associated with the regulated apprenticeship pathway to licensure as distinction from a degree in audiology certified by another regulating body as a secondary pathway to licensure.

The Business Licensing Section used this review process as an opportunity for self-audit and to identify areas for improvement. The regulator has acknowledged the findings and has taken the first step to address areas of non-compliance by developing an Action Plan (see Appendix A). Twelve plans for action are identified to address practices that are currently not compliant with the FRPA. They are summed up as follows:

- Provide information in a clear and understandable form to individuals, including individuals qualified in another jurisdiction in Canada, as well as those who received their qualifications outside of Canada. This will include clear instructions on what documentation must accompany applications,
- Develop guidelines that describe alternatives that would be acceptable when documentation that must accompany an application cannot be obtained for reasons beyond the applicant's control,
- Develop a policy on how to work with applicants who may require accommodations during the registration process,
- Document all criteria that are used to assess whether requirements for certification have been met,

- Document a process to ensure that applicants who are not granted registration are provided with a written decision that includes the reasons why registration has been denied,
- Provide information with respect to measures or programs that may be available to assist unsuccessful applicants in obtaining certification in the future,
- Develop and document a clearly defined process under which requests for access to records will be considered,
- Establish a process for internal review of the registration decision that is compliant with the FRPA, include timeframes and the provision to provide written decisions with reasons,
- Develop a process to ensure that no one who acted as a decision-maker in a registration decision may act as a decision-maker in an internal review of the same decision, and
- Develop a plan and document training provided to individuals who make internal review decisions.

The Review Officer has provided comments in response to the Action Plan which will be important for the regulator to take into consideration when addressing the actions. The Business Licensing Section has committed to updating the Hearing Aid Salesperson Permit website by July 2021 with interim messaging such as contact information for CFTA applicants where new processes are still under development. Actions associated with policy development are expected to be complete by February 2022 while timelines associated with other actions requiring further research and consultation to determine the best way forward are still to be decided.

Despite the many challenges the Business Licensing Section has demonstrated engagement in the FRPA review process and has given every indication that planned actions to rectify areas of non-compliance will be addressed. 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 47 [regulatory bodies](#) in Nova Scotia, covering over 59 occupations and 21 designated trades. A regulatory body (regulatory authority or regulator) sets the standards and regulates how people practice as members of an occupation. Everyone who practices within a regulated occupation must register with the regulatory body.

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

## 1.2.OVERVIEW OF THE REGULATING BODY

Business Licensing and Compliance, a division of Business and Consumer Services, Service Nova Scotia and Internal Services is responsible for licensing and compliance under the Direct Sellers’ Regulation Act and Direct Sellers Regulations. Hearing Aid Dealer Permits and Hearing Aid Salesperson Permits fall under this Act

Service Nova Scotia and Internal Services is the regulating body responsible for the issuance of the hearing aid salesperson permit which has an educational requirement. The hearing aid salesperson permit does not speak to how you assess, diagnose or care for a patient in any way; it simply allows a qualified individual to sell hearing aids. To determine if an applicant is qualified, we rely on one of the following educational criteria:

1. Master’s degree in Audiology and registration through the Nova Scotia College of Audiologists and Speech-Language Pathologists (NSCASLP)

2. Hearing aid apprenticeship – Confirmation from a licensed hearing aid dealer of a 6-month apprenticeship, certification through the International Hearing Society (IHS) and a practical exam through Nova Scotia Hearing and Speech Centres (NSHSC).

If an applicant is outside of Nova Scotia or Canada and has different credentials, Service Nova Scotia and Internal Services relies on 3rd party subject matter experts at the Nova Scotia College of Audiologists and Speech-Language Pathologists (NSCASLP) and Nova Scotia Hearing and Speech Centres (NSHSC) to determine if the educational criteria has been met.

Service Nova Scotia and Internal Services is only responsible for the regulation of sales of hearing aids through direct sale or through a retail store. Service Nova Scotia and Internal Services does not regulate the profession of Audiologists or Hearing Healthcare Practitioners

More information can be found on the websites below:

Hearing Aid Salesperson Permit

<https://beta.novascotia.ca/hearing-aid-salesperson-permit>

Hearing Aid Dealer Permit

<https://beta.novascotia.ca/hearing-aid-dealer-permit>

## 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 Business Licensing Section 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
<p>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.</p> <p>Alignment with FRPA: <i>Section 7(a), Section 9(a), 16(3)(a) and 16(3)(b)</i></p>

<p><b>RESPONDENT ANSWER</b></p>	<p><b>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).</b></p> <p>The requirements for the Hearing aid Salesperson Permit are as follows:</p> <ul style="list-style-type: none"> <li>• You need to be 19 or older to apply</li> <li>• Your employer needs to have the Hearing Aid Dealer Permit</li> <li>• You need to complete the hearing aid salesperson application form and submit this form to our office with the required fee. <ul style="list-style-type: none"> <li>○ This can be submitted through fax or mail</li> </ul> </li> <li>• You need to meet 1 of the following educational standards: <ul style="list-style-type: none"> <li>○ Master’s degree in audiology and be registered with the Nova Scotia College of Audiologists and Speech-Language Pathologists</li> <li>○ Or</li> <li>○ Complete a 6-month apprenticeship with a licensed hearing aid dealer, complete the International Licensing Exam and complete a practical exam <ul style="list-style-type: none"> <li>▪ In your application form you would include a letter from a licensed hearing aid dealer stating that you have completed a 6-month apprenticeship</li> <li>▪ Our office would review your application form and apprentice letter and then ask permission for our office to contact the International Hearing Society (3<sup>rd</sup> Party) to arrange the completion of the International Licensing Exam</li> <li>▪ We receive notification from the International Hearing Society that the applicant successfully completed their International Licensing Exam. We notify the applicant that they were successful and ask permission for our office to contact the Nova Scotia Hearing and Speech Centres (3<sup>rd</sup> Party) to arrange completion of the practical exam</li> <li>▪ Once our office has been notified of successful completion of the practical exam then the hearing aid salesperson permit will be approved and issued</li> </ul> </li> </ul> </li> </ul> <p>Please see below the following links pertaining to requirements, documents to be submitted and the registration process:</p> <p>Link to hearing aid salesperson permit information: <a href="https://beta.novascotia.ca/hearing-aid-salesperson-permit">https://beta.novascotia.ca/hearing-aid-salesperson-permit</a></p> <p>Link to application form for hearing aid salesperson permit: <a href="https://beta.novascotia.ca/sites/default/files/documents/3-387/hearing-aid-salesperson-application-form-en.pdf">https://beta.novascotia.ca/sites/default/files/documents/3-387/hearing-aid-salesperson-application-form-en.pdf</a></p> <p>Link to Direct Sellers’ Regulation Act: <a href="https://nslegislature.ca/sites/default/files/legc/statutes/direct%20sellers'%20regulation.pdf">https://nslegislature.ca/sites/default/files/legc/statutes/direct%20sellers'%20regulation.pdf</a></p> <p>Link to Direct Sellers Regulations: <a href="https://www.novascotia.ca/just/regulations/regs/dsregs.html">https://www.novascotia.ca/just/regulations/regs/dsregs.html</a></p>
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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>Hearing Aid Salesperson Permit</li> </ul>	<ul style="list-style-type: none"> <li>Application form</li> <li>Registration with Nova Scotia College of Audiologists and Speech Language Pathologists. We confirm this on their registry on their website</li> </ul>	<ul style="list-style-type: none"> <li>Application Form: <a href="https://beta.novascotia.ca/sites/default/files/documents/3-387/hearing-aid-salesperson-application-form-en.pdf">https://beta.novascotia.ca/sites/default/files/documents/3-387/hearing-aid-salesperson-application-form-en.pdf</a></li> <li>Nova Scotia College of Audiologists and Speech Language Pathologists website for Registration Details: <a href="https://nscaslp.ca/client/roster/clientRosterView.html?clientR">https://nscaslp.ca/client/roster/clientRosterView.html?clientR</a></li> <li>See attached Process Document (cannot attach in this section)</li> </ul>
	<ul style="list-style-type: none"> <li>Hearing Aid Salesperson Permit</li> </ul>	<ul style="list-style-type: none"> <li>Application form</li> <li>6 Month Apprenticeship Letter from Licensed Hearing Aid Dealer. The letter is written by a representative from the Hearing Aid Company and it states the name of the Hearing Aid Company, the name of the applicant, and confirmation that at least 6 months in an apprenticeship role has been completed by the applicant</li> <li>Completion of International Licensing Exam. For this requirement, our office would receive an email from International Hearing Society stating that they are recommending a passing grade for the applicant</li> </ul>	<ul style="list-style-type: none"> <li>Application Form: <a href="https://beta.novascotia.ca/sites/default/files/documents/3-387/hearing-aid-salesperson-application-form-en.pdf">https://beta.novascotia.ca/sites/default/files/documents/3-387/hearing-aid-salesperson-application-form-en.pdf</a></li> <li>See attached Process Document (cannot attach in this section)</li> </ul>

		• Completion of Practical Exam. For this requirement, our office would receive an email from the Nova Scotia Hearing and Speech Centres that the applicant has passed this exam.	
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COMPLIANCE CRITERIA	<b>Compliant:</b> <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> <b>Not compliant:</b> <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></ul>		

	• the respondent’s answer does <i>not</i> describe the registration process and the process for meeting them.
REVIEW FINDINGS	<b>To be completed by the FRPA Review Office:</b>  <input checked="" type="checkbox"/> Compliant  <input type="checkbox"/> Not compliant
COMMENTS: REVIEW FINDINGS	<b>Comments, to be completed by the FRPA Review Office:</b>

QUESTION 2	
How is the registration/application process communicated to the applicant?	
Alignment with FRPA: <i>Sections 7(c), 9(a) and 16(3)(g)</i>	
RESPONDENT ANSWER	<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 checked="" type="checkbox"/> Other: <b>explain your communication process if not listed above</b> We also provide this information to the applicant over the phone and provide link to website where details pertaining to registration can be found: <a href="https://beta.novascotia.ca/hearing-aid-salesperson-permit">https://beta.novascotia.ca/hearing-aid-salesperson-permit</a></p>

COMPLIANCE CRITERIA	<p><b>Compliant:</b></p> <ul style="list-style-type: none"><li>• The regulating body makes requirements for registration available to applicants (they select at least 1 response option); and</li><li>• the respondent’s answer describes how the requirements for registration are made available to applicants.</li></ul> <p><b>Not compliant:</b></p> <ul style="list-style-type: none"><li>• The regulating body does <i>not</i> make requirements for registration available to applicants (they do not select any response options); or</li><li>• the respondent’s answer does <i>not</i> describe how the requirements for registration are made available to applicants.</li></ul>
REVIEW FINDINGS	<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>
COMMENTS: REVIEW FINDINGS	<p><b>Comments, to be completed by the FRPA Review Office:</b></p>

QUESTION 3
<p>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)</p> <p>Alignment with FRPA: <i>Sections 3, 6, 7(a through f) and 16(3)(a)</i></p>

RESPONDENT ANSWER	Please provide information in the chart below, with a separate answer per licence/certification type:				
	LICENSE TYPE	YES/NO	IF YES, EXPLAIN THE DIFFERENCE	PROCESS DOCUMENTED  YES/NO	LINK TO PUBLISHED DOCUMENT, IF APPLICABLE
	• Hearing Aid Salesperson Permit	• Yes	<ul style="list-style-type: none"><li>• We reach out to the appropriate subject matter expert and other governing bodies to provide direction. The process and direction are explained to the client. Each situation is different and specific requirements may vary and would be explained to the client in detail. By reaching out to subject matter experts we are seeking their advice so that we do not deny the applicant without investigating all options beforehand</li><li>• The subject matter expert for master of audiology requirements is Nova Scotia College of Audiologists and Speech-Language Pathologists, Registrar, Cindy Wheeler M.Sc., SLP-Reg. Link to site: <a href="https://nscaslp.ca/">https://nscaslp.ca/</a></li><li>• The subject matter expert for transferring of jurisdictions is Nova Scotia Hearing and Speech Clinic, Dr. Greg Noel Director-Audiology, Hearing and Speech Nova Scotia. Link to site: <a href="http://www.nshsc.nshealth.ca/">http://www.nshsc.nshealth.ca/</a></li><li>•</li></ul>	• Yes	• See attached process document (cannot attach)
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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 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>Although third parties are relied upon for the assessment of equivalency, the registration process and final decision still rest with SNSIS. How would an applicant who has received their qualifications outside Canada know that they are eligible to apply/that there is an application process for them? What documentation requirements would they have to fulfill? Are there any other requirements such as translation? To be compliant with the FRPA regulating bodies are required to provide information in a clear and understandable form to individuals who received their qualifications outside of Canada.</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 licence/certification type:		
	LICENSE TYPE	YES/NO	IF YES, EXPLAIN THE DIFFERENCE
	• Hearing aid salesperson permit	• No	•
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	COMPLIANCE CRITERIA	<b>Compliant:</b> <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>	

	<b>Not compliant:</b> <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>	<b>To be completed by the FRPA Review Office:</b>  <input type="checkbox"/> Compliant  <input checked="" type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>  A jurisdictional scan shows that the practice of Hearing Aid/Instrument Practitioners/Salespersons is a regulated occupation in other jurisdictions. Therefore, a streamlined application process that aligns with the CFTA should be available for applicants who are already registered outside of Nova Scotia. The answer indicates there is no streamlined application process for CFTA applicants. To be complaint with the FRPA regulating bodies must provide information in a clear and understandable form to individuals who have received their qualifications in another jurisdiction in Canada, including those who are already registered in another jurisdiction (CFTA transfers).

<b>QUESTION 5</b>	
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: <i>Sections 7(f) and 16(3)(d)</i>	
<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>  The fee is listed on our website however if an individual calls us or emails us we provide this information through phone and email as well.  <b>Insert a website link of where this information is communicated, if applicable.</b>



	<p>Hearing Aid Salesperson Permit Webpage for fees associated with Service Nova Scotia and Internal Services: <a href="https://beta.novascotia.ca/hearing-aid-salesperson-permit">https://beta.novascotia.ca/hearing-aid-salesperson-permit</a></p> <p>Third-Party Information pertaining to fees:</p> <p>International Hearing Society for Information on fees for International Licensing Exam: <a href="http://ihsinfo.org/IhsV2/About_Us/contactus.cfm">http://ihsinfo.org/IhsV2/About_Us/contactus.cfm</a></p> <p>Nova Scotia College of Audiologists and Speech-Language Pathologists contact information for fees: <a href="https://nscaslp.ca/site/contact">https://nscaslp.ca/site/contact</a></p> <p>Nova Scotia Hearing and Speech Centres, contact information for fees: <a href="http://www.nshsc.nshealth.ca/?q=contact-us">http://www.nshsc.nshealth.ca/?q=contact-us</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>Service Nova Scotia and Internal Services fees: Full year is \$52.95 however we do prorate the fee</p>
COMPLIANCE CRITERIA	<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>
REVIEW FINDINGS	<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>
COMMENTS: REVIEW FINDINGS	<p><b>Comments, to be completed by the FRPA Review Office:</b></p>

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)*

RESPONDENT  
ANSWER

- ☒ Yes
- ☐ No

If yes, please explain the process:

- We reach out to the appropriate third-party subject matter expert and other governing bodies to provide direction. The process and direction are explained to the client. Each situation is different and specific requirements may vary and would be explained to the client in detail. By reaching out to subject matter experts we are seeking their advice so that we do not deny the applicant without investigating all options beforehand
- The subject matter expert for master of audiology requirements is Nova Scotia College of Audiologists and Speech-Language Pathologists , Registrar, Cindy Wheeler M.Sc., SLP-Reg. Link to site: <https://nscaslp.ca/>
- The subject matter expert for transferring of jurisdictions is Nova Scotia Hearing and Speech Clinic, Dr. Greg Noel Director-Audiology, Hearing and Speech Nova Scotia. Link to site: <http://www.nshsc.nshealth.ca/>
- Ultimately, we do not decide if the education credential documents the applicant provides are acceptable. That decision is made by the third-party subject matter experts at the Nova Scotia College of Audiologists and Speech-Language Pathologists (NSCASLP) and Nova Scotia Hearing and Speech Centres (NSHSC).

COMPLIANCE  
CRITERIA

**Compliant:**

- 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
- the respondent’s answer describes any such alternative information.

**Not compliant:**

- The regulating body does *not* advise applicants on alternative information that applicants may provide when they cannot obtain documentation of their qualifications for reasons beyond their control; or

	<ul style="list-style-type: none"><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 type="checkbox"/> Compliant  <input checked="" type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>  The decision to issue the salesperson permit is the responsibility of SNSIS. As such SNSIS is responsible to ensure that all applicants have access to fair registration practices. There is no description of acceptable alternative information to ensure that every application is managed in an impartial way. To be compliant with the FRPA regulating bodies have guidelines that describe expectations regarding documentation and alternatives that would be acceptable when documentation cannot be obtained (education documents, etc.)

<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 checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> When required  <b>If yes or when required, what types of support are provided to applicants during the registration/application process?</b>  All the information is listed on the website however we provide our phone number and email address so if anyone has any questions, they can reach out to us as many times as necessary throughout the process. The applicant can also seek coaching support from their employer on the process. We also direct applicants to the Nova Scotia College of Audiologists and Speech-Language Pathologists when appropriate. If an applicant is not registered with the college but has told us they have a Master’s in Audiology or another degree (that they told us was the equivalent to a masters) we do not decide if the education credential documents

	<p>the applicant provides are acceptable; our requirement is simply that they are registered with the college. That decision is made by the Nova Scotia College of Audiologists and Speech-Language Pathologists (NSCASLP) as to whether someone is eligible to register with the college.</p> <p>Cindy Wheeler, M.Sc., SLP-Reg Registrar NSCASLP <a href="mailto:registrar@nscaslp.ca">registrar@nscaslp.ca</a></p> <p>If someone contacts us for information on the apprenticeship route, we will provide the requirements. They need a 6-month apprenticeship with a licensed hearing aid dealer and completion of the International Licensing Exam (ILE) and successful completion of the practical exam. We will answer questions regarding application and requirements for licensing.</p> <p>Once they apply (they have completed their 6-month apprenticeship) and we have asked the applicant for their permission to reach out to the International Hearing Society (IHS) we will contact IHS and provide the applicant's contact information and they arrange for the ILE exam with the applicant. The IHS will answer any questions the applicant may have about the exam, expectations, and processes. The IHS sends the exam results to us and we communicate them to the applicant. If they have any questions, we would liaison with the IHS to get a response.</p> <p>Once they have successfully completed the IHS exam and we have asked permission from the applicant, we send an email to Nova Scotia Hearing and Speech Centres (NSHSC) and they contact the applicant to arrange for the practical exam. Again, the NSHSC would answer any questions the applicant has regarding the practical exam, expectations, and processes. The NSHSC sends the exam results to us and we communicate them to the applicant. If they have any questions, we would liaison with the NSHSC to get a response</p>
COMPLIANCE CRITERIA	<p><b>Compliant:</b></p> <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> <p><b>Not compliant:</b></p> <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>
REVIEW FINDINGS	<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>

COMMENTS: REVIEW FINDINGS	Comments, to be completed by the FRPA Review Office:
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QUESTION 8	
<p>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.</p> <p>Alignment with FRPA: <i>Section 16(3)(h)</i></p> <p><b>Note:</b> 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:</p> <p><a href="https://nslegislature.ca/legc/bills/62nd_3rd/3rd_read/b059.htm">https://nslegislature.ca/legc/bills/62nd_3rd/3rd_read/b059.htm</a></p> <p><a href="https://nslegislature.ca/sites/default/files/legc/statutes/human%20rights.pdf">https://nslegislature.ca/sites/default/files/legc/statutes/human%20rights.pdf</a></p> <p>Examples of accommodations for this purpose can include, but is not limited to:</p> <ul style="list-style-type: none"><li>• Assistance in completing application forms</li><li>• Provision of additional time provided to complete exams</li><li>• Provision of an application in braille</li><li>• Provision of audio-visual equipment</li><li>• In person meetings/interviews/hearings</li><li>• Other accommodations such as paper color, larger font, etc.</li></ul>	
RESPONDENT ANSWER	<div><input type="checkbox"/> Yes</div> <div><input checked="" type="checkbox"/> No</div>

	<p><input type="checkbox"/> N/A</p> <p><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> <p><b>If no, what would the process be if an accommodation were to be required?</b></p> <p>We would assess the application on a case by case basis and provide support when necessary</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> <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>There is no description of exiting accommodation practices. Ensuring impartial registration practices for all applicants and compliance with the FRPA requires that the regulating body document a description of the accommodation practices (how to request and guidelines pertaining to types of accommodations) they make available to applicants.</p>

<b>QUESTION 9</b>	
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: <i>This is to provide additional information and identify if there are areas that the FRPA Review Officer may be able to assist, if applicable</i>	

RESPONDENT ANSWER	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <div>If yes, explain how and what steps would be taken to adapt this policy.<div>We would try our best to accommodate if an alternate language were requested</div></div> <div>If no, what would occur with that applicant if the policy/process could not be adapted?</div>
COMPLIANCE CRITERIA	<div>Compliant:<div>• NA</div></div> <div>Not compliant:<div>• NA</div></div>
REVIEW FINDINGS	<div>To be completed by the FRPA Review Office:</div> <div><input type="checkbox"/> NA</div> <div><input type="checkbox"/> NA</div>
COMMENTS: REVIEW FINDINGS	<div>Comments, to be completed by the FRPA Review Office:</div> <div>The written description, when developed, should be adaptable if a new situation arises.</div>

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)?**

On our application form, we collect information regarding their work experience, if they have been licensed before, if they have had any license revoked, as well if they are or have been involved with a bankruptcy. We review the information collected but would only follow up if someone has had a hearing type license suspended or revoked and the reason provided is not adequate or indicates a risk to consumers. This type of situation would be discussed with the Registrar. The applicant is not required to submit a criminal record check with their application form

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

Nova Scotia College of Audiologists and Speech-Language Pathologists has a public website which lists the registration numbers of individuals registered with the College: <https://nscaslp.ca/client/roster/clientRosterView.html?clientRosterId=288>

International Hearing Society provides our office with the results of the International Hearing Exam

Nova Scotia Hearing and Speech Centres provides our office with the results of the individual’s practical exam

COMPLIANCE  
CRITERIA

- Compliant:**
- The respondent’s answer describes how/where the criteria for meeting the requirements of registration/application are documented; and
  - the respondent’s answer describes the role of any third-party assessors.
- Not compliant:**
- The respondent’s answer *does not* describe how/where the criteria for meeting the requirements of registration/application are documented; or
  - if a third party is used for assessment, the respondent’s answer does *not* describe the role of the third-party assessors.



<b>REVIEW FINDINGS</b>	<b>To be completed by the FRPA Review Office:</b>  <input type="checkbox"/> Compliant  <input checked="" type="checkbox"/> Not compliant
<b>COMMENTS: REVIEW FINDINGS</b>	<b>Comments, to be completed by the FRPA Review Office:</b>  Although much of the assessment portion of the registration process is conducted by third parties, SNSIS is still responsible for setting the standard and issuing the permit, based on their determination (assessment) that criteria have been met. These criteria include the ILE and practical exam pass marks which are not described. The Apprenticeship route requires 6 months of employment with a hearing aid dealer. If not listed as a requirement, further work history should not be assessed. Good standing can be used as criteria to determine eligibility for licensure based on a certificate to certificate recognition from another jurisdiction. However, response to question 4 indicates there is currently no CFTA process in place. Assessment of criteria to determine eligibility for licensure must be directly linked to the requirements for registration. To be compliant with the FRPA regulating bodies must have in place transparent and objective assessment criteria to determine eligibility for registration including benchmarks for all requirements of registration.

<b>QUESTION 11</b>	
How are the criteria that you use to assess the requirements for registration/application made available to applicants?  Alignment with FRPA: <i>Section 7(a) and (d)</i>	
<b>RESPONDENT ANSWER</b>	<b>Select all that apply</b>  <input type="checkbox"/> Paper (hard copy) in the form of a fact sheet/pamphlet or handbook  <input type="checkbox"/> Available online to download (in the form of a fact sheet/pamphlet or handbook in PDF or another format)  <input checked="" type="checkbox"/> Email  <input checked="" type="checkbox"/> Website

	<input checked="" type="checkbox"/> Other, <b>explain your communication process if not listed above:</b> We also contact applicants by phone to explain the registration requirements and provide link to website where details pertaining to registration can be found: <a href="https://beta.novascotia.ca/hearing-aid-salesperson-permit">https://beta.novascotia.ca/hearing-aid-salesperson-permit</a>
<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 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>Requirements are listed on the website, but not the criteria that will be used to determine eligibility. Pass marks and links to third party information should be provided. If work history is going to be assessed, expectations around this should be clearly laid out. To be transparent and compliant with the FRPA the regulating body must provide applicants with a description of the criteria that will be used to determine if they are eligible for registration.</p>

<b>QUESTION 12</b>
<p>Do you have a process for providing the reason(s) why a registration/application is not approved?</p> <p>Alignment with FRPA: <i>Sections 8(c) and 10(3)</i></p>

RESPONDENT ANSWER	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <div>If Yes, explain the process (Example: written decision, provision of information about the appeal process, etc.):  Written decision through letter or email that includes a reason as to why the applicant is not granted registration</div> <div>If No, explain why not (Example: registration/applications are always approved, only provided when requested, etc.):</div>
COMPLIANCE CRITERIA	<div>Compliant:<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></div> <div>Not compliant:<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></div>
REVIEW FINDINGS	<div>To be completed by the FRPA Review Office:</div> <div><input type="checkbox"/> Compliant</div> <div><input checked="" type="checkbox"/> Not compliant</div>
COMMENTS: REVIEW FINDINGS	<div>Comments, to be completed by the FRPA Review Office:</div> <div>Written decision provided, but no reasons provided for when an applicant is not granted registration.</div> <div>FRPA 8(c) <i>where registration is not granted, provide written decisions that include reasons to applicants within a reasonable time respecting registration decisions.</i></div>

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)*

**RESPONDENT  
ANSWER**

- ☒ Yes
- ☐ No

**If yes, what types of supports/referrals/information do you provide to unsuccessful applicants after a decision has been communicated?**

If an applicant is unsuccessful with an exam administered through the International Hearing Society or the Nova Scotia Hearing and Speech Centres, the applicant can attempt the exam again after 30 days. To reiterate again, we pass on the decisions from our third-party evaluators to the clients. Service Nova Scotia and Internal Services is only responsible for the regulation of sales of hearing aids through direct sale or through a retail store. Service Nova Scotia and Internal Services does not regulate the profession of Audiologists or Hearing Healthcare Practitioners.

**COMPLIANCE  
CRITERIA**

- Compliant:**
- The regulating body provides, if applicable, information to unsuccessful applicants that may assist them in obtaining registration at a later date; and
  - the respondent’s answer describes any other supports/referrals/information provided to unsuccessful applicants.
- Not compliant:**
- The regulating body does *not* provide, if applicable, information to unsuccessful applicants that may be assist them in obtaining registration at a later date; or
  - if the regulating body does provide any other supports/referrals/information to unsuccessful applicants (response = “yes”), the respondent’s does *not* describe this supports/referrals/information.

**REVIEW  
FINDINGS**

- To be completed by the FRPA Review Office:**
- ☐ Compliant
- ☒ Not compliant

**COMMENTS:  
REVIEW  
FINDINGS**

**Comments, to be completed by the FRPA Review Office:**

Response indicates opportunity to repeat an exam but does not describe supports that would facilitate future success.

*FRPA 8(d) provide, where practical, information respecting measures or programs that may be available to assist unsuccessful applicants in obtaining registration at a later date.*

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: <i>Sections 7(a), 10(1)(2)(4) and 16(3)(m)</i>	
RESPONDENT ANSWER	<div><div><input checked="" type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div></div> <div><p>If yes, explain the internal review/appeal process and how it is communicated.</p><p>The Direct Sellers’ Regulation Act has a process for appeals listed in Section 39. This appeal process is applicable to direct selling activities and is not specific to hearing aid sellers.</p><p>Direct Sellers’ Regulation Act</p><p><a href="https://nslegislature.ca/sites/default/files/legc/statutes/direct%20sellers'%20regulation.pdf">https://nslegislature.ca/sites/default/files/legc/statutes/direct%20sellers'%20regulation.pdf</a></p><p>If no, what do you do if an internal review/appeal is requested?</p></div>
COMPLIANCE CRITERIA	<div><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></div>

	<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 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>As per section 39 of the Direct Sellers Regulations Act: A person who is dissatisfied with a decision of the Registrar under this Act may, within thirty days from the date of the decision, appeal to a judge of the Supreme Court of Nova Scotia...</p> <p>This process does not constitute a review of the registration decision that is internal to the regulating body. 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.</p> <p>FRPA 10(2) <i>A regulating body shall provide an applicant for registration an opportunity to provide new information and to make submissions with respect to an internal review in such manner as determined by the internal review decision-maker.</i></p> <p>Legislative change may be required in order to comply with the FRPA.</p>

<b>QUESTION 15</b>
<p>Do you have a timeframe for applicants to submit a request to initiate an internal review/appeal, after a decision has been issued?</p> <p>Alignment with FRPA: <i>Sections 7(a) and 10(1)</i></p>

RESPONDENT ANSWER	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><b>If yes, what is the timeframe that an applicant has, to initiate the internal review/ appeal process (in days)?</b></p> <p>30 days after the decision has been made</p>
COMPLIANCE CRITERIA	<p><b>Compliant:</b></p> <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> <p><b>Not compliant:</b></p> <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>
REVIEW FINDINGS	<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>
COMMENTS: REVIEW FINDINGS	<p><b>Comments, to be completed by the FRPA Review Office:</b></p> <p>This response aligns with appeal to the Supreme Court of Nova Scotia which, as previously stated, does not constitute an internal review. In the absence of an internal review process, this practice is not compliant.</p> <p>FRPA 10(1) <i>Where a regulating body does not grant registration to an applicant, the regulating body shall provide an internal review process within a reasonable time and shall inform the applicant of the procedures and time frames for the internal review.</i></p>

QUESTION 16	
Do you have a process for which an applicant can request access to records from the registration/application?	
Alignment with FRPA: <i>Sections 12(4),16(3)(j) and 16(3)(n)</i>	
RESPONDENT ANSWER	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <p><b>If yes, please describe the process, and include the associated fees, for the individual to obtain the records from the applicant’s file.</b> (Examples: application forms, reference letters, transcripts, criminal background checks, certificates of professional conduct, proof of good standing in another jurisdiction, etc.)</p> <p>If a request is made in writing, we can provide the applicant with a copy of their application form and supporting documentation</p>
COMPLIANCE CRITERIA	<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>
REVIEW FINDINGS	<p><b>To be completed by the FRPA Review Office:</b></p> <div><input type="checkbox"/> Compliant</div> <div><input checked="" type="checkbox"/> Not compliant</div>
COMMENTS: REVIEW FINDINGS	<p><b>Comments, to be completed by the FRPA Review Office:</b></p> <p>The respondent’s answer does not provide a description of the process. A documented process should be in place with details as per section 12 of the FRPA. 12(4) <i>A regulating body shall establish a process under which requests for access to records will be considered.</i></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)

#### RESPONDENT ANSWER

☒ Yes

☐ No

#### COMPLIANCE CRITERIA

**Compliant:**

- 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.

**Not compliant:**

- The respondent's answer does *not* 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.

#### REVIEW FINDINGS

**To be completed by the FRPA Review Office:**

☐ Compliant

☒ Not compliant

#### COMMENTS: REVIEW FINDINGS

**Comments, to be completed by the FRPA Review Office:**

In the absence of an internal review process, there is no clarity regarding the decision-makers.

FRPA 16(3)(n) *a statement that no one who acted as a decision-maker in respect of a registration decision acted as a decision-maker in an internal review.*

### 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: <i>Sections 10(5) and 16(3)(n)</i>	
<b>RESPONDENT ANSWER</b>	<p><b>Explain the process:</b></p> <p>All applications are reviewed by the licensing officer first in our office. If a review/appeal was requested we would ensure that the decision-maker in the internal review/appeal process would be the Senior Licensing Officer, then the Deputy Registrar and then the Registrar. Further to that the applicant may implement the appeal process listed above.</p>
<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 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>This response implies that it may be possible to assign independent decision-makers. In the absence of an internal review process this process cannot be applied. Recommend that the Business Licensing Section consult with legal counsel to determine if an internal review process can be implemented without making changes to the Act.</p> <p>FRPA 10(5) <i>No one who acted as a decision-maker in respect of a registration decision may act as a decision-maker in an internal review in respect of that registration decision</i></p>

## 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: <i>Section 10(3)</i>	
RESPONDENT ANSWER	<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> <p>Results would be communicated through letter or email with the reasoning being the decision within 10 days.</p>
COMPLIANCE CRITERIA	<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>
REVIEW FINDINGS	<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>
COMMENTS: REVIEW FINDINGS	<p><b>Comments, to be completed by the FRPA Review Office:</b></p> <p>In the absence of an internal review process, what is being communicated? Where is this timeframe documented?</p> <p>FRPA 10(3) <i>An internal review decision-maker shall provide an applicant with a written decision that includes reasons within a reasonable time.</i></p>

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

	They have attended administrative justice sessions through the Department of Justice.
<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>Based on previous answers, there is currently no internal review process or internal review decision makers.</p> <p>FRPA 16 (3)(p) <i>a description of the training provided to individuals who make internal review decisions.</i></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 Hearing Aid Salespersons:

- Regulatory bodies are the experts for their profession and therefore set the standards for their occupation(s). As such, the FRPA review process does not examine the fairness of standards to meet requirements for the profession. It was however noted in the review that one of the pathways to obtain a Hearing Aid Salesperson permit requires that you also be a member of another regulating body. Applicants who select the degree pathway must meet requirements and are responsible for costs associated with maintaining membership in two regulating bodies in order to practice as a Hearing Aid Salesperson. This raises questions regarding substantive fairness and is a practice that the Business Licensing Section may wish to consider further. Could this secondary pathway be maintained without requiring membership in two regulating bodies?

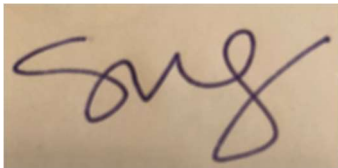
For support with this and other actions associated with the improvement of registration practices, the regulating body may contact the Review Officer for advice, provision of templates, information, research and/or best practice. The FRPA Office can assist with templates and example policies on items that are required for compliance under the Act. (example: Checklist for Certifying Labour Mobility Applicants). 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 Business Licensing Section of Service Nova Scotia and Internal Services 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:

SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

A handwritten signature in blue ink, appearing to be 'Sung', on a light-colored background.

## APPENDIX A: ACTION PLAN

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

NAME OF REGULATING BODY: Business Licensing Section, Service Nova Scotia & Internal Services: Hearing Aid Salesperson

INFORMATION ON REGISTRATION PRACTICES AS OF: 2020-10-20

### 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>	2021-04-12	2022-06-08	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>	2021-05-20	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 6, 7(a), (c), 9(a), 16(a), (b) and (g)</i>					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
<b>Action required</b>	3	Areas of non-compliance to be addressed in an action plan are as follows: - ensure that information regarding registration	Standards for international applicants are the same as all applicants.  The Hearing Aid Salesperson Permit webpage states all applicants must be 19 years of age or older and must be	July 1, 2021 (website) TBD (application)	These are two very different pathways to licensure. The standard route (as established in regulation

		<p>requirements and how requirements are to be met by <b>international applicants</b> is clear and easily accessible in the public domain through print and electronic media.</p> <ul style="list-style-type: none"> <li>- provide clear instructions on what documentation must accompany applications</li> </ul>	<p>employed by a licensed Hearing Aid Dealer. In addition, they must meet <u>one of the following equivalent training requirements</u>:</p> <ul style="list-style-type: none"> <li>• a master’s degree in audiology <u>and</u> registration with the Nova Scotia College of Audiologists and Speech-Language Pathologists,</li> <li>or</li> <li>• a 6-month apprenticeship with a licensed hearing aid dealer <u>and</u> completion of the International Licensing Exam (ILE) <u>and</u> successful completion of the practical exam</li> </ul> <p>For the degree path, Service Nova Scotia and Internal Services (SNS-IS) will update its application and website to clearly state that a copy of a Master’s Degree certificate <i>and</i> a NSCASLP certificate must be included with a new application.</p> <p>For the apprenticeship path, SNS-IS will clearly indicate on the application and website that proof of apprenticeship completion from a licensed hearing aid dealer is required with the application. The application and website will also state that SNS-IS will refer their contact information to ILE to arrange for examination and upon notification of passing, SNS-IS will arrange for practical examination via NSHSC.</p> <p>The application and website will specifically note that all, including those who have obtained their credentials outside Canada, may apply under the apprenticeship path.</p> <p>SNS-IS has confirmed with Labour Mobility that requiring a permanent civic business address does not impede labour mobility requirements under the CFTA.</p>		<p>8(3)) is the apprenticeship pathway – course of study, examinations and demonstrate competency. An alternative pathway (a broader standard that encompasses hearing aid sales) is the degree. NSCASLP is assessing to determine the applicant has met the NSCASLP standard, not the hearing aid sales standard.</p> <p>The plans to improve clarity on the website and application form are good.</p> <p>With regards to international applicants, is it possible that the international applicant could have completed the ILE before coming to NS? If so, apart from the regular process perhaps another process could be 1. Apprenticeship 2. Provide evidence of ILE with application 3. Practical exam. Registration with NSCASLP is a process they could begin before coming to Canada. They would</p>
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			SNS-IS will inform NSCASLP that as a third-party assessor, we will need to have an agreement established clearly defining their role and adherence to fair registration practices. NSCASLP would also be fully informed of our standards of competency for this permit.		need to visit the NSCASLP website for details. The final step in the application process would be for them to be employed by a licensed Hearing Aid Dealer.
<b>Update 1</b>					
<b>Update 2</b>					
<b>Update 3</b>					
<b>Update 4</b>					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 3, 6, 7(a), (c), 9(a), 16(a), (b) and (g)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
<b>Action required</b>	4	<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 information about registration requirements and how requirements are to be met by <b>applicants who received their qualification outside NS but within Canada</b> is clear and easily accessible in the public domain through print and electronic media.</li> </ul>	<p>Current standards for non-Nova Scotia Canadian applicants are the same as all applicants.</p> <p>The Hearing Aid Salesperson Permit webpage states all applicants must be 19 years of age or older and must be employed by a licensed Hearing Aid Dealer. In addition, they must meet <u>one of the following equivalent training requirements</u>:</p> <ul style="list-style-type: none"> <li>a master's degree in audiology <u>and</u> registration with the Nova Scotia College of Audiologists and Speech-Language Pathologists, or</li> </ul>	TBD	<p>For applicants who are not licensed elsewhere in Canada, the pathways could be the same as those proposed for international applicants in the comments on the first Action.</p> <p>The LM Coordinator has offered to assist with obtaining information on licensure in other jurisdictions and is available to advise</p>

		<ul style="list-style-type: none"> <li>- ensure that information about registration requirements and how requirements are to be met by <b>applicants registered in another Canadian jurisdiction</b> are based on certificate-to-certificate recognition and are clear and easily accessible on the public domain through print and electronic media.</li> <li>- provide clear instructions on what documentation must accompany applications</li> </ul>	<ul style="list-style-type: none"> <li>• a 6-month apprenticeship with a licensed hearing aid dealer <u>and</u> completion of the International Licensing Exam (ILE) <u>and</u> successful completion of the practical exam</li> </ul> <p>SNS-IS will research and investigate the policy and legislative options in recognizing registrations and licensure from other provinces, in compliance with the CFTA. Timelines will be determined once an option is decided upon.</p> <p>SNS-IS has confirmed with Labour Mobility that requiring a permanent civic business address does not impede labour mobility requirements under the CFTA.</p>		<p>regarding changes to legislation required to comply with the CFTA or to obtain a waiver under the CFTAIA, if necessary.</p> <p>In the meantime, Service NS should post a note to the website telling applicants who wish to transfer their license from another jurisdiction to contact the regulator, providing contact information. You can discuss eligibility for a streamlined process and contact the LM Coordinator to discuss any outstanding questions.</p>
<b>Update 1</b>					
<b>Update 2</b>					
<b>Update 3</b>					
<b>Update 4</b>					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 9(b), 16(3)(c)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
<b>Action required</b>	6	Areas of non-compliance to be addressed in an action plan are as follows:	To ensure a policy and practice is in place to accept alternative documentation where required documents cannot	February 1, 2022	As identified in the first action a copy of the degree and registration with NSCASLP

		<ul style="list-style-type: none"><li>- document guidelines that describe alternatives that would be acceptable when documentation that must accompany an application cannot be obtained for reasons beyond the applicant's control</li></ul>	<p>be obtained for reasons outside the applicant's control, SNS-IS will review existing templates and its regulatory flexibility in interpreting the regulation that applicants must "demonstrate to the Registrar's satisfaction that they meet the standards of competency." SNS-IS will explore consultation with subject matter experts to develop information sharing agreement(s) if necessary. SNS-IS will document any new processes and guidelines.</p> <p>SNS-IS will be sure to inform applicants in this position that the apprenticeship application path remains a viable licensing option.</p>		<p>are required. What if the applicant doesn't have a copy of the degree -would an affidavit suffice or perhaps confirmation from NSCASLP that they have established evidence of education? Guidelines that describe alternative documentation that could accompany an application for a Hearing Aid Salesperson permit should be established.</p> <p>There is a template policy that could assist with this development on the FRPA website: <a href="#">Fair Registration Practices - Resources for Regulatory Bodies   novascotia.ca</a></p>
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 16(3)(h)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments

<b>Action required</b>	8 & 9	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- document a description of the accommodation practices for applicants which includes: <ul style="list-style-type: none"> <li>- how to request an accommodation</li> <li>- guidelines regarding types of accommodations</li> </ul> </li> <li>- ensure that practices are adaptable if a new situation arises</li> </ul>	<p>To ensure accommodations are available for applicants with a physical disability or mental disability, SNS-IS will review existing templates and its regulatory flexibility in interpreting the regulation that applicants must “demonstrate to the Registrar’s satisfaction that they meet the standards of competency.” SNS-IS will explore consultation with subject matter experts to develop information sharing agreement(s) if necessary. SNS-IS will document any new processes and guidelines.</p> <p>SNS-IS will be sure to inform applicants that the degree or apprentice application paths remain available to any individual 19+ who is employed by a licensed NS hearing aid dealer. The application and website will also note that any applicant requiring accommodation may request them.</p>	February 1, 2022	<p>Accommodation practices should be documented to describe the types of accommodation that could be made and how a person would qualify/request such accommodation.</p> <p>Accommodation practices are not intended to by-pass the competency requirements for a profession, but rather to facilitate the registration process for anyone who might have a demonstrated need.</p> <p>There is a template policy that could assist with this development on the FRPA website: <a href="https://www.novascotia.ca/fairregistration/practices-resources-for-regulatory-bodies/">Fair Registration Practices - Resources for Regulatory Bodies   novascotia.ca</a></p>	
<b>Update 1</b>						
<b>Update 2</b>						
<b>Update 3</b>						
<b>Update 4</b>						

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 7(a), (d), 16(3)(b) and (i)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	10 & 11	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- document all criteria that are used to assess whether requirements for certification have been met</li> <li>- ensure that information is clear and easily accessible in the public domain through print and electronic media.</li> </ul>	<p>The Hearing Aid Salesperson Permit webpage states all applicants must be 19 years of age or older and must be employed by a licensed Hearing Aid Dealer. In addition, they must meet <u>one of the following equivalent training requirements</u>:</p> <ul style="list-style-type: none"> <li>• a master's degree in audiology <u>and</u> registration with the Nova Scotia College of Audiologists and Speech-Language Pathologists,</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• a 6-month apprenticeship with a licensed hearing aid dealer <u>and</u> completion of the International Licensing Exam (ILE) <u>and</u> successful completion of the practical exam</li> </ul> <p>For the degree path, Service Nova Scotia and Internal Services (SNS-IS) will update its application and website to clearly state that a copy of a Master's Degree certificate from an accredited Canadian institution and a NSCASLP certificate must be included with a new application.</p> <p>For the apprenticeship path, SNS-IS will clearly indicate on the application and website that proof of apprenticeship completion from a licensed hearing aid dealer is required with the application. The application</p>	<p>July 1, 2021 (website) TBD (application)</p>	<p>The assessment criteria are the details pertaining to the requirements/qualifications you have listed. This is required to inform interested individuals about the knowledge and skills they would be required to have to qualify for the permit.</p> <p>Assessment criteria for the degree are the responsibility of NSCASLP and are not your legislated standard so you don't have to speak to that one. The website link you provide is enough. However, you do need to speak to the assessment criteria associated with the apprenticeship pathway. For example:</p> <ul style="list-style-type: none"> <li>- 6 month apprenticeship – requires employment with a NS dealer. Is this just to gain hours of experience at the discretion of the dealer or is there a common list of things that must be covered in this period of time?</li> <li>- ILE – what is the content of the exam? What is the pass mark?</li> <li>- practical exam – what is the content of the exam? What is the pass mark?</li> </ul>

			and website will also state that SNS-IS will refer their contact information to ILE to arrange for examination and upon passing, SNS-IS will then arrange for practical examination.		<p>The last two involve third-parties. Clearly explain who the third parties are and their role in the assessment process.</p> <p>All this information must be on a public website, a link can be provided to third party information.</p> <p>You should have formal agreements with any third-party assessor(s).</p>
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 8(c), 10(1)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	12	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- document a process to ensure that applicants who are not granted registration are provided with a written decision that includes the reasons why registration has been denied</li> </ul>	<p>SNS-IS will develop and document an internal process that ensures denied applicants receive a decision in writing which includes:</p> <ul style="list-style-type: none"> <li>• an explanation of the reasons for the denial</li> <li>• referral to NSCASLP and NSHSC for training opportunities</li> </ul>	July 1, 2021	A reasonable plan to address the current gap in registration practices.

		<ul style="list-style-type: none"> <li>- ensure that information about the internal review process is provided to applicants who have not been granted registration.</li> </ul>	<ul style="list-style-type: none"> <li>• information about the internal review process (i.e. the Advisory Board).</li> </ul>		
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 8(d) and 16(3)(k)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	13	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- consider opportunities that might be available to support future success such as referral to a relevant training program, practice exam, etc.</li> <li>- provide information with respect to measures or programs that may be available to assist unsuccessful applicants in obtaining certification, at a later date</li> </ul>	<p>SNS-IS will develop and document an internal process that ensures denied applicants receive a decision in writing which includes:</p> <ul style="list-style-type: none"> <li>• an explanation of the reasons for the denial</li> <li>• specific referral to NSCASLP and NSHSC for training opportunities</li> <li>• information about the internal review process (i.e. the Advisory Board).</li> </ul>	July 1, 2021	A reasonable plan to address the current gap in registration practices and connects with the previous action item.
Update 1					

Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 7(a), 10(1)(2)(4) and 16(3)(m)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	14 & 15	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- document a clearly defined process for an internal review of the registration decision which includes: <ul style="list-style-type: none"> <li>- procedures</li> <li>- timeframes</li> <li>- opportunities the applicant has to provide new information and to make submissions in support of their position (e.g. documented evidence, hearing, etc.)</li> </ul> </li> <li>- ensure that information on the internal review process is clear and easily accessible in the public domain through print and electronic media</li> <li>- document the timeline and process by which an</li> </ul>	<p>Section 8 of the Direct Sellers Regulations states:</p> <p><i>8 (1) In determining whether to grant, refuse, cancel or reinstate a Category H1 or H2 direct seller's permit or a salesperson's permit, the Registrar may, if the Registrar considers it necessary, establish an Advisory Board consisting of 4 members, as follows:</i></p> <p><i>(a) the Registrar, or another person appointed by the Registrar as the representative of the Registrar;</i></p> <p><i>(b) 1 member selected and appointed by the Registrar to represent the hearing-aid industry;</i></p> <p><i>(c) 1 member selected and appointed by the Registrar to represent the medical profession;</i></p> <p><i>(d) 1 member selected and appointed by the Registrar to represent hearing-aid users.</i></p> <p><i>(2) After the Advisory Board referred to in subsection (1) considers any matter submitted to it by the Registrar, the Board shall make a recommendation to the Registrar in writing, and the</i></p>	February 1, 2022	<p>A reasonable plan to address the current gap in registration practices.</p> <p>There is a template policy that could assist with this development on the FRPA website: <a href="#">Fair Registration Practices - Resources for Regulatory Bodies   novascotia.ca</a></p>



		<p>applicant who has been denied registration is informed about the procedures and time frames for the internal review.</p> <p><i>Registrar shall take such recommendation into consideration when making his decision.</i></p> <p>With this authority in place, SNS-IS will develop and document a plain language process which details the steps applicants may take to request a review and submit additional documentation. Instructions and timelines for the process will be publicly available and communicated to denied applicants. Decisions and rationale will be provided to applicants in writing.</p> <p>Under Subsection 3(4) of the <i>Direct Sellers' Regulation Act</i>, a deputy registrar may perform any of the duties and exercise any of the powers of the Registrar as directed by the Registrar. A policy and process will be created and documented to ensure a Registrar or Deputy Registrar does not participate in an internal review of their own decision</p>			
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 12 and 16(3)(j)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	16	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- develop and document a clearly defined process</li> </ul>	SNS-IS will develop and document a plain language process which details the steps applicants may take to request access to their records, as well as any restrictions or associated fees.	July 1, 2021	A reasonable plan to address the current gap in registration practices.

		under which requests for access to records will be considered, including: - the process by which an applicant may make a request - any limitations with regards to access - any fees associated with the request	Contact information for the Office of the Information and Privacy Commissioner for Nova Scotia may be provided as well.		There is a template policy that could assist with this development on the FRPA website: <a href="#">Fair Registration Practices - Resources for Regulatory Bodies   novascotia.ca</a>	
<b>Update 1</b>						
<b>Update 2</b>						
<b>Update 3</b>						
<b>Update 4</b>						

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES				
Sections 10(5) and 16(3)(n)						
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments	
<b>Action required</b>	17 & 18	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> <li>- document the process that is used to ensure that no one who acted as a decision-maker in a registration decision may act as a decision-maker in an internal review of the same decision</li> <li>- include in the description of the internal review process a</li> </ul>	<p>SNS-IS will develop and document a plain language process which details the steps applicants may take to request a review and submit additional documentation.</p> <p>Instructions and timelines for the process will be publicly available and communicated to denied applicants. Decisions and rationale will be provided to applicants in writing.</p> <p>This process will include the requirement that no one who acted as a decision-maker will take part in the internal review process and will contain a clear statement to that effect.</p>	February 1, 2022	A reasonable plan to address the current gap in registration practices and connects with actions 14 & 15 above.	

		statement to the effect that no one who acted as a decision maker in a registration decision may act as a decision maker in an internal review of the same decision	Under Subsection 3(4) of the <i>Direct Sellers' Regulation Act</i> , a deputy registrar may perform any of the duties and exercise any of the powers of the Registrar as directed by the Registrar. A policy and process will be created and documented to ensure a Registrar or Deputy Registrar does not participate in an internal review of their own decision.  SNS-IS will consult with Justice to determine whether to implement policy that the Registrar must accept the recommendation of the Advisory Board, or to amend the Regulations to formal referral to the Ministerial level.		
<b>Update 1</b>					
<b>Update 2</b>					
<b>Update 3</b>					
<b>Update 4</b>					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
<i>Sections 10(3)</i>					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
<b>Action required</b>	19	Areas of non-compliance to be addressed in an action plan are as follows: <ul style="list-style-type: none"> <li>- ensure that the internal review process includes a requirement for decision makers to provide applicants with a written decision that includes reasons</li> <li>- the internal review process describes the timeframe for a</li> </ul>	<p>SNS-IS will develop and document an internal process requiring the Advisory Board to provide a written decision and rationale within an established period of time.</p> <p>Instructions and timelines for the process will be communicated to denied applicants.</p>	February 1, 2022	A reasonable plan to address the current gap in registration practices.

		decision to be communicated to the applicant			
<b>Update 1</b>					
<b>Update 2</b>					
<b>Update 3</b>					
<b>Update 4</b>					

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>SNS-IS will consult other regulatory bodies under FRPA and research external options for training on conducting internal reviews.</p> <p>A training plan will be developed and documented to ensure accepted standards of formal review practices, and training will be provided to any individuals who may participate on the Advisory Board.</p>	February 1, 2022	<p>A training plan for those involved in decision-maker must be documented. Training could include elements such as:</p> <ul style="list-style-type: none"> <li>- training on regulatory requirements for the permit</li> <li>- assessor training</li> <li>- defensible decision-making</li> <li>- cultural competency</li> </ul>
<b>Update 1</b>					
<b>Update 2</b>					
<b>Update 3</b>					
<b>Update 4</b>					