
Nova Scotia College of Dispensing Opticians

Fair Registration Practices Act (FRPA)
Review Report
September 2021

Province of Nova Scotia



EXECUTIVE SUMMARY

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

The Review Officer worked with the Nova Scotia College of Dispensing Opticians (NSCDO) over a period of four months to complete this review. Questions to probe the status of registration practices were posed, the regulator engaged in a process of self-examination and provided written responses to the questions (see Analysis of Registration Practices). Responses were examined by the Review Officer and measured against the standard set forth in the FRPA to identify any gaps in registration practices. Based on this process, the Review Officer has determined that 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 Regulatory Body and an action plan to address some high priority gaps moving forward.

This is an initial review of the registration practices for Dispensing Opticians. The registration process depends heavily on a third party, the National Alliance of Canadian Optician Regulators (NACOR), however the Dispensing Opticians Act and Regulations give NSCDO authority over all registration decisions. This review has identified that there are gaps in registration practices which have a significant impact on transparency. Other gaps related to procedural fairness point to the need for further process and policy development.

The Nova Scotia College of Dispensing Opticians 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; and
- Provide information setting out any fees for registration, even if those fees are \$0; and

- 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; and
- Develop a policy on how to work with applicants who may require accommodations during the registration process; and
- Document all criteria that are used to assess whether requirements for certification have been met, including the role of third-parties; and
- 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; and
- 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.

These actions are accompanied by a commitment to increase transparency by ensuring that registration practices are in plain language, fully accessible and available in the public domain. NSCDO has developed some detailed plans for action and intends to implement actions associated with transparency by October 2021. Actions associated with procedural fairness and policy development are expected to be complete by November 2021. These are aggressive timelines which may require some adjustment for Board approval and consideration for any by-law amendments that may be required to implement the changes.

The Nova Scotia College of Dispensing Opticians 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 September of 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 46 [regulatory bodies](#) in Nova Scotia, covering over 57 occupations as well as 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

Registrar

Nova Scotia Dispensing Opticians Act : [NSCDO | Opticians](#)

Membership:

262 Total current members as follows;

Dispensing Optician License only: 165;

Dispensing and Contact Lens 81;

16 Non-Practicing

NOTE: A candidate must hold a NS Dispensing Opticians license before they can be licensed as a Contact Lens Fitter. NS will allow students to complete both licenses simultaneously.

Student Opticians:

Student Opticians are separately counted and there is a total of 31 student opticians as follows:

Dispensing; 22.

Dispensing and Contact Lens 9.

NOTE: A candidate must hold a NS Dispensing Opticians license before they can be licensed as a Contact Lens Fitter. However, the NSCDO will allow students to complete both licenses simultaneously.

Occupational Profile: Dispensing Opticians measure and fit contact lenses and eyeglass frames based on prescriptions written by ophthalmologists or optometrists. They take precision measurements of eyes using pupilometer and other devices to ensure proper fit of eyeglasses or contact lenses. They often work alongside Optometrists or Ophthalmologists can operate a Dispensary as a stand-alone service. Eye checkups are conducted by an Ophthalmologist or Optometrists, while Opticians will fit patients/clients for eyewear or contacts. Thus, there is a service/retail component to the role.

Role of Regulating Body: The Nova Scotia College of Dispensing Opticians is the health regulatory body for all Opticians in Nova Scotia. The College is responsible for regulating Opticians in the public interest through registration, licensing, continuing education, and the establishment of a professional code of conduct in accordance with the Dispensing Opticians Act of Nova Scotia.

In order that the public interest may be served and protected, the objective of the College are: to regulate the practice of optical dispensing through registration, licensing and the establishment of a professional conduct process in accordance with this Act and the regulations; establish, maintain and develop standards of professional practice among its members; establish, maintain and develop standards of professional ethics and a code of conduct for its members; and administer this Act and perform such other duties and exercise such other powers as are imposed or conferred on the Board by or under any Act.

Link to the Application site for registration purposes:

New Candidate Application: [Application for License or Registration.pdf \(nscdo.ca\)](#)

Student Application: [NSCDO Student Application for License or Registration.pdf](#)

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 Nova Scotia College of Dispensing Opticians responses to the FRPA Review Survey are detailed below, along with the Review Findings determined by the Review Officer in accordance with the Act.

SECTION I: INFORMATION AND REGISTRATION PROCEDURES

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

QUESTION 1

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

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

RESPONDENT ANSWER	Use the chart provided to identify each type of license issued. In each column next to the license type, identify the qualifications, documentation required, a step by step overview of the registration process, and communication of information.				
LICENSE TYPE	QUALIFICATIONS (LIST)	DOCUMENTATION (LIST)	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)	
<ul style="list-style-type: none"> • New Candidate • A) Dispensing Optician • B) Contact Lens fitter • This is a student optician applying to become a registered member. 	<ul style="list-style-type: none"> • Successful completion of the Dispensing Optician (DO) and/or the Contact Lens fitter (CLF) program at a recognized Canadian school. • Educational Programs - Accreditation Canada • For the Contact Lens Fitter (CLF) License, Candidate must hold a DO license or complete the CLF program in tandem with the DO program. Several provinces have a dual license so many students will complete both programs simultaneously. The NSCDO allows students to complete both as well, but students must successfully complete the DO portion in order to become licensed as a CLF . Students who successfully complete the CLF portion but who do not successfully pass the DO 	<ul style="list-style-type: none"> • Exam Marks • NOTE: Official marks are submitted to the NSCDO by NACOR. NACOR submits both the Dispensing Optician and Contact Lens Fitter marks. • NSCDO New Candidate Application Form • Proof of employment • Proof of insurance 	<ul style="list-style-type: none"> • Student must complete the application form for NEW CANDIDATE with the NSCDO • Exam Marks are forward from NACOR to the NSCDO. • Student must provide Proof of Insurance (if not paid by the employer) • Student must pay the registration fee 	<ul style="list-style-type: none"> • NACOR provides list of Students who wrote exams • NSCDO sends email to students advising that marks are in • 1) FOR STUDENTS WHO HAVE SUCCESSFULLY COMPLETED THE EXAM/S: • NSCDO emails students individually advising that marks were received (NOTE: students are also notified by NACOR that they were successful or not) • NSCDO provides link to the NEW CANDIDATE application form • NSCDO advises regarding the license fee amount and payment options: Credit, cheque/money order or cash • STUDENT WHO HAD AN UNSUCCESSFUL EXAM ATTEMPT: • The NSCDO contacts the student by email advising of the unsuccessful attempt and offers option of remaining as a student optician until the student successfully completes the exam/s. • The NSCDO reminds the students that student renewal is August 31 annually and that student must renew at that time. 	

			<ul style="list-style-type: none"> • The NSCDO application form has a section that asked for employer information and insurance information 		<ul style="list-style-type: none"> • NOTE: most students are aware that they were unsuccessful as NACOR would have sent the marks to them just before sending the information to the NSCDO. • ONCE ALL INFORMATION IS RECEIVED FROM THE NEW CANDIDATE: • Once application form, Official Marks and payment are in place: • 1) New Candidate record is set up in the records system • Member Portal Username and password are created • This allows them to renew and pay online. This process was instated for the 2020 annual license renewal • License number is created and added to the new candidate record • Certificate is generated • PDF of Certificate/s is generated and emailed to new Candidates for temporary display at place of employment. • New candidate package with Hard copy certificate/s and letter with username and password are sent to the New Candidate • Once all documents are in the process is normally completed within 10 business days • .
<ul style="list-style-type: none"> • Student Registration 	<ul style="list-style-type: none"> • Student must be in the process of applying to a recognized school offering the Opticians program. • Educational Programs - Accreditation Canada 	<ul style="list-style-type: none"> • Application form • Sponsorship form • Pay fee. 	<ul style="list-style-type: none"> • Complete the student application form. • Provide Sponsorship form signed by Sponsoring Optician. 	<ul style="list-style-type: none"> • Registrar reviews application • Emails liaison/contact at the respective school to confirm receipt and approval of application. • PDF Certificate emailed to the student. • Hard copy certificate mailed to place of employment for display at place of employment. 	

		<ul style="list-style-type: none"> • Most Nova Scotia students attend either the Northern Alberta institute of technology in Alberta or Oulton College in New Brunswick. • Each individual school would have its own admissions requirements that the applicant must meet before being admitted. • Students are required by the schools to be simultaneously registered with NSCDO before they can be admitted. • Verification of student registration with the NSCDO can be provided as follows: <ul style="list-style-type: none"> • 1) by the student requesting the NSCDO provide a Letter of Good Standing to the School • 2) the School contacting the NSCDO by email to verify that the student has registered and is in Good Standing with the NSCDO. • To be in Good Standing with the NSCDO, the student must: <ul style="list-style-type: none"> • 1) Must provide a Sponsorship form signed by the Optician sponsoring him/her. • Sponsors agree to mentor the student optician. It is a form of apprenticeship. • A student must have a sponsor in order to register with the NSCDO. • Students without a sponsor may contact the Registrar who will send out a communication to current members 		<ul style="list-style-type: none"> • Send in to the NSCDO with payment or pay with credit card by calling the NSCDO office. • Sponsorship Agreement.pdf (nscdo.ca) • NSCDO Student Application for License or Registration.pdf • Registrar and the School liaison/contact confer that student is registered (by email) 	<ul style="list-style-type: none"> • Letter sent welcoming students and explaining process to remain a student optician in good standing with the NSCDO and the annual student renewal process. • NOTE: students are not currently set up in the system for portal access. This is something I am working on providing to student opticians. This would allow them to renew their registration and pay online, like full registered members.
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		<p>asking if anyone is looking to sponsor a student.</p> <ul style="list-style-type: none"> • Sponsors do not receive remuneration, but they do receive 2.0 continuing education credits for the sponsorship. • Must pay the fee. • NOTE: the Schools are in contact with the NSCDO for the initial application process, the student renewal process and the exam process. • The education requirements for Opticianry are based on determined learning outcomes as established by the regulatory agencies of each province. Currently all provinces other than Quebec have adopted the national opticians competencies. 			
	<ul style="list-style-type: none"> • Non-Practising license • Not a separate license; it is the method by which a member can take a hiatus from working as an optician without losing his/her license status. Non-Practicing members may not actively 	<ul style="list-style-type: none"> • Must be a member in good Standing with the NSCDO. 	<ul style="list-style-type: none"> • Application for Renewal 	<ul style="list-style-type: none"> • The process is the same as the application for renewal. • There is an area online on the renewal process that the member checks and the member must state that he/she will not practice as an Optician in Nova Scotia while under the non-practicing status 	<ul style="list-style-type: none"> • It is the same process as with the regular renewal, with the exception that we do not send renewal stickers for the Certificate. • Non-Practicing status is only allowed for up to three consecutive years. A member can apply to the non-Practicing status for a year then return and a year later apply again. Such as a maternity leave or when a member goes to work for a lens company for a year, or, as with the past couple of years, go to a neighboring province to help out with an Optician shortage. • For RENEWING members, renewal stickers are issued yearly to all who have fulfilled the requirements to renew. They are placed on the Certificate which is supposed to be displayed in a prominent location in public view at their

	<p>practice while under this status and must maintain Continuing education and Professional Development courses.</p> <ul style="list-style-type: none"> • This is a status does not require “approval” but may only be applied to for three consecutive years after which, the member must renew for active license status. • The only time a non-practicing status is denied is if the member is at the three-year maximum. 				<p>respective places of employment. NON-PRACTICING members are not sent renewal stickers.</p>
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COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body provides information about its registration practices in a clear and understandable form; and 				

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

QUESTION 2

Do you have a registration process for applicants who have international qualifications? If so, describe the process and include a list of the documentation an applicant must submit. How is information on the registration process communicated to applicants with international qualifications? Provide links to any information available on a publicly accessible website.

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

RESPONDENT ANSWER

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

LICENSE TYPE	DOCUMENTATION (LIST)	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)
<ul style="list-style-type: none"> • PLAR: Prior Learning and Assessment. The PLAR process is for any out-of-country applicants as well as applicants who may not possess formal Optician education, but who may have informal-experience within the field Out-of-country applicants usually have formal education and 	<ul style="list-style-type: none"> • Applicants outside of Canada: • Must complete and submit the PLAR application. • Documents required: • Official Educational transcripts • Educational certificates and diplomas: • Resumes: • Letters of reference: letters from former employers/supervisors/mentors • Licences/certificates of regulatory body registration: optical field or another related field • ICES or similar assessment if trained outside of Canada - Click on the following link to view the requirements. • http://www.bcit.ca/ices/general/requirements/ • Note: A PLAR application may be submitted without ICES but if the application is accompanied with insufficient evidence of education or it is difficult to verify authenticity of 	<p>How Requirements are met:</p> <ul style="list-style-type: none"> • Applicants must complete all the PLAR steps, pass the national exam, and register with the NSCDO before they are allowed to dispense eyeglasses or contact lenses in Nova Scotia. • The application process is completed in tangent with the National Alliance of Canadian Optician Regulators (NACOR). The application goes to the PLAR Committee for review and that committee will determine if there is enough information to warrant proceeding to the NACOR portion of the process. <p>If approved the applicant is informed that the application is being forwarded to NACOR.</p> <p>NACOR sets up a time for the *interview and exam and the applicant is notified and given an</p>	<ul style="list-style-type: none"> • Once the NACOR process is completed a Decisions and Reasons letter is sent by email as an attachment to the Registrar. The Registrar forwards both letters by email to the to the PLAR Committee Chair for information purposes The Registrar forwards by email the Decisions Letter to the applicant. Information links: http://www.bcit.ca/ices/general/requirements/ http://eriec.ca/resources/immigrants/credential-assessment/ http://www.language.ca/ind

<p>experience from another country.</p>	<p>documentation, the application may be rejected. Similar assessment services may be used. Click on the following link to view some other options. http://eriec.ca/resources/immigrants/credential-assessment/ Proof of English proficiency - if the applicant's first language is not English, proving proficiency will be required in one of the following.</p> <ul style="list-style-type: none"> • Canadian Language Benchmarks (CLB), a minimum of 7 in speaking, writing, reading, and listening. http://www.language.ca/index.cfm?Repertoire_No=2137991327 • International English Language Testing System (IELTS), min score of 7. https://www.ielts.org • Test of English as a Foreign Language (TOEFL), a minimum overall score of 81, with at least 19 in reading, writing, and listening, 24 in speaking. http://www.ets.org • Test of English for scholars and trainees (CanTEST), go to https://www.ielts.org 	<p>opportunity to adjust the dates/times, if necessary.</p> <p>NOTE: The interview process is being removed from the process. This is a Canada-wide change. New wording is forthcoming from NACOR.</p> <p>Once the applicant completes the exams, the NACOR PLAR committee will review the answers and, based on where the application may require further studies, make recommendations which are delivered in the "Decisions and Reasons" letter.</p> <p>The letters are sent to the Registrar and the Registrar forwards both letters to the NSCDO PLAR Committee Chair and forwards the Decisions Letter to the Applicant.</p>	<p>ex.cfm?Repertoire_No=2137991327 http://www.ets.org https://www.ielts.org</p>
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<p>If you do not have a process, please explain:</p>			

<p>COMPLIANCE CRITERIA</p>	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body provides information about its registration practices in a clear and understandable form to individuals who received their qualifications outside Canada; and • The regulating body identifies documentation of qualifications that must accompany an application; and • The regulating body explains the registration process and how requirements for registration are to be met; and • The regulating body explains how information is communicated; and • The regulating body provides information on a publicly accessible website; and • The regulating body provides copies of blank application forms for registration on a publicly accessible website. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not provide information about its registration practices in a clear and understandable form to individuals who received their qualifications outside Canada; or • The regulating body does not identify documentation of qualifications that must accompany an application; or • The regulating body does not explain the registration process and how requirements for registration are to be met; or • The regulating body does not explain how information is communicated; or • The regulating body does not provide information on a publicly accessible website; or • The regulating body does not provide copies of blank application forms for registration on a publicly accessible website.
<p>REVIEW FINDINGS</p>	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
<p>COMMENTS: REVIEW FINDINGS</p>	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>According to the PLAR Information PDF found online, the PLAR review is conducted by NSCDO, inclusive of a CGA test and interview. Information above indicates this process is now conducted by NACOR. The online PLAR flow chart is not exclusive to PLAR. The direct registration process and the transfer license process should be removed from the PLAR flow chart to avoid confusion. Ensure that information published online is up to date. There is a registration process available for internationally educated individuals, inclusive of documentation requirements, but it is not available in a clear and understandable manner. To fulfill requirements for transparency and procedural fairness information on registration practices must be clearly marked and publicly available for individuals who received their qualifications outside Canada.</p>

QUESTION 3

Do you have a registration process for applicants who are registered/licensed in another jurisdiction in Canada (CFTA transfers)? If so, describe the process and include a list of the documentation an applicant must submit. How is information on the registration process communicated to applicants who are CFTA transfers? Provide links to any information available on a publicly accessible website.

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

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

RESPONDENT ANSWER

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

LICENSE TYPE	DOCUMENTATION (LIST)	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)
<ul style="list-style-type: none"> Transfer Applicant - Known as ADVANCE CANDIDATE 	<ul style="list-style-type: none"> Applicant must be currently registered with another Optician Regulatory College within Canada Applicant must be in good standing with his or her current Regulatory College Applicant must provide to the NSCDO a Letter of Good Standing sent directly from appropriate official of the College from which the applicant is moving. Applicant must submit an Advanced Candidate Application form Out of Province Application.pdf (nscdo.ca) Continuing education credits, are not required for the registration process. 	<ul style="list-style-type: none"> Application is available online. Out of Province Application.pdf (nscdo.ca) Complete the application. Arrange to have the Letter of Good Standing sent to the Registrar. NOTE: The Letter of Good Standing provides the dates that the member has been registered, the license type/s and that there are no investigations or complaints. 	<ul style="list-style-type: none"> Once the application is completed and payment received, the advanced candidate is set up in the system and a certificate/s is created. A welcome package which includes the certificate, letter with username and password and information regarding the renewal process is sent to each new advanced candidate. <ul style="list-style-type: none"> Out of Province Application.pdf (nscdo.ca) <p>Communication is often by phone or email. Applicants will email or phone requesting an application.</p>

		They are only required for the renewal process.		Communication regarding documentation is provided by email, during the phone call or both.
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COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body has a streamlined process to license applicants certified in another Canadian jurisdiction that regulates the same occupation; and • The regulating body identifies documentation of qualifications that must accompany an application; and • The regulating body explains the registration process and how requirements for registration are to be met; and • The regulating body explains how information is communicated; and • The regulating body provides information on a publicly accessible website; and • The regulating body provides copies of blank application forms for registration on a publicly accessible website. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not have a streamlined process to license applicants certified in another Canadian jurisdiction that regulates the same occupation; or • The regulating body has additional material requirements that must accompany an application; or • The regulating body does not explain the registration process and how requirements for registration are to be met; or • The regulating body does not explain how information is communicated; or • The regulating body does not provide information on a publicly accessible website; or • The regulating body does not provide copies of blank application forms for registration on a publicly accessible website. 			
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p>			

	<input checked="" type="checkbox"/> Not compliant
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>There is a streamlined process to register applicants who are currently licensed in another jurisdiction. The term ‘Advance Candidate’ does not appear anywhere on the website other than in the form for these applicants. There is no explanation of the streamlined process available in a publicly accessible manner. To fulfill requirements for transparency and procedural fairness information on registration practices must be clearly marked and publicly available for individuals who are currently licensed in another jurisdiction.</p>

QUESTION 4

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

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

RESPONDENT ANSWER	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Describe and explain:</p> <p>We charge fees as follows:</p> <ul style="list-style-type: none"> A. Annual renewal for certificate of registration of a Dispensing Optician 525.00 B. Annual renewal for certificate of registration of a Dual license Dispensing Optician and Contact Lens Fitter 575.00 C. Registration of a New Candidate as a Dispensing Optician 200.00 D. Registration of a New Candidate as a Contact Lens Fitter 200.00 E. Registration of an Advanced Candidate -Dispensing Optician 525.00 F. Registration of an Advanced Candidate - Contact Lens Fitter 300.00 G. Student License Fees: Dispensing 50.00 H. Student License Fee for Contact Lens 50.00 I. Annual Student Provisional License Fee 50.00 J. Annual Non-Practicing License Fee 75.00 <p>ALL DOMESTIC FEES ARE LISTED ON EVERY APPLICATION FORM. PLAR: Registration and licensure fees an applicant would encounter to become licensed in Nova Scotia through PLAR: Application fee: \$225.00</p>
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	<p>CGA and Interview: Eyeglass only: \$685.00 CGA and Interview Eyeglass and Contact Lens: \$685.00 Student Licensing Fee for Dispensing, if recommended: \$50.00 Student Licensing Fee for Contact Lens, if recommended: \$50.00 Initial Registration of a PLAR Candidate as a Dispensing Optician: \$200.00 Initial Registration of a PLAR Candidate as a Contact Lens Fitter: \$200.00 Thereafter, candidates are subject to annual renewal fees due March 31st of each year as outlined above. Possible fees payable to outside organizations in conjunction with the PLAR process in Nova Scotia: Credential evaluation: varies NAIT online modules for upgrading, if recommended: \$335 per module NOS examination: Eyeglasses \$725 (payable to NACOR) NOS examination: Contact Lenses \$725 (payable to NACOR) https://nscdo.ca/pdfs/PLAR_Fee_Schedule.pdf</p>
<p>COMPLIANCE CRITERIA</p>	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body provides information setting out any fees for registration in a clear and understandable form; and • The regulating body describes the fees even if they are not applicable or are \$0; and • The regulating body provides information about fees on a publicly accessible website. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not provide information setting out any fees for registration in a clear and understandable form; or • The regulating body does not describe the fees even if they are not applicable or are \$0; or • The regulating body does not provide information about fees on a publicly accessible website.
<p>REVIEW FINDINGS</p>	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>

COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>The fees as stated do not align with those identified on the Out-of-Province application form, or the student application form, nor do the PLAR fees align with those posted on the website. There is a discrepancy between fee for Advanced and Renewal applicants (for the dual license). CFTA applicants cannot be charged more than NS applicants, for the same license type. The fees as stated are not the same as the fees stated in Schedule A of the By-laws. Fee information is not clear and understandable. The application forms and the by-laws all state different fees. To be compliant with the FRPA the regulating body must provide information in a public form setting out fees for registration in a clear and understandable manner.</p>
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QUESTION 5

When documentation cannot be obtained by an applicant for reasons beyond their control, do you advise the applicant about what alternative documentation could be supplied that may be acceptable to the regulating body? (Example: a sworn statement in lieu of full documentation.) If so, explain. Include specifics related to acceptable alternatives to required documentation as well as the process and circumstances under which an applicant may make a request for alternative information to be considered. Include a link to any published information, if available.

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

RESPONDENT ANSWER	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, please explain:</p> <p>In the instances of a PLAR applicant who cannot obtain a true original transcript/s due to rules and regulations of the country and or school, then we will accept a notarized/certified copy of the transcript or other document such as a transcribed document or transcript.</p>
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COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body advises applicants on alternative documentation that applicants may provide when they cannot obtain documentation for reasons beyond their control; and • The regulating body has guidelines to describe acceptable alternative information to be provided by applicants who cannot obtain documentation for reasons beyond applicants' control; and • The regulating body advises applicants about information required to consider a request to accept alternative documentation.
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	<p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not advise applicants on alternative documentation that applicants may provide when they cannot obtain documentation for reasons beyond their control; or • The regulating body does not have guidelines to describe acceptable alternative information to be provided by applicants who cannot obtain documentation for reasons beyond applicants’ control; or • The regulating body does not advise applicants about information required to consider a request to accept alternative documentation.
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>The response gives an example of one situation in which an original transcript cannot be obtained. It is not clear that applicants will be provided with this, or any other advice should they not be able to provide required documentation for reasons beyond their control. Step 6 in the PLAR process refers to rejection when it is difficult to verify authenticity of documents. There is no advise offered regarding alternatives. This process does not appear to be impartial or procedurally fair. To be compliant with the FRPA regulating bodies have a process that describes expectations regarding documentation and alternatives that would be acceptable when documentation cannot be obtained.</p>

QUESTION 6

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

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

RESPONDENT ANSWER

Yes

No

	<p>If yes, describe: Applicants will often call or email before going to the website. If the applicant sends an email requesting information on the registration/application process, I will respond providing written information, and a link to the appropriate application. If there is a phone call, I will answer questions and if they provide me with an email address, I will forward a copy of the link to the applicant. I use the same practice with student applicants as I do with Advanced Candidates. With PLAR there is usually quite a bit of communication back and forth given the amount of documentation required.</p>
<p>COMPLIANCE CRITERIA</p>	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body provides support to the applicant during the registration process; and • The regulating body describes the type of support provided to the applicant during the registration process; and • The regulating body provides information about the type of support provided to applicants during the registration process on a publicly accessible website. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not provide support to the applicant during the registration process; or • The regulating body does not describe the type of support provided to the applicant during the registration process; or • The regulating body does not provide information about the type of support provided to applicants during the registration process on a publicly accessible website.
<p>REVIEW FINDINGS</p>	<p>To be completed by the FRPA Review Officer:</p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
<p>COMMENTS: REVIEW FINDINGS</p>	<p>Comments, to be completed by the FRPA Review Officer:</p>

QUESTION 7

Do you have a documented policy and/or process to describe existing accommodation practices for applicants with a physical or mental disability? If so, provide a description. Include information on the types of accommodation that can be made, as well as an explanation for how an applicant would request an accommodation. Include a link to any published information, if available.

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

Person with a Disability: An individual with a disability is a person with a physical or mental impairment that limits one or more major life activities that the average person in the general population can perform.

Reasonable Accommodation: Reasonable accommodation is defined as a modification or adjustment to the application process or the environment that enables a qualified applicant with a disability to be considered for certification that will not:

- cause “undue hardship” to the application or examination process;
- bypass occupational requirements; or
- compromise accepted safety standards of the profession.

RESPONDENT ANSWER	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, describe:
COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body has a policy and/or process to describe existing accommodation practices for applicants with a physical or mental disability; and • The regulating body describes the types of accommodation, and how an applicant can request accommodation. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not have a policy and/or process to describe existing accommodation practices for applicants with a physical or mental disability; or • The regulating body does not describe the types of accommodation, and how an applicant can request accommodation.
REVIEW FINDINGS	To be completed by the FRPA Review Officer:

	<input type="checkbox"/> Compliant <input checked="" type="checkbox"/> Not compliant
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>Provincial Human Rights legislation states that membership in a professional body cannot be withheld for reasons of physical or mental disability. Ensuring impartial registration practices for all applicants and compliance with the FRPA requires that the regulating body have a description of existing accommodation practices (what is required to make a request and how that request will be considered) they make available to applicants.</p>

QUESTION 8	
<p>Do you have a documented process by which an applicant can request access to their registration records? If so, describe how an applicant can make this request, any exclusions to information that can be provided, and any fees that may apply. Include a link to any published information, if available.</p> <p>Alignment with the FRPA: <i>Sections 12(1) through (5) and 16(3)(j)</i></p>	
RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>If yes, describe:</p> <p>Students: we have a process, but it is not documented on the website. For Registered Opticians, they can log into the Member Portal to access their personal and employer data. If they wish to access the paper record, from when we were receiving paper renewal and application forms, they would make a request by email or in writing requesting access the records.</p>
COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body has an established process by which an applicant can make a request in writing for access to their registration records; and • The regulating body describes how an applicant can make a request, any exclusions to information that can be provided and any fees that may apply. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not have a documented process by which an applicant can request in writing for access to their registration records; or

	<ul style="list-style-type: none"> The regulating body does not describe how an applicant can make a request, any exclusions to information that can be provided, and any fees that may apply.
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p>

SECTION II: ASSESSMENT CRITERIA AND COMMUNICATION OF DECISION PROCESSES

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

QUESTION 9

Explain, in detail, the criteria used by the regulating body to assess if an applicant has met requirements to be registered/licensed. (Examples: competencies, pass marks, experience standards, etc.) Also, explain how this information is communicated to applicants. Provide links to information available on a publicly accessible website.

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

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

**RESPONDENT
ANSWER**

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

For student applications: the student must have a sponsor who is a current, licensed Dispensing Optician. The sponsor can also hold a contact lens license and sponsor a contact lens student.

Students applying as a New Candidate: Must have completed the courses from an accredited optical program in Canada, must have successfully completed exams with the approved pass mark.

Advanced Candidates/transfers between provinces in addition to the application must request a Letter of Good Standing be sent directly to the Registrar of the NSCDO.

Non-Practicing must be in good standing with the NSCDO and can apply for the non-practicing license no more than three consecutive years. PLAR see below.

Is a third party involved in the assessment process?

Yes

No

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

For PLAR candidates, the NSCDO collects the documents and once approved by the PLAR Committee for assessment, copies of the records are forwarded to NACOR for the interview process and the written exam. Please note, that the NACOR process is currently undergoing a change to some of its competencies. Namely, they are proposing that the interview portion of the assessment be removed, and scenarios be incorporated into the written portion of the CGA (Competency Gap Assessment) exam. Once the changes are approved by NACOR and each individual province, the new process will be updated on the NSCDO website.

COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body describes all criteria used to assess whether the requirements for registration have been met; and • The regulating body explains how information is communicated; and • The regulating body provides information on a publicly accessible website; and • The regulating body describes the role of third-party assessors (if applicable). <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not describe all criteria used to assess whether the requirements for registration have been met; or • The regulating body does not explain how information is communicated; or • The regulating body does not provide information on a publicly accessible website; or • The regulating body does not describe the role of third-party assessors (if applicable).
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>The criteria used to assess whether the requirements for registration have been met have not been fully explained. What is the approved pass mark on exam(s) required for licensure with NSCDO? What is the NSCDO PLAR Committee approving? – the criteria for approval to move to the NACOR interview and exam? Criteria used to determine eligibility for licensure are not available in a publicly accessible manner. The role of the third-party is described above, but not on the NSCDO website. To fulfill requirements for transparency and objectivity with regards to eligibility for licensure, a description of the criteria used for assessment and the role of third parties must be publicly available in a clear and accessible manner.</p>

QUESTION 10

Explain how you communicate registration decisions to applicants and the approximate length of time required to issue a registration decision. When registration is not successful, do you provide reasons? Describe the reasons why registration may not be successful.

Also, describe any information you provide on programs/services available to support the future success of applicants.

Alignment with the FRPA: *Sections 8(b), (c) and (d)*

RESPONDENT ANSWER	<p>Explain the registration decision communication process:</p> <p>The process is straight forward for students and as such, the only occasions where a student is denied is when they have not successfully passed the exams. I had an instance where a student took both the Dispensing Optician and Contact Lens exams simultaneously. The student passed the Contact Lens exam but was unsuccessful with the Dispensing Optician (DO) exam. In NS you must hold a DO license to hold a Contact Lens license. I contacted the student and informed her that she could not practice as a contact lens fitter until she successfully completed the DO exam, and we renewed her student license and sponsorship, so she would be allowed to continue as a Student Optician until she was able to sit the exam again. Likewise, when I had a student not successfully pass the DO exam, I contacted her and stated that it was a delay only and not the end of her career aspirations to be an Optician. We renewed her student license and she continued working with her sponsor until she was able to successfully complete the exam as the next sitting. We attempt to have a two-week or less, turn around from the time the application is complete to when an applicant is informed. It may take a little longer if the application is submitted during a peak time such as the membership renewal month (March 31). As needed, we will advise students of opportunities, such as online tutoring services.</p>
COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body explains the process they use to communicate registration decisions, and the timeframe; and • The regulating body provides written decisions to all applicants; and • The regulating body provides applicants with reasons when registration has not been granted; and • The regulating body provides information on programs/services available to support the future success of applicants, if applicable. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not explain the process they use to communicate registration decisions, and the timeframe; or • The regulating body does not provide written decisions to all applicants; or • The regulating body does not provide applicants with reason(s) when registration has not been granted; or • The regulating body does not provide information on programs/services available to support the future success of applicants, if applicable.
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input checked="" type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>A more complete answer to this question can be found in the Communication section of the response to questions 1 and 2, above.</p>

SECTION III: INTERNAL REVIEW/APPEAL PROCESS

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

QUESTION 11

Do you have a documented internal review process for applicants who disagree with the registration decision? Provide links to information available on a publicly accessible website.

If yes, how and when is the applicant informed of their right to an internal review of the registration decision? Once this information is communicated, how long does the applicant have to request an internal review?

If no, explain why you do not have an internal review process. If you do not have an internal review process, you do not need to complete the remainder of the questions about the internal review process.

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

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

**RESPONDENT
ANSWER**

Yes

No

If Yes, explain:

	<p>With PLAR there is a Decisions and Reasons letter. If the applicant is denied or even just disagrees with the number of courses, he/she is required to take there is an appeals process:- Appeal The applicant has a right to appeal the registration committee's decision. Appeals must be submitted in writing to NSCDO within 30 days of the date of the registration committee's decision letter. This information is located on the PLAR information page: PLAR Information.pdf (nscdo.ca)</p> <p>Continuing Members: Should there be an appeal for a non-renewal situation... for instance, a member failed to renew by the deadline, then that person could file an appeal in writing to the Registrar and the Registrar would advise the Board who would form the Appeals Committee and would review the situation. In one instance, a member had allowed his NS license to lapse for several years. He wrote a letter outlining what he had been doing (he had been in the field of Opticians, just not licensed) and the Board formed the committee and decided the terms that he would need to fulfill to be reinstated. It is like the PLAR assessment process.</p> <p>If No, explain why not:</p> <p>Students: With students they either pass the exams or they do not. If they pass, have an employer, they are approved. Between the educational institution, NACOR and the NSCDO there are many check points before a student gets to the point of applying for his/her license. Likewise, an Advanced Candidate would have a Letter of Good Standing from the Registrar of the Province from which they are transferring, so there are usually no issues with Advanced Candidates.</p>
<p>COMPLIANCE CRITERIA</p>	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body has a documented internal review process; and • The regulating body provides information on a publicly accessible website; and • The regulating body informs applicants about the internal review process and of the procedures and timeframes for the internal review. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not have a documented internal review process; or • The regulating body does not provide information on a publicly accessible website; or • The regulating body does not inform applicants about the internal review process; or • The regulating body does not inform applicants how long they have to submit a request for an internal review of the registration decision.
<p>REVIEW FINDINGS</p>	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>

COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>The Dispensing Opticians Act 10(1) says that an applicant who is refused registration may appeal. There is no qualifier for certain types of licenses. Other than a reference to an appeal in the PLAR process, there is no documented internal review/appeal process publicly available. Not all denied applicants are informed of their right to an appeal of the registration decision. To be compliant with the FRPA the regulating body must inform the public about their internal review processes and specifically inform denied applicants about the procedures and time frames.</p>
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QUESTION 12	
<p>Describe your internal review process. Provide a detailed description of the procedures in this process, including opportunities the applicant has to provide new information and to make submissions with respect to their internal review.</p> <p>Alignment with the FRPA: <i>Sections 10(1), (2), (4), 16(3)(m)</i></p>	
RESPONDENT ANSWER	<p>PLAR: Appeals must be in writing within 30 days.</p> <p>Members: there are very few times when they are not eligible to renew; there have been no such instances in the three years I have been in the Registrar’s role. If a member steps away, there is the option of moving to a non-practicing license for up to three years at a time. If the member maintains his/her continuing credits and renews yearly, then he/she will simply make application to move back to the practicing status by applying to renew to an active license. If the member has been under the non-practicing status for three years and chooses to not renew to active status, the license becomes in-active. Members can appeal to the committee to have his/her license reinstated in writing and it would follow the same process as outlined above. I had a member who became pregnant in her third year as non-practicing. She was allowed an extension due to the pregnancy.</p>
COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body describes a clearly defined process for an internal review of the registration decision which includes procedures and time frames for the internal review; and • The regulating body describes opportunities the applicant has to provide new information and to make submissions in support of their internal review (e.g. documented evidence, hearing, etc.). <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not describe a clearly defined process for an internal review of the registration decision which includes procedures and time frames for the internal review; or • The regulating body does not describe opportunities the applicant has to provide new information or specify how submissions are to be made.

REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>There is no description of internal review procedures and time frames, nor a description of opportunities the applicant has to provide new information and make submissions in support of their internal review. A process is outlined in the Dispensing Opticians Act 10(2) – (8) but it does not appear that this has been adopted as formal, consistent practice. To be compliant with the FRPA a regulating body must have a description of the internal review process available to applicants who are not granted registration, including opportunities provided to an applicant to make submissions respecting such review.</p>

QUESTION 13

Are the decision-makers for the internal review different from the decision-makers that were involved in the original decision? Does your documented process state this information? Explain the process that is used to ensure that internal review decision-makers are different from the original decision-makers.

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

RESPONDENT ANSWER	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Explain:</p> <p>The original decision is based on policy and is followed by the Registrar. Should an appeal be filed, it would be forwarded to the Appeals Committee. The Registrar is not a part of that Committee.</p>
COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body ensures that internal review decision-makers are different from the original decision; and • The regulating body has a documented statement in the internal review process regarding the separation of internal review decision-makers from the original decision-makers; and

	<ul style="list-style-type: none"> The regulating body explains the process used to ensure the separation of internal review decision-makers from the original decision. <p>Not compliant:</p> <ul style="list-style-type: none"> The regulating body does not have internal review decision-makers who are different from the original decision; or The regulating body does not have a documented statement in the in the internal review process regarding the separation of internal review/appeal decision-makers from the original decision-makers; or The regulating body does not explain the process used to ensure the separation of internal review decision-makers from the original decision.
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>The answer states that the Registrar is not part of the Appeals Committee. The Act 10(1) refers to a registration committee with members as determined by the Board. The Act does not state the make-up of the registration committee or make it clear that the Registrar will not be a part of this committee. A policy should be in place to ensure the separation of decision-makers. To be compliant with the FRPA the regulating body will ensure that no one who acted as a decision-maker in respect of a registration decision may act as a decision-maker in an internal review of the same decision.</p>

QUESTION 14

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

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

RESPONDENT ANSWER	<p><input checked="" type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If yes, please describe:</p> <p>The training is an informal process. It is based on the practices used with the PLAR process. The PLAR process is a nationally accepted practice/process. When it was created a committee was formed and representatives from each province had a seat on the committee as well as members of NACOR.</p>
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	<p>Professional consultants were brought in to assist in the facilitation of the policies and procedures and each provincial Board were provided opportunities to review the policies and procedures throughout the process. Further, each Provincial Board had to approve the PLAR process before it went live.</p> <p>The PLAR process is undergoing a review and the practice of interviewing the PLAR candidates is being eliminated. A member of the NSCDO Board is on the Committee and brings forward updates at the monthly Board meetings. Additionally, the Registrar attends all the national NACOR meeting specific to Registrars working for Optician Regulatory Colleges and we are filled in on the process, so that there is knowledge in many areas, eliminating the silo effect.</p>
COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The regulating body ensures that internal review decision-makers have received training on conducting an internal review; and • The regulating body describes the training. <p>Not compliant:</p> <ul style="list-style-type: none"> • The regulating body does not ensure that internal review decision-makers have received training on conducting an internal review; or • The regulating body does not describe the training.
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>The training plan described is specific to the PLAR process, not an internal review process for decision-makers who might be involved in the internal review. To be compliant with the FRPA a regulating body must ensure that internal review decision-makers have received training on conducting an internal review and that there be a description of the training provided.</p>

QUESTION 15

Explain how you communicate the result of an internal review to applicants and the approximate length of time required to issue the internal review decision. When the internal review is not successful, do you provide reasons?

Alignment with FRPA: *Sections 10(3)*

RESPONDENT ANSWER	<p>A Decisions and Reasons letter is prepared. It is provided to the Registrar for sending to the member and record-keeping purposes. The letter outlines the decision/outcome and explains how/why the Committee came to their decision. It could be that a candidate had been away for a year, and so the decision might be that they need to complete continuing education credits prior to being reinstated. It could be that a member was away for three years, and the Committee determined that there was change in the refraction segment of the profession. In this case, the Committee may determine that a course through NAIT or Oulton College is required before the license can be reinstated. In all cases, it is based on ensuring public safety, and ensuring that the member has the skill sets to best ensure a successful re-entry to the profession.</p> <p>The Committee strives to provide a two-week turn around time. This is based on Committee members holding full time jobs and needing adequate time to review the appeal and decide.</p>
COMPLIANCE CRITERIA	<p>Compliant:</p> <ul style="list-style-type: none"> • The internal review decision-maker provides the applicant written internal review decisions; and • The regulating body describes a reasonable timeframe within which internal review decisions are provided; and • The internal review decision-maker provides reason(s) to applicants who are not granted registration. <p>Not compliant:</p> <ul style="list-style-type: none"> • The internal review decision-maker does not provide the applicant written internal review decisions; or • The regulating body does not describe a reasonable timeframe within which internal review decisions are provided; or • The internal review decision-maker does not provide reason(s) to applicants who are not granted registration.
REVIEW FINDINGS	<p>To be completed by the FRPA Review Officer:</p> <p><input type="checkbox"/> Compliant</p> <p><input checked="" type="checkbox"/> Not compliant</p>
COMMENTS: REVIEW FINDINGS	<p>Comments, to be completed by the FRPA Review Officer:</p> <p>The answer describes communication of the original registration decision in relation to the PLAR process, not communication of a decision related to an appeal of the registration decision. In the absence of a documented internal review process, it is not clear that decisions on any appeals are being communicated. To be compliant with the FRPA the regulating body must communicate internal review decisions in writing with reasons (if the decision is not in the appellant's favour), within a reasonable timeframe.</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 the Nova Scotia College of Dispensing Opticians:

- Support provided to applicants: During the review it was noted that contact information and hours are on the website. Support could be improved by having a designated Registration portion on the website with information on registration practices including an explanation of forms, resources, links to accredited training programs, as well as registration policies. This would be an informational support for applicants and only more complex questions would need to be directed by email/phone. Some of these elements are already in the action plan to address the provision of information in a clear and understandable manner.

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. 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 \(novascotia.ca\)](https://www.novascotia.ca/frpa/resources-for-regulatory-bodies)

IV: ACKNOWLEDGEMENTS:

The Nova Scotia College of Dispensing Opticians 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:

X *Brigitte MacInnes*

Brigitte MacInnes, BA, BEd, MEd
Registrar, NSCDO
5991 Spring Garden Road, Suite 342
Halifax, NS
B3H 1Y6

APPENDIX A: ACTION PLAN

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

NAME OF REGULATING BODY: Nova Scotia College of Dispensing Opticians

INFORMATION ON REGISTRATION PRACTICES AS OF: 2021-06-10

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
Due Date	2021-09-15	2022-09-30	Click or tap to enter a date.	Click or tap to enter a date.	Click or tap to enter a date.
Actual Completed Date	2021-09-15	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 7(c), 9(a), 16(3)(a), (b), (e) and (g)</i>					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	1	Areas of non-compliance to be addressed in an action plan are as follows: <ul style="list-style-type: none"> - Address the deficiency in transparency by providing all details in a publicly accessible manner regarding 	Create a Registration Section of the NSCDO Website called "Applicants". Content to include: <ul style="list-style-type: none"> - Overview: General information on what an Optician does: <ul style="list-style-type: none"> i) Include information on both Dispensing Optician License and Contact Lens Fitter License 		A good plan to address gaps in registration practices pertaining to transparency.

		<p>registration requirements and how requirements are to be met</p> <ul style="list-style-type: none"> - create a registration section on the NSCDO website to provide information on registration practices in a clear and understandable form, inclusive of qualifications, documentation requirements and application process - ensure that the blank application forms are accessible from the registration section of the website. 	<ul style="list-style-type: none"> ii) List of Registration Fees - Information for the following 3 applicant types <ul style="list-style-type: none"> 1) Internationally Registered Applicant 2) Accredited Education Applicant 3) Unaccredited Education Applicant - Under each of the sections address how to apply as a student including: <ul style="list-style-type: none"> i) Include a section on applying as Accredited or Unaccredited applicant explaining the difference between the two ii) Include list of Accredited institutions iii) Include a section on Transfer Applications iv) Letter of Enrollment from the educational institution v) Letters of Standing, if necessary, from education institution vi) Application Form both printable and smart form vii) Proof of Sponsorship and Employment viii) Requirements to become an optician both provincial and national ix) Include section on Examinations x) Include a section on how to register as an Optician once exams are passed xi) Section with instruction regarding how to appeal a decision 	<p>Complete by October 11, 2021</p>		
Update 1						
Update 2						
Update 3						
Update 4						

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
<i>Sections 7 (c), 9(a), 16(3)(b), (e) and (g)</i>					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	2	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - To address the requirement for transparency and procedural fairness document accurate information on the PLAR process and how requirements for registration are to be met by applicants who received their qualifications outside of Canada - Designate a portion of the registration section of the NSCDO website for internationally educated applicants providing information on the PLAR process in a clear and understandable form, inclusive of documentation requirements and application process, with easy access to the relevant application form, as well as links to helpful information 	<ul style="list-style-type: none"> - Work with the PLAR committee to improve transparency as regards Applicants from outside of Canada - Provide the steps required to become a Canadian Optician in clearer language and a user-friendly format - Create a new Header-Section - Change the section title from PLAR to International Applicants - Provide a detailed list with descriptions of required documents 	Complete by October 11, 2021	A good plan to address the current gap in registration practices.
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
<i>Sections 3, 6, 7 (c), 9(a), 16(3)(b), (e) and (g)</i>					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments

Action required	3	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - Address the deficiency in transparency by documenting in a publicly accessible manner information about a streamlined registration process and how requirements for registration are to be met by applicants who are registered in another jurisdiction in Canada - Designate a portion of the registration section of the NSCDO website for applicants licensed in another jurisdiction (Advance Candidate) providing information on a streamlined process in a clear and understandable form, with easy access to the relevant application form. 	<p>Under the Applicant section include:</p> <ul style="list-style-type: none"> - Description of Transfer Applicant from Outside of Nova Scotia - List of documents required including: <ul style="list-style-type: none"> i) Application Form ii) Letter of Good Standing from Current province iii) Proof of Insurance - Information on Fee Payment - Change the fees on website to align with the NS applicant fee 	<p>Complete by October 11, 2021</p>	<p>A good plan to address the current gap in registration practices.</p>
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
<i>Sections 7(f), 16(3)(d)</i>					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	4	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document accurate and consistent information about any fees for registration 	<ul style="list-style-type: none"> - Create a dedicated section that outlines fees for all application, registration, and service processes 		<p>A good plan to address the current gap in registration practices.</p>

		- communicate detailed information about fees in a publicly accessible manner	- Ensure the fees align with the NSCDO By-Laws	Complete by October 11, 2021		
Update 1						
Update 2						
Update 3						
Update 4						

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES				
<i>Sections 9(b), 16(3)(c)</i>						
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments	
Action required	5	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document guidelines that describe alternative documentation an applicant may provide when required documentation cannot be obtained for reasons beyond their control - document guidelines for applicants about information required to consider a request to accept alternative documentation 	<ul style="list-style-type: none"> - Provide Alternative or substitutions for documentation that may be allowed on a case-by-case basis. - List the process for applying for an exception - Create, post and describe an Exception Request Form 	Complete by October 18, 2021	<p>A reasonable plan to address the current gap in registration practices. A template policy that can be used as a guideline to develop criteria around alternative documentation can be found on the Fair Registration Practices website: Fair Registration Practices - Resources for Regulatory Bodies novascotia.ca</p>	
Update 1						
Update 2						
Update 3						
Update 4						

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

	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	7	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document a description of existing accommodation practices for applicants with physical or mental disabilities which includes: - what is required to request an accommodation - how the request will be considered and communicated back to the applicant. 	<ul style="list-style-type: none"> - Create a section on the website regarding accommodations - Include how to declare as an applicant with physical or mental disabilities - Create content regarding existing accommodation practices - Provide an application form for Accommodation Requests - Describe how the request will be processed and by whom (e.g, Board, Registrar, Other) 	Complete by November 1, 2021	A reasonable plan to address the current gap in registration practices. A template policy that can be used as a guideline to develop a description of accommodation practices and advise applicants how to make such a request can be found on the Fair Registration Practices website: Fair Registration Practices - Resources for Regulatory Bodies novascotia.ca
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
<i>Sections 7(d), 16(3)(i)</i>					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	9	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document detailed information on the criteria used to assess whether requirements for registration have been met such as examination pass marks, criteria used for PLAR Committee approval 	<p>Create a section header Registering As An Optician Provide application form List other requirements: Exams Marks from NACOR Credit Card information Form Instructions to apply and pay online</p>		This plan may need to be enhanced to ensure that information on criteria used to assess whether requirements for registration have been met are clear. This would include full disclosure regarding the competencies or standards of practice and what level an applicant

		- communicate information about assessment in a publicly accessible manner including information on the role of NACOR with links to their standards of assessment.	Proof of Employment Proof of Insurance	Complete by November 30, 2021	would have to meet to be deemed qualified. Additionally, the role of the third-party should be clearly explained on the website, with links to their website information.
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 7(a), 10(1)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	11	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - Ensure that a process is in place for an internal review of the registration decision - Communicate information about the internal review process in a publicly accessible manner - Document how and when applicants who have not been granted registration are informed about the internal review process - Document how an applicant who has not been granted registration can initiate an internal review of the registration decision 	<p>Create section header “Appeals”</p> <p>Include Subsection “Application Appeal Process”</p> <p>Include information on the NSCDO Appeals Committee and ensure that information is easily accessible to the public including: Member committee names and titles</p> <p>Under each Application type (International, Accredited and Unaccredited)</p> <p>Will provide information on How to file an appeal Content to include:</p> <ul style="list-style-type: none"> - the overall process of an appeal/review <p>Timelines:</p> <ul style="list-style-type: none"> - For applicant to appeal the decision - For committee to respond - For decision by the committee 		A reasonable plan to address the current gap in registration practices. Ensure that any applicant who is denied registration is provided with information on the appeal process with their denial letter.

			Provide content on how the decision will be communicated back to the appellant	Complete by November 30, 2021	
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 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	12	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document a detailed internal review policy/process that includes the following: <ul style="list-style-type: none"> o procedures - how the internal review process works o opportunities for the applicant to provide new information and to make submissions in support of their internal review (documented evidence, hearing, etc.) 	<p>Under the Appeals Section Create rules, regulations, and policy for the Registration Appeals Committee</p> <p>For the Applicant Provide content on the overview of the Appeals Process</p> <p>Provide details regarding documentation required by the applicant/appellant for the application</p> <p>Create a “Registration Decision Appeals” application form</p> <ul style="list-style-type: none"> - Form to include area for submission of additional documents that may support the appeal <p>Regarding the Committee: Provide opportunity of a “discovery” meeting where the applicant can meet in person with the Committee to provide clarity</p>		<p>NSCDO would not be able to create regulations on their own, but an appeals policy outlining the appeal process must be developed. The process, when developed, must include all the details as listed in the column for Areas of noncompliance to be addressed. There is a template policy that can be used to help guide development that can be found on the Fair Registration Practices website: Fair Registration Practices - Resources for Regulatory Bodies novascotia.ca</p>

		<ul style="list-style-type: none"> timeframes associated with the process 	<p>Allow applicant to have emotional support person when at the discovery meeting</p> <p>The section will provide clearly laid out timelines by which the processes must be completed</p>	Complete by November 30, 2021	
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
<i>Sections 10(5) and 16(3)(n)</i>					
	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"> ensure that internal review decision-makers are different from the original decision-makers document the process that is used to ensure that no one who acted as a decision-maker in a registration decision may act as a decision-maker in an internal review of the same decision Include in the description of the internal review process a statement to the effect that no one who acted as a decision maker in a registration decision may act as a decision maker in an internal review of the same decision 	<p>To form an Appeals Committee</p> <p>Under the Appeals Section there will be information on how the committee is formed and that it will not include the original decision maker.</p> <p>A statement of declaration that no one who was a part of the original decision-making process will be part of the appeal committee.</p>	Complete by November 30, 2021	A reasonable plan to address the current gap in registration practices.
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 11, 16(3)(p)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments
Action required	14	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - ensure that individuals acting as decision-makers in internal reviews receive training on conducting an internal review. - develop a plan and document training provided to individuals who make internal review decisions 	<p>Provide training opportunities for all Appeals Committee members</p> <p>Make the training mandatory to be part of the committee</p> <p>Will develop and provide each Appeals Committee member with a manual on the Appeals Committee process</p> <p>The manual will be part of the training process and provided to the member upon completion of the training.</p> <p>A review will be necessary to determine who to bring in to do the initial training and it will be used as a “Train the Trainer” facilitation.</p>	Complete by November 30, 2021	A reasonable plan to address the current gap in registration practices. Ensure that training is documented and any other training that is relevant is added to the plan.
Update 1					
Update 2					
Update 3					
Update 4					

ALIGNMENT WITH THE FRPA		OBSERVATIONS, RECOMMENDATIONS AND REGULATOR RESPONSES			
Sections 10(3)					
	Question	Areas of non-compliance to be addressed	Regulator Action Plan	Dates for Completion	FRPA Review Officer Comments

Action required	15	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document the process used by internal review decision makers to communicate internal review decisions that includes the following: <ul style="list-style-type: none"> o timeframe for decision-making o all decisions are provided in writing o reasons for the internal review decision. 	<p>The Appeals Section will include timelines for the following: Timeframe in which the appeal must be submitted by the applicant What information is required for the appeal to be reviewed: i.e. original decision, documents previously submitted Additional supporting documents not previously submitted A Reasons and Decisions Letter by the Committee Chair to be provided to the applicant outlining the appeal, the decision, and the reason for the decision.</p> <p>If the decision is in favor of the applicant, then the next steps will also be addressed Copy to be sent to the Registrar for record purposes and to the applicant Action items may be outlined such as the Registrar is to implement the Registration process with the Applicant.</p>	<p>Complete by November 30, 2021</p>	<p>A reasonable plan to address the current gap in registration practices.</p>
Update 1					
Update 2					
Update 3					
Update 4					