2016 Registration Review Report Opticians of Manitoba



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Executive Summary

This Registration Review Report consists of the Manitoba Fairness Commissioner review of progress by the Opticians of Manitoba (OOM) on the fair consideration of individuals applying for registration¹ and licensing, focusing on applicants educated outside of Canada. The analysis is based on the Office of the Manitoba Fairness Commissioner's (OMFC) registration review including a fair practice analysis, identification of progress opportunities, and confirmation of actions to progress in fair registration practice.

The Fairness Commissioner has identified opportunities to achieve timely and effective registration and licensing through recognition of professional work experience and opportunities for supervised practice.

Opticians of Manitoba is a progressive regulator. An example of their efforts to continually evolve their practices is their work with other provincial regulatory authorities to update National Competencies for Opticians and from this to develop detailed practice directives that describe the performance expectations for opticians in each area of practice addressed by the National Competencies. These practice directives both inform applicants and provide a basis for effective gap analysis and referrals to additional supports where needed. This provides the basis for OOM's well developed PLAR process that allows for recognition of international work experience and demonstration of competencies. OOM was acknowledged by the Manitoba Prior Learning Assessment Network in 2014 for this work and was honoured with the Pursuit of Excellence in the Assessment and Recognition of Prior Learning (PEARL) award. Their PLAR process allows OOM to consider internationally educated applicants with education and experience in eye care and does not limit them to assessing those trained in opticianry only.

As a follow-up to the 2016 Registration Review, Opticians of Manitoba will continue to build on their current best practice in their action plan including the development of resources for preceptors and participants in supervised practice. Existing resources will further progress with the launch of a free online pre assessment tool and continued development of current and effective online pre arrival information including a resource on profession specific terminology used in the workplace.

Opticians of Manitoba continues to demonstrate progressive fair registration and licensing practices to strengthen diversity in the profession through timely and effective assessment and recognition of internationally educated applicants.

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¹ In order to become licensed to practice as an Optician in Manitoba, applicants must complete both a registration and licensing process.

Introduction

Registration reviews are conducted as part of the Fairness Commissioner's mandate to review the registration practices of regulatory bodies subject to *The Fair Registration Practices in Regulated Professions Act* (Act).

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that registration reviews are to be undertaken at times specified by the Fairness Commissioner. It also stipulates that the content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

The 2016 Registration Review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

In this report, OOM's assessment and registration practice is evaluated in terms of its overall state of fair practice and for the purpose of identifying progress opportunities. This includes an analysis of OOM's activities to improve practice to date and practices regarding the three critical areas.

This report is a public document and will be posted on the OMFC's website, submitted to the Minister of Education and Training and the Minister of Health, Seniors and Active Living.

Context of the Profession in Manitoba

Opticians are trained to design, fit, and dispense eyeglasses, contact lenses, low vision aids, and prosthetic ocular devices. This involves assisting clients, customizing lenses and frames, fitting contacts and instructing on contact lens care.

Most opticians work in urban centres in Manitoba. Some are employed by optometrists, some work for companies and still others are self-employed. Opticianry practice is tied to optometry and ophthalmology in that these professions provide opticians the prescriptions needed to provide service.

Manitoba's increasing pool of internationally educated applicants brings a valuable cultural diversity to the profession; one which supports and better reflects the increasingly diverse Manitobans they serve. Between 2011-2015 internationally educated applicants to OOM were either trained as optometrists or had other experience and training in eye care. Eighteen opticians and optometrists landed in Manitoba between 2011-2015. Of the six internationally educated applicants that applied to OOM between 2011-2015, three were fully licensed.

OOM was a recipient of the 2014 Pursuit of Excellence in the Assessment and Recognition of prior Learning (PEARL) Award given by the Manitoba Prior Learning Assessment Network for its efforts to design and implement a fair, fast and efficient system to recognise prior learning of applicants. Hundreds of volunteer and staff hours were devoted to this work which continues to be a best practice model.

Overview of Assessment and Registration Process

OOM currently operates under the authority of *The Opticians Act* (C.C.S.M. c. 60). In order to practice and use the title of Licensed Optician in Manitoba or Contact Lens Licensed Optician, individuals must be registered and licensed with the Opticians of Manitoba (OOM). Contact Lens Licensed Optician is an extended practice license that allows individuals to dispense and fit not only eye glasses, but contact lenses as well. Registration requires a one-time application for lifetime registration with OOM where as licensure requires annual renewal including fee payment and meeting the other requirements for licensing.

Qualifications

Principal qualifications required for registration and licensing as an optician include possessing an approved two-year diploma in eye-glasses opticianry, one-year diploma in contact-lens opticianry (optional) and successfully passing the National Association of Canadian Optician Regulators (NACOR) National Optical Sciences Examinations (National Exams). There are two, 4-5 hour, multi-format OSCE style practical National Exams: one tests for eyeglass dispensing knowledge and skills, the other for contact lens dispensing.

Internationally educated applicants (IEAs) must successfully undergo OOM's Prior Learning and Recognition Assessment that involves an online Competency Gap Analysis and an interview. Applicants seeking contact lens licensure in addition to the eye glasses designation must possess academic training in contact lens practice and undergo a second Competency Gap Analysis. A single interview follows each of the Gap Analyses.

Depending on their qualifications, work experience and the results of their online assessment and interview, applicants may be required to write one or both of the National Exams, have one or both of the exams waived, and/or be required to complete online coursework and/or undergo supervised practice. Although rare, other opticianry or other eyecare diplomas are not necessarily required if the IEO has received significant technical training on the job.

Application and Assessment Process

For IEAs, the steps in the application and assessment process are:

Step 1: Apply to Opticians of Manitoba

The application to OOM must include the following documents:

- Complete PLAR Application, including \$340 document assessment and interview fee.
- Certificate of completion or a notarised copy of education degree or diploma (if available).

- Details of curriculum, including course outlines, descriptions and syllabi (originals are not required) (if available).
- Dispensing and Fittings Form (one per place of employment) (if obtainable).
- Resumé of work history.
- Letters of reference from current and past employers (if obtainable).
- If previously licensed or registered with a regulatory body, a letter of good standing.
- If applicable, information on previous applications to other Canadian regulatory bodies.
- If applicable, examination marks for any previous regulatory opticianry exams.

Step 2: PLAR Assessment and Interview

Following receipt of a completed application, OOM informs IEO applicants within 6 to 8 weeks whether they are eligible to proceed with a PLAR assessment. Applicants whose education and experience do not meet Manitoba standards are advised of additional training options.

OOM's PLAR assessment has two components: an online, Competency Gap Analysis (CGA) – one for eyeglasses, one for contact lenses – and an interview. Each Gap Analysis test costs \$650 and takes 4-6 hours. Applicants are also advised of the recommended English language level 7 benchmark so that the likelihood of their being able to successfully complete the PLAR process is increased. This is not a pre-requisite however.

Within 30 days of the Gap Analysis, OOM schedules an interview. This is a behaviour based interview with pre-set questions dealing with practice scenarios and structured marking. The purpose of the interview is to give the applicant the opportunity to further demonstrate their expertise in all areas of competency, by outlining how they would handle various scenarios. Examples can be drawn from their own experience working in this field of health care. The results from both the CGA and the behaviour based interview are combined in a scorecard. The combined score is interpreted as per pre-set instructions and if it falls below an acceptable level the applicant is informed of their area of weakness and will be required to successfully complete bridging courses in that specific competency before they are eligible to sit the National Exam. They may also be required to complete supervised practice in that area of competency before they can sit the exam.

Step 3: Assessment Results

Within 6 to 8 weeks following the interview, applicants are informed of the results in writing. OOM's registration committee considers the applicant's complete application, education, work experience and PLAR assessment results to determine if the individual:

- Can proceed directly to registration and licensure: In this instance, the
 applicant must then submit proof of \$1 million in Errors and Omissions
 Professional liability insurance, a criminal records search certificate,
 passport photos, completed PHIA module along with an application
 form and fees, (\$200 registration fee plus the licensing fees of \$646 for
 eyeglasses only (2017) and/or \$693 for contact lenses (2017). The
 contact lens license fee is for an eye glasses and contact lens license
 combined. Being a Contact Lens Licensed Optician means that an
 optician is licensed in eyeglasses as well.
- Must take one or both National Exams before registration and licensure:
 In this instance, the applicant must complete OSCE style exams pertaining to eyeglasses, and optionally, for contact lenses; each exam costs \$725 (\$1,450 for both). Exams are available in Winnipeg annually in June and in other provinces at different times of the year. Successful applicants can then proceed to registration and licensing as above.
- Requires further training before being allowed to take NACOR National Exams: OOM will direct the candidate to take specified bridging courses offered by the Northern Alberta Institute of Technology (NAIT). These courses can be taken on campus or online. Upon successful completion of coursework, applicants then proceed to the National Exams.
- Did not demonstrate enough knowledge and skill to be eligible for the NAIT bridging courses: In this case, to pursue licensure, applicants must complete an opticianry program ideally at an accredited institution.

Appeal Process

OOM has a pre-appeal and appeal process in place for the review of any assessment and registration decision. The Appeal Committee is independent of OOM's original assessment decision makers. Appeal information is presented in the PLAR application information. Applicants must make an appeal in writing within 30 days of receiving the pre-appeal review decision letter. Appeal hearings are held within 4 to 6 weeks. There is no fee for the review (pre-appeal) process.

Time and Cost

Time and costs for IEAs to complete the registration and licensing process will vary according to the circumstances of the individual. For those who are qualified to go directly to registration and licensing following a PLAR assessment, the process can take 4 to 7 months and cost \$2,600 to \$4,100. This estimate does not include the time it may take if required to apply for and write the annual, fixed date National Exams. The applicant can write the exam in Winnipeg (generally held in early June) or can opt to take the exam at a different time elsewhere in Canada. For example, in 2017 there are 11 venues and dates starting in early February and running until late October. 6 to 14 months is a more realistic, minimal time range for those that must arrange to write the National Exams.

Those applicants that require bridge training coursework will face a significantly longer and costlier process. Each online bridging course takes approximately 50 hours but supervised practice may take up to 250 hours to complete.

Specific Costs (2017):

PLAR Application Fee and interview	\$340
Eyeglass Gap Analysis	\$695
Contact Lens Gap Analysis	\$695 (optional)
NACOR Exam – Eyeglasses	\$725
NACOR Exam – Contact Lens	\$725 (optional)
Registration	\$200
License Fee Licensed Optician (2017)	\$646 - Eye glasses
License Fee Contact Lens Licensed Optician * (20	17) \$693

^{*}In order to obtain a Contact Lens License the applicant must also have been licensed as a Licensed Optician but they are not required to pay both licenses, only the Contact lens license. This license includes both eyeglasses and contact lenses.

State of Progress

The Opticians of Manitoba is committed to the fair assessment and recognition of internationally educated applicants.

Many aspects of OOM's registration and licensing process for internationally educated applicants are progressive and OOM has taken steps to improving its practice since the 2012 Registration Review including:

- a new website with landing page for internationally educated applicants that is clear and easy to read and navigate. Their website includes a FAQ page, a page outlining numerous helpful resources as well as estimates of time and costs associated with each step of the registration and licensing process.
- the definition of an Optician was revised and expanded to provide greater clarity for applicants and to help them understand differences between the role of an Optometrist and an Optician.
- a detailed audio visual presentation outlining OOM's registration and licensing process.
- up-to-date *Steps to Registration and Licensing* document and *Document Checklist* resource summarising the registration and licensing process and supporting required document collection and submission.
- elimination of the requirement for an academic credentials assessment by an external assessment service reducing both time and costs for applicants.
- detailed, timely feedback provided in plain language to applicants on gaps identified through the PLAR process.
- a new policy to support the provision of better written reasons.
- an OOM lead initiative to allow for remote location interviews which was subsequently adopted at a pan Canadian level.
- adopting the National Competencies for Opticians and, in Manitoba, the
 development of practice directives which describe in detail the
 performance expectations for opticians in each area of practice
 addressed by the National Competencies document. The performance
 expectations give applicants a strong understanding of the knowledge
 level and performance expectations of Opticians in Manitoba before
 they complete the PLAR requirement.
- national level work to update criteria to support the validity and reliability of the gap analysis and interviewers' results to support better, more consistent recommendations for bridging programs.

- national level work on the development of a free, online, anonymous, pre-assessment tool based on the National Competencies for Opticians which does not require invigilation. Candidates can use the tool to assess their qualifications, skills and knowledge before coming to Canada and entering the PLAR process.
- applicants are informed of their rights to access their records and to appeal any step of the registration process. A pre-appeal process is in place and appeals are not restricted to matters of procedure.

Fair Practice Analysis

The Fairness Commissioner has identified the need for timely and effective registration, the recognition of qualifications acquired through professional work experience and the need for supervised practice opportunities as key substantive issues critical to realize progress among Manitoba regulators.

Following the Manitoba Fairness Standard, the Fairness Commissioner has the following commendations, comments and concerns about OOM's state of progress concerning these key fairness issues:

Timely Registration

The assessment and registration process is structured efficiently (Manitoba Fairness Standard, 7.1).

The assessment and registration process is periodically reviewed to ensure timeliness for internationally educated applicants (Manitoba Fairness Standard, 7.2).

Communication with applicants is timely and systematic (Manitoba Fairness Standard, 7.3).

The registration process is such that qualified internationally educated applicants have an opportunity to practice in some capacity within a year of application (Manitoba Fairness Standard, 7.4).

Applicants who are qualified to go directly to registration and licensing following a PLAR assessment can expect to complete the process in as little as 4 to 7 months. For applicants who must write the annual, fixed date National Exams, 6 to 14 months is a realistic, minimal time range to registration and licensing.

OOM is clearly compliant with the timely registration standard that calls for an efficiently structured registration and licensing process allowing qualified internationally educated applicants to have an opportunity to practice in some capacity within a year of application. The OMFC commends OOM for its work in this regard.

Recognition of Professional Work Experience

Professional work experience is considered to determine qualification (Manitoba Fairness Standard, 5.10).

Regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience (Manitoba Fairness Standard, 5.11).

If Canadian work experience is a mandatory requirement, it is clearly justified (Manitoba Fairness Standard, 5.12).

Through their PLAR process OOM recognizes the professional competencies acquired through work experience internationally educated professionals bring with them. A formal opticianry diploma is not required if an applicant can demonstrate sufficient related education or on-the-job training and experience. IEAs to OOM are often educated as optometrists or they have other training and experience in eye care. OOM's PLAR process provides opportunity for individuals trained in related areas to enter opticianry as an alternative career. This is a best practice.

Canadian work experience is not required as a condition of registration and licensing. There is also opportunity for international applicants to work prior to completing the process. They can work under the direct supervision of a licensed optician as a student if they have applied and received a student registration designation in Manitoba, even if they do not require supervised practice as a bridging requirement.

Supervised Practice Opportunities

Supervised practice opportunities are available for the purpose of assessment and gap training (Manitoba Fairness Standard, 5.13).

OOM offers supervised practice opportunities when needed as a way of addressing a broad range of qualification gaps. Also a best practice.

The availability of supervised practice opportunities is dependent on the willingness of practicing opticians. There are currently few resources that support preceptors in this field engaged in supervised practice arrangements. IEAs are also on their own to find licensed opticians willing to act as preceptors.

Additional Fairness Concerns

No concerns at this time.

Progress Opportunities

- 1. Drawing on the work done to benchmark the profession, developing a resource(s) to be installed on the OOM website to help IEAs better understand how language is used in the field.
- 2. Adding a pre-arrival page to OOM's website to provide guidance on actions that could help potential applicants prepare for the registration process before coming to Canada.
- 3. Updating OOM's website, continuing to keep web content current and accurate.
- 4. Developing resources to better support preceptors and participants in supervised practice.

Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that the Opticians of Manitoba take action regarding the above progress opportunities.

Opticians of Manitoba Action Plan

In response to the Fairness Commissioner's recommendation, OOM proposed the following Action Plan as of October 2016.

OOM's Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2016 Registration Review to discuss implementation of activities and updates to the Action Plan. Action Plan updates will be posted on the OMFC's website on an annual basis, following these meetings allowing any interested party to see the progress to date.

Pro	ogress Opportunity	Acti	on(s)	Completion Date
1.	Drawing on the work done to benchmark the profession, developing a resource(s) to help IEAs better understand how language is used in the field.	1.1	We have requested that CAOE (Canadian Association of Optician Educators) prepare a list of terms commonly used in opticianry in Canada. We will include the list under the PRE ARRIVAL tab which we will be adding to the portal on our website for internationally educated professionals. The Chair of CAOE has agreed to take our request to their national meeting which is being held in Toronto in early November 2016. We have also asked if we could have the list no later than December 31, 2016. CAOE is comprised of representatives from most of the optical programs of the Canadian Colleges.	Spring 2017
2.	Adding a pre-arrival page to OOM's website to provide guidance on actions that could help potential applicants prepare for the registration process before coming to Canada.	2.1	The work to develop PART (Pre-arrival Assessment Tool), a free, online prearrival self-assessment tool has been completed. Once the work to develop the website, where it will be housed has been completed, it will be available for use by all optician regulatory bodies in Canada. The College of Opticians of British Columbia has received a grant to cover the cost of creating the PART website. Once the website is live with the PART tool installed, the link to the tool will be installed on the OOM website under the PRE ARRIVAL tab.	Spring 2017
		2.2	The PART tool also has 7 videos to help explain the PLAR (Prior Learning	

Pr	ogress Opportunity	Actio	on(s)	Completion Date
			Assessment and Recognition) process to internationally educated candidates pre-arrival. We will however be reviewing the finished videos to determine if they are a fit for Manitoba before we install them in the PRE ARRIVAL section.	
		2.3	We will be adding the following information under the PRE ARRIVAL tab:	
		2.3.1	Where to purchase new or used textbooks that are used in the online opticianry training programs offered through the Northern Alberta Institute of Technology(NAIT) 2.3.2 Where to find postings on the Opticians of Manitoba and the Opticians Association of Canada websites and in newsletters, placed by dispensaries who are willing to offer employment to internationally educated professionals who are required to successfully complete a supervised practicum bridging program before they are eligible to sit the national licensing exam.	
		2.3.3	The contact information for opticians in Manitoba who speak languages other than English and are willing to answer questions from internationally trained applicants, about opticianry in Canada.	
3.	Updating OOM's website, continuing to keep web content current and	3.1.	The immediate work which needs to be done to update and fix any broken links on the OOM website will be completed by November 30, 2016.	November 30, 2016
	accurate.	3.2.	We will also be updating the video that is in the portal for internationally educated professionals on our website to reflect a) our change in address and b) the elimination of the requirement for internationally educated professionals to submit a third party	November 15, 2016

Progress Opportun	ity Actio	on(s)	Completion Date
		credential assessment with their application to do PLAR (Prior Learning Assessment and Recognition).	Spring 2017
	3.3.	On a go forward basis, the Council of the Opticians of Manitoba will be asked to approve a new policy on Communications which will include the website and the requirement that the site be maintained on a regular and ongoing basis. This work will be done either by our trained in-house staff who can do some of the work that may be required, or by contracting out the work that must be done by the designer of the website.	Spring 2017
4. Developing resources to bett support preceptor and participants supervised practi	ors in	We have contacted the College of Pharmacists of Manitoba to obtain a copy of their Supervisors Handbook and will use it and other handbooks which have been developed by other organizations for similar purposes, as resources in the development of a handbook for Opticians who supervise practicums for internationally educated professionals, who require them.	June 2017
	4.2	OOM will write a letter of introduction for IEAs seeking supervised practice opportunities as a way of helping licensed opticians understand the IEO is active in the registration process and that supervised practice is required as a means of addressing identified gaps.	Spring 2017
	4.3	Information to direct IEAs regarding how to find supervised practice opportunities and options for volunteering will be added to OOM's website.	Spring 2017

Statement of Compliance

The Opticians of Manitoba's Action Plan is a very positive response to the Progress Opportunities identified in this report and is fully consistent with the requirements under *The Fair Registration Practices in Regulated Professions Act*. These actions will support success of internationally educated applicants in the registration process and with workplace integration and will strengthen an already well designed and supported registration process. I would like to commend OOM for its effective collaboration at the national level on updating national competencies, developing practice directives and a soon to be launched self-assessment tool.

I appreciate OOM's history of engagement with the OMFC and their genuine interest, demonstrated once again through this review process, in further improving their practices to support internationally educated applicants. The significant accomplishments of such a small organization would not be possible without a dedicated staff, council and volunteers.

I look forward to OOM's continued contributions to the advancement of progressive regulatory practices in Manitoba.

Ximena Munoz

Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

The Opticians of Manitoba reports annually to OMFC on the registration of internationally educated applicants to Manitoba.

OOM received a total of 43 applications from 2011-2015. Among those, 6 or 14% were internationally educated applicants (IEAs). The top source country of education was the Philippines.

With regard to licensure outcomes, 3 IEAs obtained full registrations by the end of 2015.

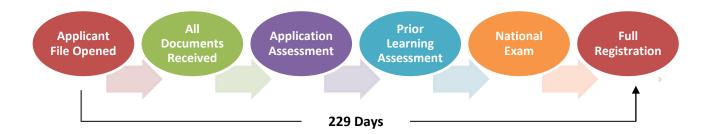
For those IEAs who obtained full registration, the average time to do so upon all application documents received by OOM was 7.5 months. The process is generally accessible between 3-6 months with delays dependent on applicant readiness and capacities to pursue the process in a timely manner.

Past internationally educated applicants to OOM have for the most part been optometrists or they had some other training or experience in eye care.



The time form when an IEA's application documents were received to full registration was on average 229 calendar days or 7.5 months for the successful IEAs.

Average Time to Full Registration



Analysis of 2011-2015 regulator data on internationally educated applicants provided by the Manitoba Bureau of Statistics.

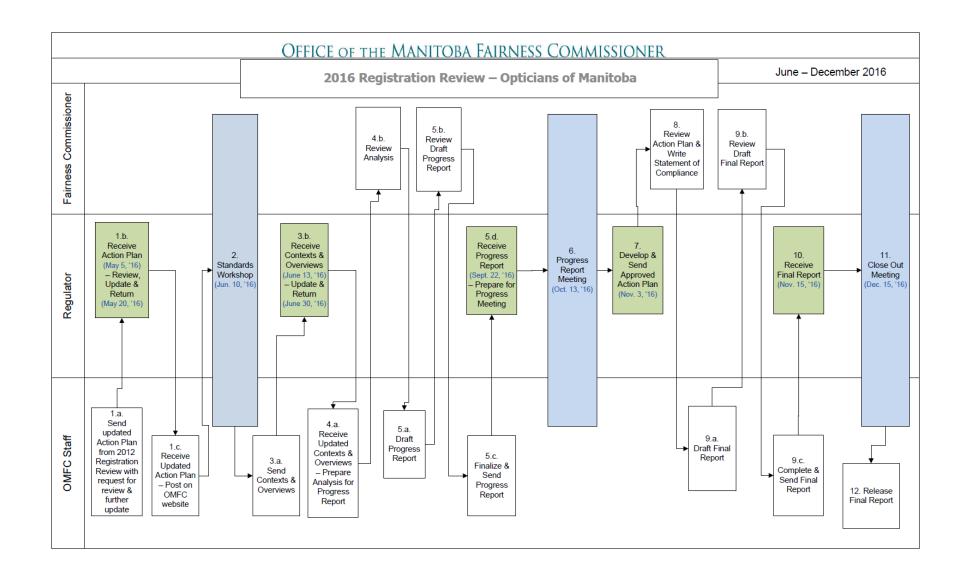
Appendix II: 2016 Registration Review Process

The OMFC's 2016 review process has several key steps: meeting to discuss the agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
Registration Review Workshop	 Group meeting between OMFC and regulators Latest data and research presented Fairness Standard, review focus and process presented Review schedule provided 	June 10, 2016
Progress Report	 OOM report on its fair practice progress Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities Progress opportunities identified Recommendation from Fairness Commissioner to address progress opportunities 	September 22, 2016
Progress Meeting	 OOM representatives, Fairness Commissioner and staff discuss report and possible actions OOM is considering addressing progress opportunities 	October 13, 2016
OOM Action Plan	OOM's Action Plan submitted to OMFC	November 3, 2016
2016 Registration Review Report	 Report submitted to OOM Report contains the review findings, OOM's Action Plan, and the Fairness Commissioner's Compliance Statement 	November 15, 2016
Registration Review Closeout Meeting	OOM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions & how OOM's action plan will inform the relationship moving forward	December 15, 2016
Report Release	 Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Seniors and Active Living and uploaded on the OMFC website 	December 2016

Review participants:

Carol Ellerbeck, Registrar Heather Power, President Sheila Barker, Administrative Assistant



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