

**RESPONSE TO**  
**THE COLLEGE OF OCCUPATIONAL THERAPISTS OF ONTARIO (COTO)’s**  
**CONSULTATION REGARDING PROPOSED EMERGENCY CLASS OF REGISTRATION**  
**April 2023**

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The Ontario Society of Occupational Therapists (OSOT) is pleased to provide feedback on the proposed Emergency Class of Registration as it pertains to the Ontario Governments’ passage of the *Pandemic and Emergency Preparedness Act, 2022*.

**General Comments**

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We support the addition of the Emergency Class of Registration as it provides additional support to the healthcare system in times of need. We expect there will be very few occasions where the COTO Board of Directors would declare a state of emergency.

**Article 38.1(2).3**

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This article states that the [emergency class] member shall practice under the supervision of a general class member. While we agree that some form of supervision is important, this may also present a challenge for consideration. In an emergency, such as the current pandemic, the requirement of being supervised by an OT may limit how efficiently emergency class OTs can be registered. By broadening the supervision requirement to any regulated health professional, the quantity of temporary memberships can be expanded to areas of need including those where OTs currently do not already exist or are in limited quantity. It is assumed that during an emergency all health professions may be impacted and the number of supervisors, in general, may be limited. By expanding the supervision allowances, we may create a strong support structure for this temporary class and the health system as a whole.

**Article 38.1(2).4**

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The abbreviation of “Occupational Therapists (Emergency Class)” to “OT (Emerg.)” may cause members of the public, and other service providers, to confuse the occupational therapist as practicing in the Emergency Department. This may be misleading and misrepresentative of the OT’s circumstance. It is recommended that the word “Class” be added to the abbreviation so it reads: “OT (Emerg. Class)” or not allow an abbreviation for the bracketed part of the title.

### **Article 38.1(3)**

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This article outlines when an emergency certification expires. The first two points (1 and 2) say nearly the same thing and can be merged to read: “Unless stated otherwise on the certificate or renewed certificate, six months after it is issued, unless renewed.”

### **Article 38.1(4)c**

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This article outlines how a member with an emergency class may move to a general practising certificate of registration if certain criteria are met. Part c is vague in terms of what is “satisfactory evidence.” Although it is appreciated that the vagueness of this regulation allows for flexibility to accept a wide range of evidence, it is unclear if there is a minimum requirement or how competent and/or ethical practice will be measured. It is recommended that some criteria be added, for example: “The evidence will be considered by the Registration Committee through use of a standardized methodology.”

### **Article 38.1(5)b**

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There is a period missing at the end of this article.

Thank you for seeking feedback on this proposed regulation change. OSOT has ensured liability insurance products are available to members of the emergency class of registration and will offer a six-month liability insurance purchase option should the Board declare an Emergency. We are committed to working with COTO if, and when, an emergency is declared to offer support to those seeking registration.

Please contact me should you require any clarification, or wish to explore comments further.

Sincerely,



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