



Ontario College of
Social Workers and
Social Service Workers

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REVIEW OF THE
REGISTRATION PRACTICES
OF THE
ONTARIO COLLEGE OF SOCIAL
WORKERS AND SOCIAL
SERVICE WORKERS

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EXECUTIVE SUMMARY

The Ontario College of Social Workers and Social Service Workers (the “**College**”) was established under the *Social Work and Social Service Work Act, 1998* (the “**SWSSWA**”).

The mission of the College is to protect the public interest by regulating the practice of social work and social service work and to promote excellence in practice.

As set out in the letter, dated June 14, 2010, from the Fairness Commissioner respecting the Entry-to-Practice review, the College undertook a review of the following three items:

- (a) Analysis of the reasonableness of the fees charged by the College in respect of registrations;
- (b) Analysis of the efficiency and timeliness of decision-making, including decisions related to assessment, registration and appeals;
- (c) Analysis of the necessity and relevance of the requirements for practical training and or work experience, including any practicum, mentorship, internship or residency.

The methodology was a self study of the College’s current practices with respect to registration; the College’s rationale regarding the 2010 amendments to the College’s registration regulation which became effective August 13, 2010; and, the recommendations made by the independent auditors in the Audit Report of the College’s registration practices, dated March 2010.

Summary and Recommendations

Overall, in the view of the College, the current entry-to-practice requirements for registration with the College are relevant and necessary to fulfill the College’ mandate of public protection and to execute the objects as set out in the SWSSWA.

In the course of the Entry-to-Practice review, a number of processes and practices related to the timeliness of decisions for some applicants were identified to which the College will pay particular attention. The College has begun to develop implementation plans that will improve the support and responsiveness to applicants.

Reasonableness of Fees

At this time, the College is of the view that the fees associated with registration are reasonable. Since 2007 there has been a 27% reduction in the registration fee and the annual fee. Additionally, the College has implemented a reduced fee for graduates of social work and social service work programs and graduates of the Internationally Educated Social Work Professional Program at Ryerson University. The registration fee continues to be prorated quarterly and a refund issued, if applicable.

Council of the College will continue to review the current fees annually through its work plan and budget approval process.

Timely Decisions, Responses and Reasons

The College renders timely decisions respecting the assessment of the registration requirements for the majority of applicants. Specifically, the College provides timely decisions to applicants who: hold a degree in social work, or a diploma in social service work, or submit a letter of evaluation respecting their international social work credential from the Canadian Association of Social Workers, or hold an authorizing certificate of registration from a social work regulatory authority in Canada.

The College has implemented the recommendations from the independent auditor's report submitted to the Office of the Fairness Commissioner in March 2010. The College has developed a process to monitor the status of all applications. Further to this recommendation, the College implemented a continuous communication schedule for applicants whose application documentation remains outstanding.

The College provides thorough reasons to applicants if the Registrar proposes to refuse to issue a certificate of registration to an applicant. If an applicant requests that the Registration Appeals Committee review the Registrar's proposal, the Registration Appeals Committee is able to respond to applicants in the time period that is set out in the SWSSWA. Their decisions are thorough and provide detailed reasons for the decision.

The College has identified an issue with respect to timeliness for applicants who are applying for registration based on a combination of academic qualifications and experience performing the role of a social worker or social service worker, as the case may be, that the Registrar determines is substantially equivalent to the qualifications required for a degree in social work from a social work program accredited by the Canadian Association for Social Work Education or a diploma in social service work from a social service work program offered in Ontario at a College of Applied Arts and Technology. The complexity of the assessment processes for these applications is detailed and time consuming. Accordingly, the College has not realized a reasonable time frame within which to complete the evaluation process. While the delays are no different for applicants who were educated in Canada, the USA or other countries, the length of time and the complexity of each review continues to be protracted.

The College has made changes to the registration practices to improve the processing of applications. These include: redesign of the College website and the application forms and supporting documents to provide more transparency with regard to the requirements; and in the past two years, reorganized the registration department to assign staff specifically dedicated to the review of these complex applications. However the College recognizes that more work needs to be done to streamline the review in order to process these applications in a timely way.

The Registration Regulation made under the SWSSWA was recently amended and the amendments to the registration regulation came into force on August 13, 2010. The amending regulation introduced a new requirement for registration with respect to the demonstration of competence to practice the professions. An applicant must have engaged in the practice of social work or social service work, or obtained a degree in social work or a diploma in social service work, as the case may be, within the five years immediately before the date of the application or otherwise satisfy the Registrar that he or she is competent to perform the role of a social worker or social service worker, as the case may be. This amendment required the implementation of new registration assessment processes. It is noted that the new requirement has increased the length of time it takes to assess some applications. The College will monitor the length of time it now takes to assess the applications for those applicants who have neither engaged in the practice of one of the professions nor obtained their degree or diploma, as the case may be, within the five years immediately before the date of the application.

Requirement - Practical Experience

The following are the “entry-to-practice practical requirements” for applicants:

- 1) As noted above, it is now a requirement for registration with the College that an applicant must have engaged in the practice of social work or social service work, or obtained a degree in social work or diploma in social service work, as the case may be, within the five years immediately before the date of the application or otherwise satisfy the Registrar that he or she is competent to perform the role of a social worker or social service worker, as the case may be.
- 2) Applicants wishing to be assessed on the basis of their combination of academic qualifications and experience performing the role of a social worker or social service worker, as the case may be, must fulfill certain practice requirements.

The College is of the view that the Registration Regulation and associated Registration Policies approved by Council are intended to maintain the standards that one would expect of a graduate of a social work program accredited by the Canadian Association for Social Work Education, or a graduate of a social service worker program offered in Ontario at a College of Applied Arts and Technology.

INTRODUCTION

The Ontario College of Social Workers and Social Service Workers (the “**College**”) was established under the *Social Work and Social Service Work Act*, 1998 (the “**SWSSWA**”).The transitional Council was appointed in June 1999. The SWSSWA was proclaimed on August 15, 2000. The first Registrar was appointed in February 2000, and the first elected and appointed Council took office in November 2000.

The mission of the College is to protect the public interest by regulating the practice of social work and social service work and to promote excellence in practice.

The College is governed by a 21 member Council (“**Council**”), comprised of 7 elected social work members, 7 elected social service work members and 7 public members appointed by the Lieutenant Governor in Council. The staff complement, under the direction of the Registrar and CEO, fulfills the objects as set out in the SWSSWA.

Since February 2000, the College has issued more than 17,000 certificates of registration for social work and social service work. The College also renews, suspends, cancels, revokes and reinstates certificates of registration.

Requirements for registration are set out in the SWSSWA; the Registration Regulation (Ontario Regulation 383/00); College by-laws; and registration policies approved by Council. The Registration Regulation was amended on August 13, 2010 and established a new requirement related to competence and provided for an inactive category of membership. Other amendments were required in order to comply with the *Ontario Labour Mobility Act* (the “**OLMA**”).

OBJECTIVES AND SCOPE OF THE REVIEW

Section 19 (1) of the *Fair Access to Regulated Professions Act*, 1996 stipulates that every regulated profession shall undertake a review of its registration practices at times specified by the Fairness Commissioner to ensure that the practices are transparent, objective, impartial and fair. As per section 19(2) the review shall include an analysis of the extent to which the requirements for registration are necessary for or relevant to the practice of the profession(s); the efficiency and timeliness of decision-making; and, the reasonableness of the fees charges by the regulated profession in respect of registrations.

As set out in the letter, dated June 14, 2010, from the Fairness Commissioner respecting the Entry-to-Practice review, the College undertook a review of the following three items:

- (a) Analysis of the reasonableness of the fees charged by the College in respect of registrations;

- (b) Analysis of the efficiency and timeliness of decision-making, including decisions related to assessment, registration and appeals;
- (c) Analysis of the necessity and relevance of the requirements for practical training and or work experience, including any practicum, mentorship, internship or residency.

The College regulates the practice of two professions, social work and social service work. This review will make it clear when there is no distinction in the registration practices for the two professions. Similarly, this review will identify where there are differences in the registration practices for the two professions.

METHODOLOGY OF THE REVIEW

The methodology was a self study of the College's current practices with respect to registration; the College's rationale regarding the 2010 amendments to the College's registration regulation which became effective August 13, 2010; and, the recommendations made by the independent auditors in the Audit Report of the College's registration practices, dated March 2010.

This review focused the College on three specific areas, and afforded the opportunity to review the registration practices to evaluate whether these practices were fair, transparent, objective and impartial.

REASONABLENESS OF FEES

BACKGROUND

The annual fee for applicants and members of the College was initially established by the transitional Council after a thorough review of estimated revenues and expenses and the subsequent development of a detailed business plan. This plan was based on the experience of regulatory Colleges of similar size membership. A comparison of fees of these regulatory bodies was also undertaken. As with all self-regulatory professions in Ontario, the cost of regulation of their profession must be borne by the members through registration fees and annual member fees. Based on regular reviews of other Ontario regulated professions and other Canadian social work regulatory authorities, the registration and annual fees for the College is consistent with that of other professions and is less than many.

The initial non refundable application and registration fee were set at \$75.00 and \$370.00 respectively. The registration fee is prorated on a quarterly basis, and a refund issued, if applicable, at the time a certificate of registration is issued.

In response to feedback received from members regarding the annual fee, and in noting that the financial position of the College in the first five years of operation exceeded expectations, the Council first considered the matter of a reduction in the membership fee in 2004. However, in reviewing the developmental stage of the College at the time and the unrealized expenses projected by the transitional Council, the Council decided to review the matter of the fees at the conclusion of the business plan established by the transitional Council in late 2005.

On May 10, 2006, Council approved the reduction of the annual fee and registration fee from \$370.00 to \$340.00 effective January 1, 2007. There was no change to the non refundable application fee.

At the same time, Council considered that new graduates may face financial hardships upon graduation. As such, Council approved a \$100.00 reduction of the registration fee for graduates of social work and social service work programs who apply for registration in the College no later than December 31 of the year in which they graduate. The registration fee for new graduates was set at \$240.00 and remains in effect for the two subsequent years of membership provided that the annual fee payment was made prior to the date on which the late penalty came into effect. The registration fee continued to be pro-rated quarterly, and a refund issued, if applicable, at the time the certificate of registration was issued.

In May 2007, a further amendment to the fee by-law was made to include graduates who obtained a Certificate in Canadian Social Work Practice from the Internationally Educated Social Work Professionals Bridging Program at Ryerson University (the "IESW Bridging Program") as exempt from payment of \$100.00 of the registration fee and, as with graduates of social work and social service work programs, graduates of the IESW Bridging Program were exempt from \$100.00 of the annual fee for the two subsequent years, provided they paid the annual fee before the late penalty became effective.

In May 2008, Council of the College approved a further 20% reduction of the annual fee and registration fee, effective January 1, 2009 to the current amount of \$270.00. The registration fee and annual fee for new graduates of social work programs, social service work programs and graduates of the IESW Bridging Program is \$170.00. The registration fee continues to be prorated quarterly. There has been no change to the non refundable application fee set at \$75.00.

CURRENT PRACTICE

The College's operating funds are borne solely by the members. There is no difference between the fees for an application in the social work category or the social service work category. There is no difference between the fees for applicants who obtained their academic credentials in Canada or internationally.

The following fee schedule has been set for persons applying for registration in the College.

Application Fee: The non refundable application fee is the same for all applicants in each category, set at \$75.00. Two non refundable application fees are required when a person applies in both the social work and the social service work categories.

Registration Fee:

- The registration fee is currently set at \$270.00.
- New graduates of social work, and social service work programs, and graduates of the IESW Bridging Program are eligible for a reduced fee. This is currently set at \$170.00.
- The registration fee is prorated quarterly, and a refund is issued, if applicable, at the time a certificate of registration is issued.
- There is only one registration fee for members who are registered in both the social work and social service work categories.
- The registration fee is returned in full to an applicant if:
 - he or she withdraws the application; or,
 - if the Registrar Proposes to refuse to issue a certificate of registration; or,
 - if an applicant submits an incorrect application form.

Additional fee: The College charges \$25.00 on any payment that is not honoured (e.g. credit card declined or NSF cheque). This administrative fee covers charges incurred by the College from the financial institution and offsets the added administrative costs associated with office processes.

Access to documents: There is no fee associated with an applicant accessing their records related to their application. A written request to access their records is required.

Registration Appeals Committee: There is no fee associated with an applicant requesting a review by the Registration Appeals Committee of the Registrar’s proposal to refuse to issue a certificate of registration. The cost of the review is absorbed by the College.

Additional costs which are out of the control of the College:

- Fees associated with language testing agencies;
- Fees associated with translation of documents from a language other than French or English to English or French;
- Fees associated with an evaluation of a social work academic credential by the Canadian Association of Social Workers (the “CASW”). The current fee for an “Assessment of Foreign Trained Social Workers’ Degrees” was set at \$282.50 (\$250.00 +13% HST)

effective July 1, 2010. The College maintains contact and communication with the CASW regarding the College's obligation to ensure that the fees of third party assessors are reasonable;

Fees associated with requesting that academic transcripts be forwarded from an academic institution to the College;

Enrollment in the IESW Bridging Program for social workers (Note: This is not a requirement for registration in the College).

ANALYSIS AND RECOMMENDATIONS

It is the view of the College that the current fee structure is reasonable.

On a regular basis, the College reviews the member fees of similarly sized provincial regulators in Ontario, social work regulators across the country and the fees of several social work regulators in the USA. The fees charged to College members are similar to most and less than many.

The College has reduced fees at the rate of 27% since 2000. However, the College remains committed to ensuring that it has the resources required for current and future operations. Council will continue to review the College fee structure annually during the annual budget review process to determine whether the current fees are appropriate to maintain the College's obligations under the SWSSWA.

TIMELY DECISIONS, RESPONSES AND REASONS

BACKGROUND

Decisions of the Registrar regarding an applicant's application for membership in the College are based on the assessment of the requirements and conditions set out in the SWSSWA, the registration regulation, the College by-laws, and registration policies.

CURRENT PRACTICE

There is no distinction in the manner that the College processes applications and communicates decisions, responses and provides reasons to social work applicants and social service work applicants. Similarly, there is no difference in registration practices for applicants educated in Canada and applicants educated internationally.

The College has established office practices for the review and assessment of applications. Applications are considered ready for the Registrar's review once the application form, the fees, supporting documents and responses to questions from the Registrar have been received at the College.

The Audit of Registration Practices Report submitted to the Office of the Fairness Commissioner in March 2010, recommended that the College implement a regular (e.g.

quarterly) internal review process to assess the performance of the registration department and ensure that no application has inadvertently “fallen through the cracks”.

Further to this recommendation, the College introduced a new practice that established a continuous communication schedule with applicants whose application continues to be incomplete. In some cases, communication is sent to applicants approximately every 60 days to a maximum of 240 days (approximately 8 months). After that period of time, if an application remains incomplete either the Registrar may issue a Proposal to refuse or will consider the application to be withdrawn, bearing in mind the individual circumstances of each application. It is the expectation that this new office practice will help applicants provide the necessary documents in a timely way.

The College strives to meet the following timelines for assessment, review and decisions of applications:

4-6 weeks – Applications received from applicants who obtained their academic credentials in social work from: a social work program accredited by the Canadian Association for Social Work Education (the “CASWE”); or a social work program accredited by the Council on Social Work Education in the USA; or had an evaluation completed by the CASW regarding the outcome of the an international social work credential; or are applying for registration based on their current registration in another social work regulatory authority.

-Applications received from applicants who obtained their academic credentials from a social service work program in Ontario offered at a College of Applied Arts and Technology or equivalent program.

The College has noted that there may be a significant gap between the period of time that students complete all academic and practicum requirements and the date by which they officially obtain their degree in social work or diploma in social service work, as the case may be. The College was of the view this created a barrier for some graduating students in their job search. To address this, the College has implemented a Registration practice whereby the Registrar may issue a general certificate of registration provided the applicant consents to a term, condition, or limitation placed on his or her certificate of registration. The certificate will automatically expire within 90 days after the date of convocation, if the College does not receive written verification from the social work or social service work academic institution that the degree or diploma, as the case may be, has been obtained. There are a number of steps that must be completed by the applicant’s academic institution, and the applicant and the College before an application is complete. New members will receive a reminder letter within 30 days of the date the term, condition or limitation is set to expire, informing of the required next steps and implications.

-Applicants who consent to a term, condition or limitation placed on their certificate of registration that coincides with their authorization to work in Canada, as evidenced by the Work Permit issued by the Ministry of Citizenship and Immigration.

-The College makes every effort to accede to requests for expedited reviews of applications once the fees and all required documents have been received. Most requests come from applicants who have secured employment. The College noted a marked increase in requests for expedition during the months that social work and social service work students graduate. For example, from June 1 – July 31, 2010 and November 1 – December 31, 2010 the College received 292 and 174 applications respectively for social work and social service work (based on the applicant obtaining a social work degree, or a social service work diploma). Approximately 12 -15 applications per month were processed within 1-3 business days.

- Names of new members are placed on the public register within one business day. Applicants receive a resource binder at the time of registration. Resource binders are mailed within one week in the first quarter of the year, and between 2-3 weeks in the 2nd, 3rd and 4th quarter of the year due to increased administrative processes associated with the refund of the registration fee.

7-16 weeks – Applicants who have disclosed any findings or proceedings in relation to professional misconduct, incompetence or incapacity, or have disclosed any findings of guilt in relation to a criminal offense, an offense under the *Controlled Drugs and Substances Act* (Canada) or the *Food and Drugs Act* (Canada) or any other offense relevant to the applicant’s suitability to practice social work or social service work, as the case may be.

Longer than 16 weeks – Applications for a general certificate of registration based on a combination of academic qualifications and experience that the Registrar determines is substantially equivalent to a degree in social work or a diploma in social service work, as the case may be. The College receives 50-60 such applications annually both from applicants who obtained academic credentials in Canada and internationally. The College has experienced a significant back log in the assessment and processing of these applications and in communicating the decisions to applicants in a timely way. The high volume of applications and the detailed research and review processes required to assess all components of the application and the supporting documents result in a lengthy and time consuming assessment process. In accordance with the SWSSWA, the registration regulation and the registration policies approved by Council, the Registrar must assess each application to determine whether all requirements for registration have been met. If it is determined that the requirements have not been met, the Registrar must issue a proposal to refuse to issue a certificate of registration. Such proposals are exceptionally detailed so as to be transparent, objective, fair and impartial.

The College implemented several strategies to address the delays. These strategies have included hiring an additional part time staff; and, reorganizing the registration department so that 2 full time staff are dedicated to processing the applications. The College continues to monitor and revise the review process and to make improvements to the timeliness of the Registrar’s decision. However, it is worthy to note that there has been a 68% decrease in the number of requests for review by the Registration Appeals Committee between

2009 and 2010. This decrease is attributed to the increase in transparency and thoroughness of the Registrar's proposals.

The College recognizes that this is an area that requires further attention.

Amendments to the Registration Regulation: On August 13, 2010 amendments to the registration regulation came into force. The amending regulation introduced a new requirement for registration. An applicant must have engaged in the practice of social work or social service work, as the case may be, within the five years immediately before the date of the application or otherwise satisfy the Registrar that he or she is competent to perform the role of a social worker or social service worker, as the case may be. This requirement does not apply to an applicant who has obtained the academic qualifications, or the academic qualifications and experience, required for registration with the College, within the five years immediately before the date of the application. To address the new requirement the College has implemented new assessment practices. The College has noted an increased number of applicants to whom this new requirement applies. These applicants often must provide additional evidence to the College to satisfy the Registrar that he or she is competent to perform the role of a social worker or social service worker, as the case may be. These additional processes may create unavoidable delays in the timeliness of decisions to these applicants. The College will continue to monitor the impact of this new requirement.

Registration Appeals Committee:

If a request for a review of the Registrar's proposal to refuse to issue a certificate of registration is received by the Registration Appeals Committee, the following time lines are in place:

- Acknowledgement letter and file contents forwarded to the applicant within 2-3 weeks of receipt of the request for review;
- The applicant is afforded thirty days to make further written submissions on the file contents;
- If a document(s) is received by a third party on behalf of the applicant, the applicant is afforded an additional thirty days to review the document(s) and make written submissions;
- The Registration Appeals Committee meets monthly and will authorize a panel to consider a review. As of December 31, 2010, the Registration Appeals Committee had 5 applications waiting for review;
- The SWSSWA sets out the timelines by which the Registration Appeals Committee communicates its decision to the Registrar and provides a copy of its decision to the applicant.

Third Party Assessment of Social Work Qualifications: The College currently relies on the CASW to assess the academic credentials of non-North American educated social workers. Information about the evaluation process, the fees, and all the required forms are posted on the CASW website. In May 2010, the CASW underwent an organizational

review. One recommendation from the organizational review is to shift the CASW's assessment of foreign trained social workers to another organization. The College continues to monitor this matter. The recommendation will potentially impact the assessment of non-North American social work credentials by the College.

ANALYSIS AND RECOMMENDATIONS

The College is of the view that the majority of applicants receive a decision from the Registrar in a timely manner. Specifically, applicants who obtained a degree in social work, or obtained a diploma in social service work, or are applying under the provisions of the OLMA, or received an evaluation from the CASW regarding their program's equivalence to a Canadian Bachelor of Social Work. Furthermore, the College has been able to expedite assessment of applications reviews within 1-3 business days upon request, once all documentation and the fees have been received.

The College is confident that the new continuous communication schedule will reduce the length of time that an application is incomplete. The College is confident that the redesigned website will provide transparent information to all applicants.

The College is aware that other provincial regulators have an automated application process which allows applicants to track the progress of their application by logging into a secure website. The College has no immediate plans to implement such a service, but is aware that this function may help applicants track their application in the future.

The College is committed to reducing the length of time it takes before an applicant receives notification of the Registrar's decision on applications based on a combination of academic qualifications and experience substantially equivalent to a degree in social work or a diploma in social service work, as the case may be. At the same time, the College is committed to maintaining the integrity of the decisions.

The College has implemented the following practices in an effort to streamline the evaluation process for applicants applying for registration on the basis of a combination of academics qualifications and practical experience:

- redesigned the social work application form and the registration guide, to improve the transparency of information for applicants;
- redesigned the College website to improve navigation and provide more fulsome information about the registration requirements.

Of note, the College undertook a review of a random sample of other provincial regulatory authorities to see whether they communicate to applicants the length of time that an application would remain active. It was found on the websites of the regulatory authorities sampled, that none specify how frequently an applicant will be communicated to. Some regulatory organizations do specify how long an application will remain active before the application is deemed "terminated" or "closed". The College will consider whether

providing this information to our applicants will be helpful in completing timely decisions.

The Registration Appeals Committee: responds to applicants requesting a review of the Registrar's proposal in the time period that is set out in the SWSSWA. The decisions are thorough and set out detailed reasons for the decisions. The Registration Appeals Committee continues to improve its processes.

Third Party Assessment of Social Work Qualifications: The College currently relies on the CASW to assess the international social work academic credentials. The College will continue to monitor the recommendation of the CASW organizational review regarding evaluation of international social work credentials moving to another organization.

Amendments to the Registration Regulation: The College has recently implemented a new entry-to-practice requirement respecting the assessment of an applicant's competence to perform the role of a social worker or social service worker, as the case may be. This matter will continue to be monitored.

REGISTRATION REQUIREMENT: PRACTICAL EXPERIENCE

BACKGROUND

The SWSSWA and the registration regulation made under the SWSSWA set out the requirements and conditions that must be in place before a certificate of registration can be issued. There are three circumstances under which applicants must demonstrate practical experience.

1. Amendments to the Registration Regulation: Competence to perform the role of a social worker or social service worker, as the case may be:

As indicated above, on August 13, 2010 amendments to the Registration Regulation came into force. The amending regulation introduces a new requirement for registration for social work and social service work, as the case may be.

An applicant must have engaged in the practice of social work or social service work, as the case may be, within the five years immediately before the date of the application or otherwise satisfy the Registrar that he or she is competent to perform the role of a social worker, or social service worker, as the case may be. This requirement does not apply to an applicant who has obtained the academic qualifications, or the academic qualifications and experience, required for registration with the College, within the five years immediately before the date of the application.

2. Experience Performing the Role of a Social Worker:

The registration regulation sets out the requirements for the issuance of a general certificate of registration for social work.

An applicant who is applying for a general certificate of registration based on a combination of academic qualifications and experience performing the role of a social worker must produce documentation satisfactory to the Registrar regarding his or her experience performing the role of a social worker. Additionally, the applicant must produce documentation that confirms he or she was supervised by a social worker. Independent evidence of the applicant's experience performing the role of a social worker is provided to the College on the "Length of Practice and Supervision Confirmation Form". Such applicants must demonstrate that they performed the role of a social worker for a minimum of one year, 700 hours of which is required to have been supervised by a social worker. The applicant is also required to demonstrate that they have engaged in the practice of social work within the five years immediately before the date of the application or otherwise satisfy the Registrar that he or she is competent to perform the role of a social worker.

In establishing the College registration policy regarding the assessment of academic qualifications and practical experience that is substantially equivalent to a social work program offered at a social work program accredited by the Canadian Association for Social Work Education, the Council was assisted by the Accreditation Standards that were set by the CASWE, formerly the Canadian Association of Schools of Social Work. The "Field Education Standards at the First University Level" set out that: "Programmes of social work education at the first professional degree level will include field education as an integral component of the curriculum that is required of all students. The objectives of field education are the development of practice competence and the preparation of a professionally reflective, self-evaluating, knowledgeable and developing social worker". (SB 6.1) Furthermore, the accreditation standards set out that "students shall be required to complete a minimum of 700 practical hours. (SB 6.5). In order to set a standard that was substantially equivalent for those applicants who may not have had the opportunity for a social work field practice experience, the Council recognized that field practice experience in a BSW program has the intensity of supervision which may not be duplicated in a work experience. In addition, the BSW program links the university curriculum directly to the practical experience through ongoing communication between faculty and field placement supervisors. Therefore it was felt that it would take more than 700 hours of practical experience to achieve the equivalent outcome to that of a BSW field education experience.

3. Experience Performing the Role of a Social Service Worker:

The registration regulation sets out the requirements for the issuance of a general certificate of registration for social service work.

An applicant who is applying for a general certificate of registration based on a combination of academic qualifications and experience performing the role of a social service worker must produce documentation satisfactory to the Registrar regarding his or her experience performing the role of a social service worker. Additionally, the applicant must produce documentation that confirms he or she was supervised by a social service worker or a social worker. Evidence of the applicant's experience performing the role of a social service worker is provided to the College on the form "Length of Practice and Supervision Confirmation Form". These applicants must provide evidence that they have performed the role of a social service worker for a minimum of 900 hours, all of which was under the supervision of a social worker or social service worker. The applicant is also required to demonstrate that they have engaged in the practice of social service work within the five years immediately before the date of the application or otherwise satisfy the Registrar that he or she is competent to perform the role of a social service worker.

On May 26, 2003, Council approved a registration policy "Combination of Academic Qualifications and Practical Experience Substantially Equivalent to a Diploma in Social Service Work". The policy was developed to establish criteria to assist the Registrar in making the determination that the applicant's combination of Academic Qualifications and Practical Experience is substantially Equivalent to a Diploma in Social Service Work from a social service work program offered in Ontario at a College of Applied Arts and Technology.

In establishing the requirements for practical experience, Council was assisted by the requirements set by the Ministry of Training, Colleges and Universities for social service work programs at Colleges of Applied Arts and Technology in Ontario as set out in the Social Service Worker Program Standard, April 1996 ("**CSAC Standards**"). The CSAC Standards outline the essential skills and knowledge that are required for a student to graduate from a social service work program. The College also undertook a thorough review of the field practice hours required for a student to graduate from a social service work program. While it was found that each academic institution set its own field practice hours, the College determined that the average number of field practice hours across the social service work programs in Ontario that were surveyed was approximately 600 hours over the course of three academic semesters. The College established the minimum standard at 900 hours of practical experience, which is 33% higher than 600 hours of social service work program field practice experience. The rationale is borne from the view that the applicant would not have had the opportunity to participate in field seminar courses that typically link the theoretical curriculum with the applied learning that occurs in a social service work field practice setting. There was also recognition that a major strength of a social service worker program is the opportunity given to students to experience a broad range of community, educational, mental health, legal or social service settings. The placement provides the student with an opportunity to implement and practice.

Supervision by a social worker or social service worker was established at 900 hours. As applicants for a general certificate of registration for social service work based on a combination of academic qualifications and practical experience did not have the benefit

of the academic courses, nor the benefit of field seminar courses, it was the view of the College that applicants, who for the most part, come from disciplines not in social service work, performed the role of a social service worker under the supervision of an individual who has the knowledge and skills required for the profession.

CURRENT PRACTICE

The College receives approximately 50-60 applications annually for a general certificate of registration based on a combination of academic qualifications and practical experience in social work, or social service work, as the case may be. There are no restrictions regarding where an applicant must have completed the practical experience requirement.

The review of applications for a general certificate of registration from social work applicants and from social service work applicants based on substantial equivalence requires extensive review and assessment of both the academic qualifications and the practical experience of the applicants. Applicants are required to forward a “Length of Practice and Supervision Confirmation Form” for social work or social service work, as the case may be, to their employer or supervisor. These forms must be completed by the employer or supervisor and forwarded directly to the College.

ANALYSIS AND RECOMMENDATIONS

The questions that are considered below address the rationale for the practice requirements and assess whether the requirements are necessary for or relevant to practice of the professions.

- 1. Competence to perform the role of a social worker or social service worker, as the case may be:**

All applicants, whether they are educated in Canada or internationally, are required to meet the new requirement as set out in the amended registration regulation. All applicants must have engaged in the practice of social work or social service work, as the case may be, or obtained the academic qualifications in either profession within the five years immediately preceding the date of the application or otherwise satisfy the Registrar that the applicant is competent to perform the role of a social worker or social service worker, as the case may be.

In reviewing the addition of this registration requirement, the College confirmed, and Cabinet agreed, that demonstration of competence to practice a profession is a common entry to practice requirement for regulated professions whose primary duty is to protect the public interest. Demonstration of competence ensures that applicants have the required knowledge, skills and abilities to practice the profession(s) ethically and safely.

The College found that other regulatory authorities consider this requirement in a variety of ways. Some regulatory authorities require that applicants engage in the practice or clinical training within a period of time preceding the date of the application or to have successfully completed an educational program within a period of time preceding the date of the application. Some regulatory authorities require the successful completion of an entry to practice examination within a period of time preceding the date of the application. It was found that other Canadian social work regulatory authorities assess an applicant's experience in the practice of the social work profession as a registration requirement.

In the view of the College, the requirement to demonstrate competence to practice does not create a barrier to registration. It affords the College the opportunity to ensure that a new member, for whom there has been a lengthy period of time since he or she was trained or since they have practiced the profession is able to satisfy the Registrar as to their competence to practice. The College is aware that it is permissible under the OLMA to require an applicant to undertake, obtain or undergo material additional training, experience, examinations or assessments if the individual has not practiced the regulated profession within a fixed period of time.

The College considered the length of time since professional training or active practice, which is established at five years preceding the date of the application. The College is of the opinion that this length of time is reasonable and not too onerous. The primary rationale for this requirement is related to the need for a professional to demonstrate that they are up to date with developments and best practices in the field. This rationale correlates with Principle II of the College's Standards of Practice which relates to competence: Interpretation 2.1.2. of the Standards of Practice states: "College members remain current with emerging social work or social service work knowledge and practice relevant to their areas of professional practice". Furthermore, Interpretation 2.1.3. states "College members maintain current knowledge of policies, legislation, programs and issues related to the community, its institutions and services in their areas of practice."

With respect to social work, the first professional degree, the Bachelor of Social Work, is a four year degree. If an applicant has not practised the profession or been trained in the profession for a time that is slightly longer than the time required for a degree in social work, it is in the public interest for the College to ensure that the applicant has the requisite knowledge, skills and abilities to practise the profession safely and ethically. The College also considered data that was gathered by the Complaints Committee of the College. It was noted that the length of time since professional training and or current practice can lead to errors in judgment, out- of -date skill sets and lack of familiarity with current legislative requirements related to the practice of social work and social service work, as the case may be. The College's experience demonstrates that a significant period of time since a person completed their professional training or practised the profession may negatively impact a person's competence to apply and integrate current knowledge in the practice of the profession.

In developing the amended regulation, the College requested comments on the proposed regulation from a number of stakeholders. The proposed regulation and a synopsis describing the proposed changes were circulated or posted to the following: Ministry of Community and Social Services (MCSS) for posting on the Regulatory Registry of the Ontario government; Minister of Community and Social Services and the Minister of Training, Colleges and Universities, as required by the OLMA; the Office of the Fairness Commissioner; all Canadian social work regulatory authorities as required by the OLMA; and members of the College and other stakeholders through posting on the College website.

The College now has 7 months of experience in applying the new requirement as set out in the amended registration regulation. Each application is evaluated on its unique merits. The College is now beginning to build a bank of precedents and is beginning to develop consistent criteria that will help in the assessment of future applications. The College continues to be cognizant that it will take time to develop the criteria for applying the new requirement.

2. Experience Performing the Role of a Social Worker:

The College is of the view that the policy approved by Council provides the Registrar with the guidelines required under the SWSSWA and the registration regulation made under it.

The SWSSWA and the registration regulation require that the College consider applicants for registration in the College who have a combination of academic qualifications and experience that is substantially equivalent to the qualifications required for a degree in social work from a social work program accredited by the CASWE.

In developing the policy that supports the registration regulation, Council relied on the accreditation standards set by the CASWE to determine what is substantially equivalent to the qualifications required for a degree in social work from a social work program accredited by the CASWE. In the view of the College, the words “substantially equivalent” mean equal in value in essential and material requirements. Therefore, in order for an applicant to demonstrate that he or she satisfies the requirements set out in the registration regulation, they must demonstrate that their academic qualifications and experience are equal to the essential and material requirements of the qualifications required for a degree in social work from a social work program accredited by the Canadian Association for Social Work Education. Although the policy was established as a guide for the Registrar, in the view of the College, a significant variance from the criteria would raise questions about the “substantial equivalence” of any application. The policy was not intended to lower the standards of professional competence, and the foundation of those standards is a university level academic program in social work.

The College has recently revised the College website to improve navigation and access to the information associated with registration. In an effort to be transparent and fair to applicants regarding the policy requirements, in the redesign of the social work application for a general certificate of registration based on a combination of academic

qualifications and experience, the College revised the format so that there was clear information available to the applicant, improved the detail of the questions so that applicants can provide more fulsome answers.

3. Experience Performing the Role of a Social Service Worker:

The College is of the view that the policy approved by Council provides the Registrar with the guidelines required under the SWSSWA and the registration regulation made under it.

The SWSSWA and the registration regulation require that the College consider applicants for registration in the College who have a combination of academic qualifications and experience that is substantially equivalent to the qualifications required for a diploma in social service work from a College of Applied Arts and Technology in Ontario.

In developing the policy that supports the registration regulation, Council relied on the CSAC Standards, Ministry of Training, Colleges and Universities to determine what is substantially equivalent to the qualifications required for a diploma in social service work offered at a College of Applied Arts and Technology in Ontario. In order for an applicant to demonstrate that he or she satisfies the requirements set out in the registration regulation, they must demonstrate that their academic qualifications and experience are equal to the essential and material requirements of the qualifications required for a diploma in social service work from a social service work program at a College of Applied Arts and Technology in Ontario. The Council measured its policy beside the standards set by the Ministry of Training, Colleges, and Universities. Although the policy was established as a guide for the Registrar, in the view of the College, a significant variance from the criteria would raise questions about the “substantial equivalence” of any application. The policy was not intended to lower the standards of professional competence, and the foundation of those standards has been set in the CSAC Standards.

CONCLUSION

Overall, it is the view of the College that the registration practices reflect the requirements set out in the *Fair Access to Regulated Professions Act*. The College continues to strive for fairness, transparency, objectivity and impartiality with regard to processing all applications for registration with the College. The current review of registration practices confirmed that there are some areas to which the College should and will pay attention. Specifically, while the College has begun to implement strategies that will improve the timeliness of decisions and responses and reasons to applicants who apply for registration based on a combination of academic qualifications and experience, further improvement is required. Furthermore, the College will monitor the new registration requirement whereby all applicants must have engaged in the practice of social work or social service work, as the case may be, within the five years immediately before the date of the applications or otherwise satisfy the Registrar that he or she is competent to perform the role of a social worker or social service worker, as the case may be.

STATEMENT OF APPROVAL