College of Opticians of Ontario

BRIEFING NOTE

TO: **Board of Directors**

FROM: **Stephanie Kelly, Chair, Quality Assurance Committee**

DATE: **November 30, 2026**

SUBJECT: **9.0 Outsourcing Accreditation of Continuing Education**

☒ For Decision ☐ For Information ☐ Monitoring Report

Purpose:

To review additional information relating to the proposal to outsource accreditation functions to NACOR.

Background:

At its meeting in September 2026, the Board reviewed a proposal put forward by the Quality Assurance Committee to outsource accreditation functions to the National Alliance of Canadian Optician Regulators (NACOR). Following a brief discussion, the Board determined to table the item to a subsequent meeting in order to allow for additional time to discuss the issues in greater depth.

Following the meeting, the administrative team circulated a survey to Board Members to identify whether any additional information was required to support the discussion.

For Consideration:

The survey results are attached as **Appendix A**. Based on the responses received, the following information is provided to supplement the Briefing Note delivered with the September 28, 2026, meeting package.

Impetus for bringing this forward

More information was requested on the impetus for bringing forward the proposal to outsource accreditation.

Discussions around the COO's accreditation functions have arisen from time to time at the Committee and Board level. The COO engages in regular dialogue with continuing education (CE) providers to ensure an adequate supply of CE activities continue to be available to support the learning needs of Registered Opticians. CE providers who develop content for multiple Canadian jurisdictions have indicated that they are facing potential barriers to bringing their content to Ontario, as it requires them

to seek accreditation through both NACOR and the COO separately. While the results from both organizations are typically the same, the process creates duplication of work and additional costs for the CE providers. This has been flagged as leading to a potential reduction in the amount of CE available in Ontario should providers opt not to seek dual accreditation.

Against that backdrop, NACOR advised that as a result of a recent restructuring and expansion of their staff complement, it has additional capacity to take on Ontario's accreditation functions, should the COO wish. NACOR is currently accrediting continuing education (CE) content for the other provinces (apart from Quebec) and noted similar feedback from (CE) providers who find the current process duplicative.

Alternatives Considered

More information was requested on what alternative options were considered by the COO.

At this time, the COO is not aware of any other external service provider that would be able to provide this service. NACOR has subject matter expertise and already provides accreditation services to the other provinces. It was noted that another accreditation service would not address the concerns brought forward by CE providers around duplication of process and cost.

Financial Impact

More information was requested on the financial considerations related to the proposed action.

The College currently realizes approximately $10,000 per year in net profit from accreditation requests (revenue less committee expenses; not including staff time or data maintenance costs). Overall, accreditation is not a material source of revenue, and the Committee considered it to be a net neutral factor in its assessment of the proposal.

The Committee noted that processing accreditation requests is estimated to take up approximately 10% of staff time, and that these resources could potentially be redirected to other Quality Assurance Program functions, such as Peer and Practice Assessments.

Consistency of Decision Making

More information was requested on the research done to assess whether there was consistency in decision-making as between the COO's accreditation panels and NACOR.

A review was carried out of every activity accredited by both the COO and NACOR from 2023 through to September 2026. In total, 591 activities were reviewed.

The results were as follows:

- 580 (98%) were granted identical accreditation values by the COO and NACOR.
- 11 activities were granted accreditation by NACOR but denied accreditation by COO. On review, 10 of these 11 activities were found to have been denied accreditation due to specific provisions of the COO's Accreditation Policy that did not have parallel provisions in the policies

being applied by NACOR. In other words, the differences were attributable to difference in policy requirements, not to a difference in reviewer judgement or quality of review. Specifically:

- 4 requests were denied accreditation in Ontario because the activities focused on product promotion (section 4).
- 2 requests were denied because the content was not adequately connected to the identified competencies (section 2).
- 1 request was denied because the activity included subject matter was outside the speaker's field of specialization (section 5).
- 1 request was denied because the presentation was found to include content and images that may be considered unprofessional (section 6).
- 1 request was denied because the material did not appear to be evidence based (section 8).
- 1 request was denied because it failed to meet two policy requirements - section 5 (subject matter was outside speaker's field of specialization) and section 6 (unprofessional content)

There was only one instance where a different outcome was reached by COO and by NACOR. The activity in question was denied accreditation by COO because it was found not to be substantially different from another accredited activity offered by the same provider. The policy being applied by NACOR included a similar provision, but in that case, NACOR determined to accredit the activity. The Committee noted that neither the COO's policy nor the one being applied by NACOR in this instance included a definition of "substantially different", and that the COO policy could be amended to provide additional clarity on expectations for how this provision is to be interpreted going forward.

In sum, following an extensive review, only one instance found where the College and NACOR, applying similar policy criteria, reached a different accreditation decision. The Committee was therefore satisfied that NACOR's review process was robust and yielded substantially similar outcomes to that of COO. The Committee furthermore noted that, if outsourcing proceeds, NACOR will be apply Ontario's Accreditation Policy to Ontario accreditation decisions, and that the COO's policy could be updated as needed to ensure consistent application of the COO's criteria.

Outsourcing and Oversight

Regulatory bodies commonly engage specialized external providers to carry out discrete operational functions where doing so improves efficiency, consistency, access to subject matter expertise, and reduces duplication for the regulated community. Outsourcing a function is not considered to be an abdication of responsibility; the COO remains fully accountable for accreditation decisions and for the outcomes of the program. NACOR would only function as a service provider, applying Ontario's Accreditation Policy as established, approved, and updated by the Quality Assurance Committee, with no authority to alter or diverge from it. Appropriate safeguards would be in place, including a quality control panel that maintains COO oversight, regular monitoring of performance, and the COO's ability to review, amend, or end the arrangement if the standards are not met.

College of Opticians of Ontario

Comparison of Processes

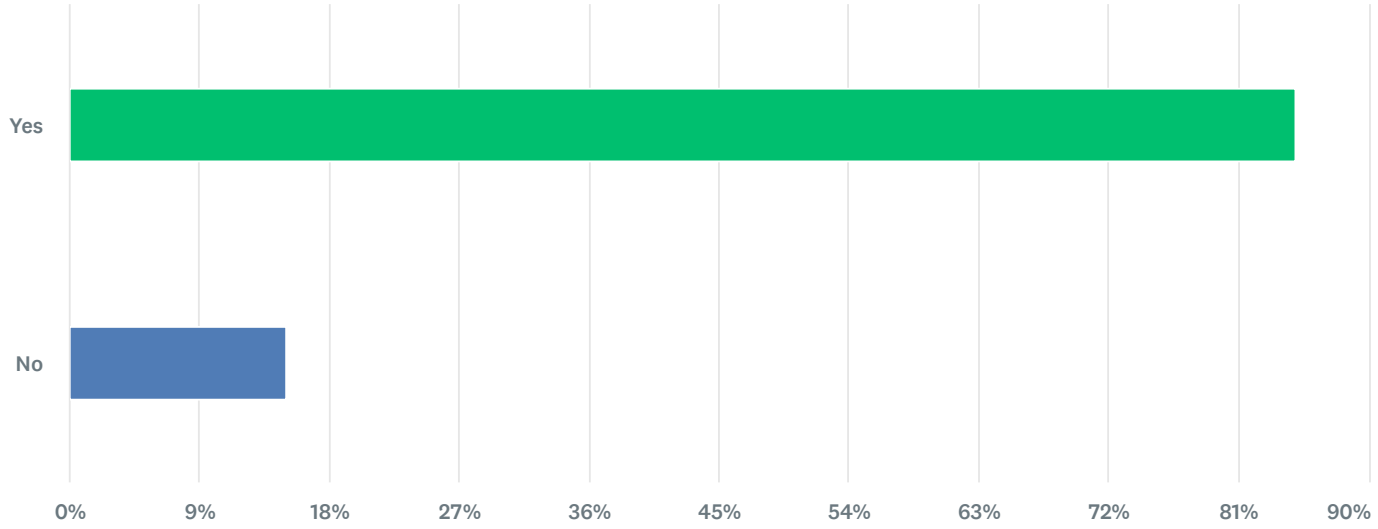
A table providing a more details comparison of the COO and NACOR processes is appended as **Appendix B**.

Recommendations/Action Required:

That the Board make a decision on whether to approve outsourcing accreditation to NACOR, in accordance with the model proposed in the Briefing Note presented to the Board on September 28, 2026.

Q1 20 responses

Did you feel the information provided in the briefing note was satisfactory?



Answer Choices	Percentage	Selections
Yes	85.00%	17
No	15.00%	3
Total		**20**

Q2 If not, what additional information may be helpful in reaching a decision?

Answered: 6 Skipped: 14

#	RESPONSES	DATE
1	More time to sort through different perspectives including short, mid and long term.	11/7/2026 2:45 PM
2	Financial impact and better explanations on how this decision can maintain our standards.	11/7/2026 10:42 AM
3	It did not provide other alternatives that were considered. Nor does it outline the necessity to review this process and look at outsourcing. The current process should have been outlined in more detail as not all board members/opticians attending/public members may not be aware of the process. As a public member, outsourcing accreditation to another entity negates the responsibility of the College to public members. Even with audits, reviews, etc., the College is passing the responsibility of continued education and professionalism to another organization. From a risk management standpoint, the College faces greater scrutiny in moving forward with this change.	11/2/2026 4:54 AM
4	More data on current college costs	11/1/2026 7:37 PM
5	very helpful info	10/28/2026 12:42 PM
6	I believe the why was not expressed convincingly, I believe equivalency of process and panel expertise was not shown / proven, I do not think DEI and public safety for Ontario was fully addressed in the proposed process, I think there's a fundamental concern with handing so much to an outside organization - PLAR, Exams, and CE - without direct public oversight.	10/27/2026 4:45 PM

Appendix B

Comparison of Processes

The following table is provided for additional clarity and comparison purposes.

	COO	NACOR
Application Process	CE Provider submit separate applications to COO and NACOR.	CE Provider submits a single application to NACOR.
Fees	CE provider pays separate fees to COO and NACOR.	CE Provider pays a single fee to NACOR.
Review Process	Activities are reviewed by a 3-member panel of registered opticians appointed by the Board.	Activities are reviewed by a NACOR staff member. If clarification is required on any aspect of the assessment, the reviewer may request a second review by another NACOR staff member. COO would retain oversight via a quality-control panel.
Policy applied to content being accredited in Ontario	Ontario's Accreditation Policy, as established, approved, and updated from time to time by the Quality Assurance Committee.	Ontario's Accreditation Policy, as established, approved, and updated from time to time by the Quality Assurance Committee NACOR would have no authority to alter, amend, or diverge from the COO's policy.
Professionalism/DEI Review	A portion of activities are reviewed by one community appointee for compliance with the professionalism and DEI requirements of the Accreditation Policy.	All activities will be reviewed by a NACOR staff member for compliance with the professionalism and DEI requirements of the Accreditation Policy
Scope of Accreditation	Accreditation is granted for Ontario only.	Accreditation may be granted for Ontario and any other jurisdictions that the CE provider applies for. Accreditation values are specific to each province's respective policies.

Risks	**Perceived endorsement:** Accreditation by the College may be viewed as endorsement of the underlying product, service, or clinical approach. This presents a reputational risk to the College in the event that an accredited activity promotes a product or practice that later becomes controversial or associated with patient harm. **Reduction in supply of CE content:** CE providers have identified that the current process results in duplication of work and costs. This has been identified as a potential barrier that may result in a reduction in CE content available in Ontario should providers opt not to seek a second accreditation.	**Overreliance of a single service provider**: Outsourcing accreditation to NACOR could increase the College's reliance on a single service provider. NACOR currently administers National Exams and PLAR on the College's behalf. **Reduced oversight:** Outsourcing will result in reduced oversight of accreditation functions. This risk is mitigated by maintaining a Quality Control Panel, as well as regular monitoring.