

## BRIEFING NOTE

**TO:** Board of Directors

**FROM:** Quality Assurance Committee

**DATE:** September 28, 2026

**SUBJECT:** 13.0 Outsourcing Accreditation of Continuing Education

☒ For Decision ☐ For Information ☐ Monitoring Report

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### Purpose:

To consider outsourcing the review and accreditation of continuing education (CE) activities to the National Alliance of Canadian Optician Regulators (NACOR) with appropriate College oversight.

### Background:

Under the *Regulated Health Professions Act, 1991* (RHPA), Ontario's health regulatory colleges are required to administer Quality Assurance (QA) programs that promote continuing competence and support the delivery of safe, ethical, and professional care in the public interest. The College's Board establishes the requirements of the QA Program, and the Quality Assurance Committee is responsible for administering the program and monitoring its effectiveness.

A core component of the QA Program is the annual Professional Portfolio. Registered Opticians must complete 16 hours of continuing education (CE) each year, of which at least 12 hours must be accredited. Accreditation supports the College's ability to provide registrants with access to learning activities that are relevant to opticianry and aligned with the Program's continuing-competence objectives.

The Quality Assurance Committee currently oversees the accreditation of CE activities. Applications are reviewed by panels appointed by the Board against the criteria in the Committee's [Continuing Education Accreditation Policy](#) (Accreditation Policy). The process is intended to confirm that accredited activities are sufficiently relevant, appropriately supported, and suitable for inclusion in the QA Program.

Accreditation signifies that the activity has been assessed against the Accreditation Policy and assigned an appropriate CE value. It does not constitute the College's endorsement of any product, service, individual, organization, or every factual statement contained in the activity.

NACOR performs CE accreditation for the other Canadian provinces, excluding Quebec, using criteria that are broadly comparable to the College's. Because Ontario maintains a separate process, providers seeking recognition in Ontario and elsewhere in Canada must submit parallel applications, pay separate fees, and respond to two review processes for substantially the same activity.

Although the College and NACOR apply similar accreditation criteria, their review models differ in two material respects:

- The College assigns three optician reviewers to each application, whereas NACOR generally relies on one staff reviewer.
- The College refers a portion of applications to an appointed Community Member for review of professionalism, anti-discrimination, and related policy expectations.

The current model provides the College with direct control over accreditation decisions, but it also consumes staff and Committee capacity and may create a perception that the College endorses individual CE activities. The Committee is therefore considering whether NACOR could deliver the operational review on the College's behalf while the College retains policy control, quality assurance, audit authority, and mechanisms to address concerns. This approach is intended to preserve Ontario-specific safeguards while redirecting College resources to higher-risk QA priorities.

#### **For Consideration:**

The QA Committee proposes that the review and accreditation of CE activities be outsourced to NACOR, with appropriate College oversight.

Under the proposed model:

- NACOR would review and accredit CE activities on the College's behalf going forward, following the College's Accreditation Policy.
- The College would no longer collect accreditation-related fees; NACOR would collect all accreditation-related fees and bear the corresponding administrative costs.
- Staff time currently spent administering accreditations would be redirected to QA Program oversight and administration.
- CE providers looking to accredit content in both Ontario and other provinces would not need to apply to separate bodies for review and accreditation.

## Analysis:

### *Operational Benefits*

From an operational perspective, transferring accreditation functions to NACOR offers the following potential benefits:

- **Arm's-length decision-making:** Transferring the review process to NACOR would separate the College from individual accreditation decisions, particularly when concerns or complaints arise about a specific activity. Although the Accreditation Policy states that accreditation does not constitute endorsement, direct accreditation by the College may still be perceived as confirmation of every factual statement in the material. In practice, the review establishes that the content meets the policy requirements and is adequately supported by appropriate sources.
- **Reduced administrative burden:** Transferring accreditation to NACOR would reduce staff time spent validating materials, processing requests, invoicing providers, coordinating panel reviews, and following up with submitters. Staff estimate that each activity requires approximately one hour to administer. At 180–200 activities annually, this represents approximately 10–12% of staff time, or about five weeks each year.
- **Reallocation of staff capacity:** Reduced administrative work would allow QA staff to focus on functions requiring College-specific judgment and oversight, including monitoring compliance, supporting registrants through the portfolio process, identifying trends, and addressing higher-risk matters that require analysis or escalation.
- **Reduced Committee workload:** Fewer routine CE reviews would free Committee and panel capacity for accreditation oversight, trend monitoring, and review of exceptions or concerns.

### *Implementation Considerations and Supports*

The Committee identified certain implementation considerations, as well as measures to support alignment, transparency and ongoing collaboration:

- **Accreditation outcomes:** An extensive review of activities accredited by both the College and NACOR from 2023 to date found that NACOR generally assigned the same accreditation values as the College's panels, with no material difference between the outcomes of the two processes. The limited differences identified arose when the College applied an Ontario-specific policy criterion. While the College uses a panel-based process and NACOR generally relies on one staff reviewer, the review indicates that both approaches produce broadly consistent decisions.

Although NACOR's accreditation outcomes are generally consistent with the College's, the Committee concluded that an oversight and quality-control process would provide additional assurance that Ontario activities continue to meet the Accreditation Policy, including expectations related to professionalism, anti-discrimination, and inclusive practice. The proposed controls include orientation for NACOR staff, appointing a quality-control panel to review a sample of activities, and regular reports on application volumes, outcomes, accreditation categories, denied or deferred applications, and matters requiring clarification or a second review.

- **Ongoing College oversight:** Under the proposed model, NACOR would manage individual accreditation decisions while the College would continue to monitor how Ontario-specific criteria are interpreted and applied. A quality-control panel would a representative sample of accredited activities, such as 10–15% annually, compares its results with NACOR's decisions, and identify opportunities for clarification or further guidance. The College would also retain authority to audit activities, suspend or revoke accreditation where necessary, and address urgent concerns or complaints.

Over time, this process would allow the College to monitor the effectiveness of the outsourced model, identify whether additional guidance is needed, and adjust the level of oversight based on risk, consistency, and the Committee's confidence in NACOR's application of the policy.

- **Impact on revenue:** Outsourcing would end the College's collection of accreditation fees and eliminate the small net surplus associated with the in-house process. However, the net revenue associated with accreditation does not take into account staff time and internal resources required for intake, invoicing, panel coordination, provider follow-up, and documentation. Each routine request requires approximately one hour of staff time. At 180–200 activities annually, this represents approximately 10–12% of staff time, or about five weeks each year. The Committee concluded that reallocating this capacity to higher-value QA work that more directly supports public protection would offset the loss of the modest surplus.

### ***Proposed Course of Action***

The Committee recommends that the Board approve outsourcing the review and accreditation of continuing education activities to NACOR, subject to the following safeguards:

- Require NACOR staff to complete training on the College's Accreditation Policy.
- Appoint a quality-control panel to independently review a representative sample of accredited activities (10–15%) and compare its conclusions with NACOR's decisions.
- Retain the College's authority to audit activities and to suspend or revoke accreditation where necessary.
- Require NACOR to report regularly on application volumes, outcomes, accreditation categories, denied or deferred applications, and matters requiring clarification or a second review.
- Establish a process for registrants to escalate feedback and concerns to the College for resolution with NACOR.

The proposed model would provide a transparent and efficient accreditation process while allowing the College to focus resources on higher-risk matters and its core public-protection responsibilities.

**Public Interest Considerations:**

Outsourcing CE accreditation to NACOR would serve the public interest by promoting a more consistent and efficient process and allowing the College to focus on QA oversight and higher-risk matters. NACOR would commit to applying the College's Accreditation Policy to Ontario activities, which would help ensure that opticians continue to have access to relevant, current, evidence-informed education aligned with professional and ethical practice expectations.

**Diversity, Equity, and Inclusion Considerations:**

Outsourcing may reduce the College's direct oversight of whether CE activities meet expectations related to professionalism, anti-discrimination, and inclusive practice. To address this risk, the proposed safeguards would require continued oversight and regular quality-control reviews to ensure that activities accredited for Ontario align with the College's expectations for diversity, equity, inclusion, cultural safety, and public protection.

**Risk Management Considerations:**

Although NACOR has indicated that it would apply the College's Accreditation Policy to Ontario activities, outsourcing will necessarily involve less direct oversight of individual decisions. Risks include inconsistent interpretation of the criteria, accreditation of activities that do not fully meet expectations related to evidence, neutrality, professionalism, anti-discrimination, or public protection, and uncertainty about how concerns or complaints would be resolved. The proposed reporting, audit, review, and escalation mechanisms would mitigate these risks while preserving the College's oversight and quality-control role.

These risks would be mitigated through clear expectations and safeguards, such as requiring NACOR to apply the College's Accreditation Policy for Ontario activities, documenting accreditation decisions, reporting regularly to the College on activities accredited for Ontario, identifying when a second review is required, and establishing a process for the College to review or reconsider an accreditation decision where concerns arise.

Retaining accreditation internally preserves direct control but also creates risks. College accreditation may be perceived as endorsement of an activity despite the policy disclaimer, exposing the College to reputational harm if concerns later arise. The in-house model also places continuing pressure on staff and Committee resources.

An arm's-length model would mitigate these risks by assigning operational decision-making to NACOR while preserving the College's policy authority and oversight.

**Recommendations/Action Required:**

That the Board approve outsourcing CE accreditation to NACOR, subject to NACOR applying the College's Accreditation Policy to Ontario activities and the College retaining oversight through regular reporting, periodic audits, quality-control reviews, and a process for addressing concerns or complaints.