

BRIEFING NOTE

TO: Board of Directors

FROM: Derick Summers, Chair, Registration Committee

DATE: September 28, 2026

SUBJECT: Policies Relating to PLAR
Appendix A: PLAR Policy

☒ For Decision

☐ For Information

☐ Monitoring Report

Purpose:

To consider rescinding the Internationally Educated Applicants Policy and approving the new proposed PLAR Policy.

Background:

The Internationally Educated Applicants Policy was first approved on June 20, 2006, and was last revised on December 4, 2023. The intention of this policy was to detail how an international opticianry graduate could have their education evaluated via the Prior Learning Assessment and Recognition (PLAR) process so that they may be able to submit an Intern Optician application to the College of Opticians of Ontario (COO).

Under the previous regulation, PLAR was only explicitly available to applicants who were educated in opticianry outside Canada, although since at least 2015 or prior the College nevertheless made PLAR available to all applicants from unaccredited programs. Changes to the [Registration Regulation](#) in 2024 allowed COO to officially offer a PLAR pathway for graduates of all unaccredited opticianry programs, not just international graduates.

In addition, the Registration Committee made the decision at their February 10, 2025, meeting to delegate the PLAR process to the National Alliance of Canadian Optician Regulators (NACOR). Previously, the PLAR process was shared between COO and NACOR. The decision to delegate the PLAR process was made to increase the efficiency of COO operations, ensure consistency with other provincial bodies (who also delegate their PLAR process to NACOR), and would assist in keeping the process objective.

For Consideration:

The Committee proposes that the Internationally Educated Applicants Policy be rescinded and replaced with the PLAR Policy (Appendix A). The new proposed policy shifts focus away from the mechanical aspects of PLAR process itself, since this is now managed externally by NACOR, and instead focuses on delineating how the Registration Committee has chosen to exercise its discretion and authority with respect to applicants who pursue PLAR as their chosen pathway to licensure.

Some of the key sections of the proposed policy are as follows:

- **Program similarity:** Under the regulation, to be eligible for PLAR, the applicant must have graduated from a program that is similar but not equivalent to an accredited opticianry program. The current policy did not include any criteria for what “similar” would mean in this context. The proposed policy includes a section that establishes that for a program to be considered “similar” it must be reasonably aligned with the core elements of the National Competencies for Opticians. The proposed language is aimed at articulating that there must be some reasonable connection between the applicant’s education program and the core competencies of opticianry, without being too narrow so as to exclude qualified candidates. The proposed policy goes on to include language that would direct NACOR to seek a determination from the Committee where necessary on whether a program is “similar” for our purposes.
- **Approval of NACOR’s PLAR process:** The current policy is based around the previous model of PLAR administration, which was done jointly by the COO and NACOR. The proposed new policy accounts for the Committee’s delegation of the PLAR process to NACOR. The Registration Committee reviewed NACOR’s PLAR process being administered on behalf of other Canadian provinces and determined that NACOR’s process was similar and able to successfully assess whether graduates from an unaccredited program had knowledge of the core opticianry competencies. The proposed inclusion of the delegation to NACOR provides transparency to applicants and the public, and satisfies the requirement under the Regulation that the Registration Committee approve the PLAR process for the purposes of this pathway to licensure.
- **Successful completion of PLAR:** The current policy does not expressly define what will qualify as “successful completion” of the PLAR process, or provide timeframes for completion of bridging modules. In the proposed new policy, the following definition is provided for successful completion of the PLAR process:
 - Obtaining a CGA result that shows no gaps in knowledge/skill (i.e. no bridging assigned);
 - Or
 - Obtaining a CGA result that identifies gaps AND completing any corresponding bridging modules. However, where more than 85% of bridging modules are assigned, the PLAR will be considered unsuccessful.

This definition of successful completion is added for clarity and transparency, and the standard will be applied by the Committee when reviewing CGA results to identify applicants whose knowledge

gaps are considered too significant to remedy with bridging alone. It is proposed that an 85% threshold be implemented for this purpose, as this is consistent with current committee practice. Additional research is being carried out, however, into whether this threshold continues to align with relevant professional knowledge standards, and the threshold will be revisited once the research is complete.

The proposed new policy also expressly outlines that bridging modules must be completed within the timeframe specified by NACOR. A process for requesting extensions is also specified.

- **Accommodations and other concerns:** Currently, requests for accommodations related to the PLAR process are handled by NACOR directly. Registrants who continue to have concerns about accommodations or other aspects of the PLAR process can escalate their concerns to the COO if necessary. This process, however, is not currently addressed in the policy. The new proposed policy includes a section detailing the steps applicants can take if candidates have any questions or concerns about their PLAR results or require accommodations. Noting these steps formally in a written policy are aimed at providing additional transparency and clarity to ensure applicants' needs are being properly met.

Proposed Course of Action

In sum, the Registration Committee recommends that the Board **rescind** the current Internationally Educated Applicants Policy and **approve** the new proposed PLAR Policy.

This proposed course of action will account for the changes that have taken place since the current policy was last considered, including the regulation change and the express expansion of PLAR eligibility to Canadian-educated applicants from unaccredited programs.

In addition, the new proposed policy more clearly documents how the Committee is exercising its authority under the Regulation, including its approval of NACOR's PLAR process and its criteria for determining program similarity and expectations for successful completion of PLAR by setting out these elements expressly. The proposed policy supports a more transparent, consistent and defensible framework for decision-making in relation.

Public Interest Considerations:

The Registration Committee recognizes that it is in the public interest for there to be a fair and robust process for assessing the skills, knowledge and judgment of applicants from unaccredited programs who are seeking registration in Ontario. The proposed policy aims to clearly and transparently articulate how the Registration Committee is exercising its authority under the Registration Regulation with respect to this pathway to licensure, in a manner that balances fair access against a robust and defensible skill assessment aimed at ensuring qualifying opticians will practice competently, safely, and ethically.

Diversity, Equity, and Inclusion Considerations:

The Registration Committee believes the proposed new policy prioritizes accessibility and flexibility by approving a PLAR process that can be remotely completed from anywhere in the world. The proposed addition of language around the accommodation, escalation, and extension request process allows transparency for applicants by formalizing a previously internal process.

Risk Management Considerations:

The Registration Committee considered that the proposed policy aims to reduce legal risk by clearly documenting how the Committee is exercising its authority under the Regulation, including by giving formal approval to NACOR's PLAR process, providing criteria to assess program similarity, and clearly defining successful PLAR completion.

In addition, the proposed addition of the escalation and accommodation section aims to clearly articulate the respective roles and responsibilities of the COO and NACOR thus mitigating the risk of confusion or misunderstanding. The language is proposed to outline for candidates how to seek accommodations or address their concerns.

By making these criteria explicit, the policy supports consistent, defensible decision-making and reduces the risk of ambiguity, misunderstanding, or challenge by applicants.

Action Required:

That the Board rescind the Internationally Educated Applicants Policy and approve the PLAR Policy, or request a further review.

REGISTRATION POLICY

PLAR Process

In this policy, an **Unaccredited Education Applicant** is an applicant to the College of Opticians of Ontario (COO) who completed their opticianry education at a program inside or outside Canada that has not been accredited by the COO's Registration Committee.

To be eligible for a certificate of registration as a Registered Optician, Unaccredited Education Applicants must successfully complete a prior learning assessment approved by the Registration Committee. This is referred to as the **Prior Learning Assessment and Recognition (PLAR)** process.

Eligibility for PLAR

1. To be eligible for PLAR in Ontario, applicants must have successfully completed and graduated from a program outside of Ontario that is similar but not equivalent to an opticianry program listed in the COO's [Approved Education Program Policy](#).
2. For a program to be considered "similar" for the purposes of this policy, it must be reasonably aligned with the core elements of the [National Competencies for Canadian Opticians](#).

Approved PLAR Process

3. The Registration Committee has approved the PLAR process administered by the **National Alliance of Canadian Optician Regulators (NACOR)** for the purposes of assessing prior learning for Unaccredited Education Candidates.
4. The PLAR process consists of the following steps:
 - a. *Step 1 - Competency Gap Analysis (CGA)*: an online skills assessment, consisting of two sections:
 - i. Eyeglasses and low vision
 - ii. Contact lenses

All PLAR candidates must complete a CGA. The CGA may be completed inside or outside Canada.

- b. *Step 2 - Bridging Modules*: online self-study learning modules, including post-tests, on specific areas of competency. Bridging modules must only be completed where one or more knowledge gaps are identified through the CGA.

Applying for PLAR

5. Unaccredited Education Applicants must apply directly to NACOR to complete the PLAR process and pay all associated fees. For further details and to apply, please visit [NACOR's website](#).
6. NACOR will carry out an initial review of the application. If necessary, NACOR may request a determination from the Registration Committee on whether the applicant's education program is sufficiently similar to an Approved Education Program to qualify for PLAR.

Successful Completion of PLAR

7. Successful completion of PLAR, for the purposes of meeting the requirements for registration under the COO's Registration Regulation¹, means:
 - a. Obtaining a CGA result that shows no gaps in knowledge or skill; or
 - b. Obtaining a CGA result that identifies gaps in one or more areas of knowledge or skill, provided that:
 - i. The identified gaps do not result in the applicant being assigned more than 85% of the possible bridging modules; and
 - ii. The applicant obtains a passing mark on the post-tests for each bridging module that is assigned and identified as "mandatory" within the timeframe specified by NACOR.

Note: If the CGA results in the applicant being assigned more than 85% of the possible bridging modules, PLAR will not be considered successfully completed.

Accommodations, Extensions, Questions and Concerns

8. Requests for accommodations for any portion of the PLAR process should be made directly to NACOR.
9. Requests for extensions to complete bridging modules should be made to the Registration Committee by contacting registration@collegeofopticians.ca. A committee review fee of \$150 + HST will apply.
10. All other questions or concerns about the PLAR process or results should be directed to NACOR at plar@nacor.ca. Applicants who continue to have questions or concerns after communicating with NACOR may contact the COO at registration@collegeofopticians.ca.

Next Steps

11. Following successful completion of the PLAR process, Unaccredited Education Applicants must complete the following additional steps to become entitled to practice opticianry in Ontario:
 - a. Apply for registration as an Intern Optician. Please note that applicants will be required to submit all required [supporting documents](#), including proof of Practicum completion.
 - b. Challenge and pass the National Examinations (Eyeglasses and Contact Lenses).
 - c. Apply for registration as a Registered Optician. Please note that applicants will be required to submit all required [supporting documents](#), including a Vulnerable Sector Check.

¹ Registration Regulation, O. Reg. 32/24 under the *Opticianry Act, 1991*, section 7(1), para. 1(iii).