

## Answers to Frequently Asked Questions About: *The CCP*

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### *Background*

The questions and answers contained in this document are compiled from questions and comments raised in the survey responses and focus groups conducted as part of ACOT's Continuing Competency Program (CCP) Review (April-July 2019) and along with questions fielded by ACOT staff since the launch of the updated version of the CCP in the new online platform.

For instructions on how to navigate the online platform, please refer to the CCP Step-by-Step Guide accessed from the [CCP Resources](#) page of the ACOT website.

Questions or comments along a similar vein have been grouped with a common response provided. If you have a question that is not in this list, please email your question to [info@acot.ca](mailto:info@acot.ca) and one of the ACOT staff will get back to you as soon as possible.

- A. [Regulatory Requirements](#) (the why of the CCP explained)
- B. [The CCP Components](#) (what to complete, when to complete it and how much to include)
- C. [CCP Review and Evaluation \(Audits\) and Practice Visits](#) (who is looking at your CCP)
- D. [Miscellaneous Q&As](#) (what to complete when on leave of absence, aligning CCP completion with employer-mandated performance agreement schedules)

NOTE: Answers to questions fielded from OTs in non-clinical roles or unique practice areas who find it challenging to select areas of focus to set goals for from ACOT's Standards of Practice and Code of Ethics indicators, are being compiled into a "Making the CCP Work for You" document. This document will be posted in the [CCP Resources](#) page once it is available.

\*This revision reflects a change in terminology to *Learning Plan* (previously termed *Action Plan*) to align with terminology used in the online platform

## Questions and Answers:

### A. Regulatory Requirements

- Why do I have to write everything down? Don't you trust my professional commitment to continuous learning?
- What happens if I don't complete my CCP according to ACOT's direction?

Having a Continuing Competence Program (CCP) is a requirement for all health professions regulated under the [Health Professions Act](#) (the HPA). Section 3(1)(c) of the HPA states:

*"A college must establish, maintain and enforce standards for registration and of continuing competence and standards of practice of the regulated profession."*

A CCP is one of the ways regulatory Colleges in Alberta ensure that the public receives safe and competent services from their registrants. Each regulatory body in Alberta was involved in determining how this requirement for a CCP would be met in their profession-specific regulations or standards of practice.

A reflective practice approach to the CCP was selected for the profession of occupational therapy (OT) in Alberta as it aligns well with the practice of OT and how OTs are trained. The CCP requirements for the profession of OT are listed in Section 13(1) of the [Occupational Therapists Professional Regulation](#) (OTPR) and include the annual completion of:

- a) a practice challenge log;
- b) a self-assessment questionnaire;
- c) a competence maintenance log; and,
- d) a continuing competence portfolio.

ACOT is responsible for determining how each of the required CCP components are operationalized and how registrants' continuing competence is monitored. Completion of all four components is mandatory and required for practice permit renewal as per the HPA and OTPR.

Also, [Standard of Practice](#) indicator 1.3 states that *OTs shall demonstrate continued competence as required by the Alberta College of Occupational Therapists*. Code of Ethics indicators 3.1 and 3.2 state that *OTs must review practice and engage in professional development and provide services only in areas of competence*. Registrants with incomplete or falsely completed CCP submissions would be considered to be non-compliant with the HPA, OTPR and the ACOT Standards of Practice and Code of Ethics and can be investigated for unprofessional conduct as per Section 51.1 (1) of the HPA which states:

*"If the competence committee, registration committee or registrar is of the opinion that a regulated member has intentionally provided false or misleading information about their continuing competence program, they must refer that information to the College's complaints director"*

- What is the intent of each of the Continuing Competence Program (CCP) components?

See the [Meeting CCP Requirements](#) page of the ACOT website for a depiction of the four required components and how they have been incorporated into the Self-Assessment and Learning Plan of the current CCP. The table on the following page provides additional information regarding the intent of the Self-Assessment and Learning Plan.

CCP requirement as per Section 13	CCP component	Intent
1. Self-assessment questionnaire	Self-Assessment	The exercise of self-assessment provides registrants the opportunity to reflect on how their practice adheres to the foundational elements/indicators of ACOT's <a href="#">Standards of Practice</a> <sup>1</sup> and the <a href="#">Code of Ethics</a> . It is within this component that registrants identify which of the indicators they would like to focus on for practice growth and continuous improvement in the upcoming registration year.
2. Practice challenge Log	Learning Plan	Completion of the second section and initiation of the first section occur during registration renewal.
3. Competence maintenance log	(all written content of the CCP is housed in this section)	The <u>first section of the Learning Plan</u> is where the selected areas of focus are listed and registrants: <ul style="list-style-type: none"> <li>a) reflect on why they have selected certain indicators to focus on in the upcoming year; and,</li> <li>b) specify a learning goal(s) to address the selected area(s) of focus for growth.</li> <li>c) identify which learning activities will be undertaken to achieve each goal in the upcoming registration year</li> </ul>
4. Competence portfolio		The <u>second section of the Learning Plan</u> is the place where registrants: <ul style="list-style-type: none"> <li>d) report on and record progress on the learning activities undertaken to achieve the learning goal using Learning Records; and,</li> <li>e) summarize and reflect on how the various learning activities have evolved and impacted practice.</li> </ul> <p>The newly added Learning Records are where registrants reflect on what they took away from each of the learning activities and can upload documents if appropriate or relevant.*</p> <p><i>*Examples of supporting documents that can be uploaded include samples of the OT's work that illustrate the quality of their practice such as redacted clinical case/chart notes, copies of materials prepared/presented, program development/evaluation reports, briefing notes, employer performance reviews, lists of articles/resources reviewed, etc. AND the Learning Record itself can act as a portfolio document on its own if it includes enough detail.</i></p>

- What we are expected to do seems to be more complicated than what other professional colleges expect. Are other colleges asking for this type of proof?

The HPA requires all health profession regulatory bodies listed in the Act to have some form of CCP for monitoring the ongoing competence of their registered members. The regulations for each profession outline,

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<sup>1</sup> A tenth standard of "Maintain Appropriate Boundaries" was added in 2019 to clearly define who is considered a "patient" for the purposes of the newly added sexual abuse and sexual misconduct provisions in Section 135(1) and (2) of the *Health Professions Act* which went into effect on April 1, 2019.

to varying degrees, what is required for registered members to demonstrate continuing competence (e.g. some regulations are very prescriptive, others less so and some not at all). Each college also operationalizes the intent of their CCP requirements differently. In addition to the CCP tools/methods used by ACOT, other colleges employ tools such as: peer review of practice; client satisfaction surveys; electronic portfolios; formal tracking and reporting of continuing education credits (both registrant-selected and college mandated education activities, with some colleges tracking credits in various categories) or jurisprudence exams.

- What does "competence" really mean? Can an OT's competence actually be determined from his/her/their CCP submission?

Competence is defined in Section 1 of the HPA as *"the combined knowledge, skills attitudes and judgement required to provide professional services."* Completion of all the CCP components does not directly reflect an OT's knowledge, skills, attitudes and judgement, however, the recording and reflection on the continuous learning activities that CCP completion requires is considered an indirect indicator of competence.

Regulators around the world acknowledge that more evidence is required to support or disprove that the various methods and tools used in health professional continuing competence programs. ACOT is committed to ensuring that our CCP acts as an accurate and reliable indicator of competence and will be seeking opportunities to initiate and/or participate in research activities that explore the effectiveness of our CCP as a reliable indicator of competence.

- Is it possible to switch to a CE (Continuing Education) or PD (Professional Development) credit system like what other colleges have?

There are no plans for ACOT to modify its approach to the CCP at this time.

For background, ACOT adopted the reflective practice approach to continuing competence in the early 2000's based on the evidence to support reflective practice in attaining entry-level competence (garnered from post-secondary institutions involved in the training of OTs and other health professionals). Research on the various methods/tools/approaches used by regulators to monitor continuing competence is challenging to undertake and thus is in early stages. However, evidence is mounting in the direction of reflective approaches versus the tracking/reporting of CE/PD credits. As a result of this mounting evidence, more and more professional bodies are shifting to a reflective practice approach for monitoring continuing competence.

- Can ACOT set and require a minimum number of hours required for CE/PD like Social Workers or Teachers have? This would help me to advocate with my employer for dedicated work time to complete my CCP activities.

ACOT's stance to date is that it is the quality of continuous learning activities undertaken, not necessarily the quantity of time spent on those activities, which matters in a reflective practice approach.

It is also ACOT's stance that although formal professional development can play a valuable and important role in continuing competence, there is also tremendous value in on-the-job training and other mentorship models, self-directed study and participation in non-clinical workplace activities such as program development or program evaluation. Also, setting a required number of hours or credits could place undue burden of effort and cost for OTs, particularly those on leave of absence or those working in part-time, sole-charge, or private practice roles/settings. It is also worth noting that this requirement could be burdensome for most OTs given that very few employers fund the cost of formal courses or offer paid education days.

However, in the [2019 CCP Review](#) and the *CCP Submission Review & Evaluation Survey* conducted in October 2020, an overwhelming number of survey respondents indicated a preference for some sort of continuing competence credit system. To address this preference, registrants can now track the number of hours spent in each of the learning activities undertaken to achieve their continuous learning goal(s) in the Learning Records of the CCP's Learning Plan.

ACOT is proposing that an evaluation of this new functionality be conducted 2-3 years from now to see if there is a minimum number of hours that ACOT could require all registrants to attain which could act as a benchmark going forward. Please note, nothing will proceed without consultation with registrants and approval of ACOT Council.

## B. The CCP Components

- How do I know if I am completing the CCP components properly? What is enough/relevant to include in a CCP submission and what is too much to include? Can examples be provided?
- Can a guide (in print and video form) be created that outlines when and how to complete the various CCP components?

ACOT has created several resources to guide you in completing the CCP components. This includes a CCP Step-by-Step Guide and a CCP Submission Rubric which offer guidance on when and what to complete and how much detail to include. These resources, along with others, can be accessed from the CCP Resources page of the [Continuing Competence](#) tab of the ACOT website.



- What does ACOT expect in terms of: how many areas of focus should be selected, or how many goals I should set each year?

You can select as many indicators listed in the Self-Assessment as you like but it is recommended that you choose only one to three of these as areas of focus to develop learning goals for - the system will block you from selecting more than three.

➤ How many learning activities should I select?

It is recommended that you identify no more than three learning activities for each learning goal as it is suggested you complete at least one “Learning Record” (which includes a reflection statement on how that particular activity has impacted your practice) for each learning activity selected. See the [CCP Step-by-Step Guide](#) for information on how to complete Learning Records, including examples of the type of content that can be included.

➤ Can I change my goals mid-year? How would I go about doing this if I can?

Yes, you can. This functionality is particularly important for registrants who change positions or employers during a registration year. As well, goals and activities you anticipate completing in a year may change for any number of reasons during a registration year. Refer to Section 2.e. of the Step-by-Step CCP Guide for details on how to edit or change your Learning Plan goals mid-year and ensure your old goal(s) is saved.

➤ Is it necessary to upload a supporting document if I have reflected on the activity(ies) undertaken in a Learning Record(s)?

When deciding whether to upload supporting documents to a Learning Record, use your judgement. If detailed content on how the particular learning activity impacted your practice is included in the text box of a Learning Record, it can act as a portfolio document itself so inclusion of a supporting document may be redundant or isn’t necessary to include. Alternately, if you have a document summarizing sessions attended and key takeaways from those sessions already completed, you can upload that document (in pdf or image form) and indicate “refer to attached summary of sessions attended and key takeaways from each of those sessions” in lieu of more detail in the text box. Refer to Section 2.c.iii. of the CCP Step-by-Step guide for various examples of how Learning Records can be completed.

- I got blocked from adding more than 12 Learning Records in my Learning Plan – why is there a limit?
- How do I include all of the attendance certificates I would have normally kept in my competence portfolio?

Setting a limit of 12 Learning Records assists with limiting the space required to store CCP submissions and it reinforces ACOT’s stance that it isn’t so much the quantity of activities undertaken but the reflection on how the learnings from the activities have evolved or impacted your practice that is important.

If you have attended multiple workshops/webinars/grand rounds/lunch & learn sessions or have reviewed a variety of learning/resource materials focusing on a similar topic, consider compiling those together into one Learning Record. Also, ACOT does not expect “proof of attendance” certificates to always be attached to a Learning Record (except in the case of the [mandatory Sexual Abuse and Sexual Misconduct modules](#)), as it is the summary and reflection on learning that CCP submission Reviewers will be looking at when they review and provide feedback on your CCP submission. See [Section 3](#) of this document for more details on the CCP submission Review and Evaluation process.

Registrants are encouraged to include only the most relevant documents which are illustrative of the quality of their practice and augment (not duplicate) content written in Learning Records. Documents that can be uploaded include: written feedback on performance (from employer, clients/families, peers), redacted clinical case/chart notes, copies of materials prepared/presented, program development/evaluation reports, briefing

notes, employer performance reviews, lists of articles/resources reviewed, etc.).

- Do I still have to keep portfolio records for five years now that we can upload supporting documents to Learning Records within the Learning Plan?

Keeping portfolio documents for five years was a required practice when ACOT was auditing paper versions of CCP submissions prior to shifting to online CCP submissions in 2014. At that time, ACOT had aimed to audit 20% of registrants each year (thus presuming a registrant could be audited once every five years). With the online platform now allowing for the upload of documents and the Learning Records themselves acting as a Competence Portfolio records, registrants no longer have to worry about retaining paper or electronic portfolio documents unless they wish to. The necessary information for CCP submission review and evaluation is retained and can be accessed by CCP submission Reviewers from within the platform.

- When am I supposed to fill in the goal completion status section?

There are three options to choose from in the goal completion section of the Learning Plan – completed, discontinued and ongoing.

A goal can be marked as completed or discontinued at any point during the registration year. The ongoing option is intended for use by OTs whose employer-mandated performance agreement schedule doesn't align with the ACOT registration year (e.g. school-based OTs). In this case, a goal could be created mid-year (e.g. in October), with some learning activities undertaken towards that goal, and carried forward into the next registration year for completion (e.g. in June). For more information on which goal completion status option to select and what type of detail to include, refer to Section 2.c.iv. of the CCP Step-by-Step Guide.

- If I've already reflected on my learning activities in a Learning Record do I have to reflect again?

If you only have one Learning Record included for a goal, you can indicate "refer to reflection on learning included in the Learning Record for this goal" unless there is additional information you wish to include in the goal reflection text box. If you have more than one Learning Record for a goal, use the goal completion status option (completed or ongoing) to tie together the learnings from the various activities into an overarching, summative reflection.

### C. CCP Review & Evaluation (Audit) and Practice Visits

- Is anyone looking at my CCP submission? If so, what are they looking for and what criteria will be used to determine the quality/acceptability of my submission?

The review and evaluation of CCP submissions (formerly known as audits) is a requirement in the OTPR which specifies in Section 14 (1):

*"The Registrar or Competence Committee must periodically select regulated members in accordance with criteria established by the Council for a review and evaluation of all or part of a regulated member's continuing competence program."*

The review and evaluation of CCP submissions will resume in the spring of 2021. A **Rubric** has been created which outlines the criteria Reviewers would be using to rate whether a CCP submission is acceptable or unacceptable. As well, the Policies and Procedures for the CCP Review and Evaluation process will be posted

on the [CCP Resources](#) page once they are available together with the other resources prepared to support OTs in completing their CCP submissions.

➤ The HPA and OTPR refer to “practice visits” – what are practice visits?

Practice visits\* are a tool described in the current iteration of the HPA that regulatory bodies can use if a registrant is not complying with the CCP requirements. Section 14(2) of the OTPR indicates:

*“If a regulated member does not comply with the continuing competence requirements set out in Section 13, the Register or Competence Committee may require the regulated member to submit to a practice visit.”*

\*Note, the term “practice visit” will be replaced by “assessments of regulated members’ competence” in once the amendments proposed in the *Health Statutes Amendment Act* are proclaimed.

ACOT envisions that practice visits would be undertaken if a registrant does not incorporate Reviewer feedback into his/her/their CCP within the required timeframe (in the following year’s submission for minor errors/omissions; within 30 days for significant errors/omissions as per the Rubric criteria).

➤ Is ACOT oversight of practice required? Is it not the employer’s role to oversee and address a clinician’s performance or practice issues?

This is correct – it is not ACOT’s mandate to monitor an OT’s performance. Performance assessment/performance management is the responsibility of an employer or the individual (if self-employed). ACOT’s public protection mandate is achieved through the regulation of ethical and competent OTs. Acceptable completion of ACOT’s CCP is the way each OT can demonstrate his/her/their commitment to continuous learning (as an indirect indicator of competent and ethical practice).

To clarify the purpose and intent of practice visits for registrants, ACOT Council has approved the following: *“A practice visit will be conducted on an ‘as needed’ or ‘as requested’ basis with the intent to determine whether the OT’s practice adheres to ACOT’s Standards of Practice and Code of Ethics.”*

## D. Miscellaneous Q&As

➤ What am I expected to complete when I am on parental (maternity/paternity) leave or any other unpaid leave?

This depends on whether you decide to cancel your registration or choose not to renew by the Feb 28/29 deadline while on maternity or other unpaid leave. If you are cancelling your registration, we suggest that prior to the start of your leave you document activities completed towards your goal(s) and reflect on how what you have done to date has impacted your practice; this will ensure you are compliant with the HPA/OTPR for when you resume registration and return to work. Otherwise, when you reapply for registration, you will be required to complete your last CCP and initiate a new CCP as soon as you register.

What has been described above also applies to other leaves of absence where you do not plan to use the occupational therapy title or practice as an OT.

Please also note that if the start of your leave of absence coincides with registration renewal and you were

planning on letting your registration lapse, you are required to login in to the online platform and formally cancel your registration. This ensures that you have an up-to-date report of practice hours and a complete and finalized CCP submission. It will also stop the automatic notification of cancelled registration going to your last known employer. See Section 5 of the [Guide to Registration Renewal](#) for more information about cancelling your registration.

More information on maternity/paternity leaves can be found [here](#).

- What am I expected to complete when I am on **paid** medical leave or any other **paid** leave?

When you are on a leave from work and are receiving pay or benefits from your employer based on being an OT, you are considered to still be using the title of OT even though you may not be practicing OT. As such, you are required to maintain your registration and update your CCP as/when you are able so that you can ensure you are compliant with the HPA/OTPR

- Why does the platform still time-out after 30 minutes?

The time out feature is required so that the platform can still adhere to the security standards for the protection of your personal information. The security standards followed by the platform developer also discourage the use of auto-save features on sites that house your personal information.

Given this required time out feature, you will still need to remember to *click the “Save for Later” button* when completing your Learning Plan and be careful not to leave the Learning Plan page to view any other pages within the platform (you can still open another tab in your web browser though). Anything you have worked on in the Learning Plan will be lost unless you have pressed the “Save for Later” button before leaving the page.

- You can open a new tab in your browser, just don’t click on another tab or page in the CCP unless you have clicked the “Save for Later” button.
- Your work will still be saved even after the 30-minute timeout as long as the “Save for Later” button has been clicked; you will be cued to log-in again.

- Can ACOT give reminders for us to refer back to our Learning Plans regularly?

With the new ability to access your CCP from a mobile device, it is anticipated that updating Learning Plans will be more convenient for registrants. If you need cues, set monthly or quarterly reminders on your device or computer calendar.

- I don’t feel like I am gaining anything from this process; sometimes I make up a lot of what I submit.

Completion of the CCP components by all registrants is ACOT’s way to adhere to its mandate to serve the public. You are required to undertake the activities of self-reflection and goal setting mindfully and seriously as adhering to the legislative and regulatory requirements are what allow ACOT, and other colleges under the HPA, the continued privilege of self-regulation. Including accurate information in your CCP is a requirement outlined in the HPA in Section 51.1 (1):

*“If the competence committee, registration committee or registrar is of the opinion that a regulated member has intentionally provided false or misleading information about their continuing competence program, they must refer that information to the College’s complaints director”*

- Can CCP completion align with the goal-setting process/performance agreements I am required to complete for my employer?

It is understood that employer-mandated performance management program schedules seldom align with the completion of the CCP components – this is most notable for OTs employed by school boards/districts who set employer goals in October for the school year ending in June. See Section 2 of the CCP Step-by-Step Guide for pointers on how to streamline your efforts while adhering to the completion deadlines of both the CCP and your employer performance management program requirements (specifically the use of the “ongoing” goal completion status option).

- Can I use my CCP in place of my employer performance agreement?

This will depend on your employer’s performance management program. Larger employers (like Alberta Health Services or Covenant Health) have set forms/processes to be used/followed by all managers and employees along with expectations for frequency of performance reviews. If your employer does not have a set performance management program, you can inquire about whether you can use a printout of the Learning Plan you complete for the CCP in lieu of an employer mandated program.

- Can I use my employer performance agreement in place of the CCP?

No, annual completion of the CCP components is a requirement in the HPA/OTPR and a complete submission is required for your practice permit to be renewed. We do encourage registrants to align their performance agreement goal(s)/activity(ies) with the learning goal(s)/learning activities in your Learning Plan whenever possible to support streamlined completion of both. You may also choose to upload your employer performance agreement to a Learning Record if it is relevant to your CCP learning goals or has additional detail beyond what has already been documented in your Learning Plan.

If you have any questions about how to complete the CCP, navigate the updated CCP platform, or have feedback on any of the resources prepared, feel free to call 780.436.8381 or email to [info@acot.ca](mailto:info@acot.ca).