Action Plan: College of Licensed Practical Nurses of Manitoba (CLPNM)



In response to the Fairness Commissioner's Recommendations, the College of Licensed Practical Nurses of Manitoba proposed the following action plan as of November 2012.

OMFC Recommendations		Action Plan	Status as of May 2016
1.	With regard to the assessment and	registration information, that CLPNM provide clear, complete and accurate information about:	
		CLPNM is currently developing an easy to use Guidebook for the internationally educated applicant. The guidebook will be available on the website. The website and the IEN section of the website are currently under revision.	Jan 2014
a.	The education standard and the criteria against which academic programs are evaluated;	A document outlining the CLPNM Educations Standards will be made readily accessible on the redeveloped website dedicated to IENs. A sample comparison document from an international educational establishment will also be provided to promote understanding.	Sep 2013
b.	The assessment of work experience and how it may qualify an applicant for a Clinical Competency Assessment;	The credential assessment (CA) application and administrative processes are currently undergoing a major internal review. The Guidebook will include clear and complete information relating to CLPNM's assessment process, including how work experience is used to assess an applicant's nursing competency and how work experience may qualify an applicant for a CCA.	Nov 2013
C.	The non-mandatory status of previous registration and work experience;	The Guidebook will advise applicants of the mandatory minimal documentation requirements including previous registration and work experience; however, the Guidebook will advise that graduates of nursing education programs without previous registration status and/or nursing work experience may still be eligible for a CCA. The Guidebook will advise that each applicant will be reviewed on a case by case basis and communication between the applicant and the College will be encouraged, and where alternative documentation may be used. In addition, information relating to the mandatory nature of the documentation will be included in the Guidebook.	Nov & Dec 2013
d.	Criminal records checks – that checks are not required from an immigrant's home country and the expiration dating policy;	The Guidebook will include information on Child Abuse Registry checks and criminal record checks including the need for a Canada wide check that includes vulnerable sector. CLPNM's expiration dating policy will be clearly indicated. Applicants will be given basic information regarding relevant agency contact information. May 2016: Note: the Guidebook also includes information about Adult Abuse Registry checks, which was added in January 2014.	Nov & Dec 2013
e.	The English and French language proficiency requirement, expiration dating policy for language tests and how the communication component of the Clinical Competency Assessment may impact the language test scores required;	The Guidebook will include clear and complete information relating to the language proficiency requirements including required benchmarks, approved language tests and CLPNM's expiration dating policies. The Guidebook will advise applicants that CLPNM reviews all aspects of the credential assessment, including language scores to make decisions regarding eligibility or need for a CCA. The Guidebook will advise applicants that on a case by case basis the CCA may be utilized to further assess language proficiency within the context of a nursing environment.	Dec 2013 Jan 2014
f.	Alternative documentation and the various accommodations surrounding documentation requirements;	The Guidebook will include information on each section detailing exactly what is required by the CLPNM, and give examples of where and when alternative documentation may be used. In addition, information will be included to describe possible accommodations surrounding documentation requirements. A frequently asked questions (FAQ) section will also be included and updated regularly, to assure timely and accurate information is always available. As each applicant's situation is unique, the need for alternative documentation and CLPNM's ability to accommodate alternative documentation cannot be clearly, completely and accurately described in a Guidebook or FAQ. In addition to the above actions, CLPNM will continue to encourage applicants to communicate their individual circumstances to the College. The CLPNM, in, turn will make every effort to allow for alternative documentation/accommodations while balancing our mandate of protection of the public.	Nov & Dec 2013
g.	Fees, fee timelines, total cost- range and financial support opportunities for the registration process, including	The Guidebook will include a flow chart to describe the process, including costs and timelines associated with the various stages of the process. A fact sheet of all the costs that are associated with the IEN application through to initial enrollment on the active practising register will also be included. Further, a fee schedule dedicated to the IEN will be made	Nov & Dec 2013

			Status as of
	OMFC Recommendations	Action Plan	May 2016
	the Clinical Competency Assessment, the PNQR Program and the Practical Nursing Refresher Program;	available in the IEN section of the website. The fee schedule will include all costs from initial application to exam fees to initial enrollment with the CLPNM. Links to Assiniboine Community College's Health and Human Services (nursing) webpage will be provided on the website. CLPNM would like to work in collaboration with the OMFC, to provide on the CLPNM website, appropriate and current links to available supports, financial and otherwise, offered to IENs undergoing the credentialing process.	
h.	Assessment results timelines, including the initial application assessment and the timelines surrounding the Clinical Competency Assessment;	The Guidebook will provide information regarding what timelines the applicant can reasonably expect for the initial application process. Timelines relating to the booking of a CCA, the CCA itself and the reporting of results of the CCA will be set out in the Guidebook. The CCA tool is a work in progress and as such is in a state of flux.	Nov 2013
i.	Holistic time range information about the registration process and the PNQR Bridging Program and the Practical Nursing Refresher Program;	ACC is now providing CLPNM a more detailed summary sheet of outcome of the applicant's CCA, which will enable more information on the outcome of the CCA to be provided to the applicant. The basis for each decision will be included in the information letter that is sent out after the CCA, which advises the applicant of the next steps in their progress.	July 2013
j.	An easy-to-navigate, step-by- step path of the assessment and registration process;	The Guidebook will include all timeline related information, specific to each stage of the PNQR and PNR process. The course work is customized to each applicant, and therefore may differ from person to person, thus this may not be possible to provide a generic timeline. However, the CLPNM will endeavour to ensure that realistic sample timelines be provided.	Nov 2013
k.	Access to records.	The Guidebook will include an easy to navigate flowchart of the entire process. There is the possibility that the flowchart can be utilized as a stand-alone document that would provide a simple schematic of the assessment and registration pathway that could be posted on the website. The applicant is currently able to obtain copies of all records provided to the CLPNM upon receipt of a completed application and associated administrative fee. CLPNM will ensure that information regarding records access is clearly articulated on the website and throughout the credential assessment process. CLPNM is currently in discussion with ACC regarding full access to the results of the CCA as the CCA is ACC's copyrighted document, and we are not able to proceed with releasing full information from a third party without their express permission. CLPNM will advise all stakeholders involved in the CCA and PNQR of the Fairness Commissioner's recommendation. May 2016: We have not posted the flowchart as a stand-alone document. It can be found in the Guidebook. The information for the 2 nd paragraph has changed with the inception of the NNAS in August 2014. Applicants now have access to their own Advisory Reports from NNAS, which includes information about all of the documents they have submitted, and which their third parties have submitted. Applicants can also request copies of records from the CLPNM for a fee; however, the CLPNM reviews third party information and may or may not be at liberty to provide copies (i.e. CCA results are received on a document that is owned by Assiniboine Community College). When the CLPNM cannot provide copies of documents, information is shared verbally or in our correspondence with the applicant.	Jan 2014
2. \	With respect to appeal processes:		
a.	That CLPNM provide complete, clear and accurate appeal information in the registration material and that appeal information accompanies any assessment decision subject to appeal;	CLPNM is currently creating an appeal fact sheet outlining appeal processes and timelines. This fact sheet will be made available on the website. Appeal information will be included in the Guidebook as well. All correspondence regarding appealable decisions will be included in the appeal fact sheet. Currently, all applicants whose registration is denied or subject to conditions receive written appeal information. The proposed appeal fact sheet will provide further clarity and direction to the applicant.	Aug 2013
b.	That CLPNM ensure the initial application assessment and the Clinical Competency Assessment are subject to appeal;	CLPNM is currently creating a new policy relating to appeal of credential assessment decisions, which will include decisions based on the CCA. Currently, all applicants whose registration is denied or subject to conditions receive written appeal information.	Aug 2013
c.	That CLPNM ensure the National Exam results are subject to full appeal, not restricted to re-scoring or issues	The National Exam is administered by a third party, and is based on a national standard set by regulatory authorities across the country. CLPNM is investigating the appeal process that is in place in other provinces, with a view to establishing a policy surrounding exam result appeals. Currently, any registrant who is unsuccessful in the third and final attempt of the	Aug 2013

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	of procedure;	national exam is informed of their right to appeal the denial of registration to the CLPNM Board.	
d.	That CLPNM formally introduce a pre-appeal step in the appeal process.	CLPNM recognises that a pre-appeal step is important in the process, and is investigating how to formalize such a procedure. CLPNM is currently reviewing pre-appeal processes utilized by other organizations and intends to establish a pre appeal process that will be shared with applicants. Until a pre-appeal process is formalized, CLPNM will continue to openly communicate and inform applicants of processes, decisions, reasons and appeal rights. CLPNM will continue to encourage applicants to communicate with the CLPNM consultants, or the ED, at any time in the process.	•
3.	That CLPNM provide more detailed, sufficient reasons for its initial application assessments and for the results of the Clinical Competency assessment;	The Guidebook that is being developed will include detailed information relating to the reasons for every step of the application and assessment process. In addition, information regarding the need for the CCA will be included in the Guidebook. CLPNM is currently reviewing and revising communication templates to ensure that all correspondence to applicants clearly articulates decisions and reasons for each step in the credential assessment process. This would include the reasons why an applicant would be required to undergo a CCA and the results of the CCA. As stated in 1. K. above, CLPNM is working with ACC to release more information surrounding the CCA as a way to provide more detailed, sufficient and clear reasons for CCA results.	Nov 2013
4.	That CLPNM give greater weight to qualifications evident in an applicant's work experience;	As all eligible applicants must graduate from a nursing education program, CLPNM currently looks at the educational background and work experience in combination, in order to assess the applicant's level of competency within the scope of practice for LPNs in Manitoba. Assessing work experience is critical to ensure safe practice and to protect the public. CLPNM reviews all appropriate health care related experiences of applicants who have graduated from a nursing education program. CLPNM respects and appreciates the nursing education and diverse experiences of IEN applicants. As protection of the public is always at the forefront, we are encouraged by the newly developed and revised CCA and PNQR and feel that as the pilot program progresses and is evaluated and validated, the qualifications that are evident in work experience may be afforded more weight in the credential assessment process.	Nov 2013
5.	That CLPNM place a moratorium on the new, higher English and French language proficiency levels until such time as better research can be produced that warrants increasing the requirements and that CLPNM commit to resolve this issue;	As there is a great need for nursing regulators across Canada to collaborate to provide fair and consistent processes for the recognition of foreign qualifications, the harmonization of language proficiency levels across the country was an important step towards a National Nursing Assessment Service for IENs. In the absence of recent longitudinal studies on language proficiency and communicative competence relative to Canadian nursing, the CLPNM is reluctant to place a moratorium on the new language proficiency levels. In the absence of funds to conduct a longitudinal study of language proficiency requirements, the harmonized scores help to lay a foundation for consistent credential assessment processes for IENs wishing to practice in Canada. The harmonization also supports labour mobility for LPNs across the country. The CLPNM is in full agreement that language proficiency is a complex matter and that there are many variables that can impact an applicant's testing results. Over the last year, College consultants have been in communication with language experts in Manitoba, including CELBAN administrators, to garner a better understanding of language scores. We have received information regarding CELBAN listening scores of 9 versus 10 that have afforded the CLPNM with a better understanding. CLPNM is currently reviewing its policy and process around language proficiency to allow eligible applicants with a CELBAN listening score of 9 to continue with the assessment process, which would include a CCA and possibly communications course(s). CLPNM is willing to work collaboratively with the OMFC and other interested stakeholders in further research into the communication requirements for LPNs in Canada.	
6.	That CLPNM undertake a review of the various elements of its assessment process to ensure a systematic, efficient process and give consideration to establishing alternative paths to registration in circumstance where the PNQR Bridging Program is not fully required.	As the PNQR is in a pilot phase, it is subject to a full evaluation as well as ongoing evaluation. As the PNQR pilot continues to operate, CLPNM will continue to assess the various elements of the entire assessment process to ensure the pathway to registration is efficient while keeping the protection of the public at the foreground. Currently, the CLPNM does offer alternative pathways to registration dependent upon the applicant's unique circumstances and experiences. Not all applicants require the CCA if their paper based assessment clearly and completely indicates education and relatively recent experience that is equivalent to the competencies of an LPN in Manitoba. Furthermore, not all applicants undergoing the CCA require the PNQR. For those applicants that do require additional education or practical skill development, the PNQR is customized to ensure the individual is receiving only the necessary training. Most often, IENs are referred to one or two parts of the PNQR, and	Jan 2014

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	frequently request permission to attend all sessions to solidify their current knowledge.	