



# **OMFC REGISTRATION REVIEW**

**Manitoba Pharmaceutical Association (MPhA)  
Final Registration Review Report (2012)**

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OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER



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## Introduction

This Final Registration Review Report presents the results of the Office of the Manitoba Fairness Commissioner's (OMFC) registration review with the Manitoba Pharmaceutical Association (MPhA) as of July 2012.

Registration reviews are conducted as part of the Fairness Commissioner's mandate to review the registration practices of regulatory bodies subject to *The Fair Registration Practices in Regulated Professions Act (Act)*.

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations to improve compliance. Two senses of compliance are at work in the legislation. First and foremost, it refers to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants. Secondly, it refers to the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that a registration review for any given regulator is to be undertaken at times specified by the Fairness Commissioner. It also stipulates that the content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

The OMFC's review process culminates in a Final Registration Review Report, complete with an Action Plan from the regulator. This report is a public document submitted to the Province's Minister of Immigration and Multiculturalism and posted on the OMFC's website.

The OMFC undertook a registration review with the MPhA between April and July of 2012 (see appendices A & B). Several meetings were involved, documentation was gathered and reviewed, field work was conducted and the MPhA provided an Action Plan in response to the Fairness Commissioner's recommendations. The MPhA's Action Plan, as well as the OMFC'S review findings and the Fairness Commissioner's recommendations follow throughout this report.






## Registration Review Process

The OMFC's multi-step review process has several key phases: agreeing to a review schedule, documenting and understanding, evaluating and drafting the findings and recommendations, achieving an action plan to move things forward. The process is designed to support meaningful reviews that concretely identify fairness issues and lead to progressive change.

### The Fairness Standard and Criteria Document

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For the purposes of the 2012 registration review cycle, regulatory practice is evaluated against a single, broad fairness standard: ***Dedicated and fair practices are applied for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure their effectiveness.*** In the Fairness Standard and Criteria Document, this fairness standard is defined by 14 elements, each further differentiated into one or more criteria.

For each criterion in the 'Fairness Standard and Criteria Document', green, yellow, and red check marks --    -- designate whether evidence is found indicating compliance, needs improvement, or non-compliance. Practices identified as needing improvement or non-compliant --  or  -- are followed by an analysis that explains the finding.

### Recommendations, Action Plan & Compliance Statement

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The Fairness Commissioner makes recommendations based on a consideration of the issues of non-compliance and areas that show opportunity for improvement. These are identified and explained in the 'Fairness Standard and Criteria Document' completed for the regulator.

The action plan, in turn, is drafted by regulators to respond to Fairness Commissioner's recommendations. For each of the Fairness Commissioner's recommendations, regulators reply with a plan to address the concern as well as a timeline for the execution of the plan. Regulators are given opportunity to remark upon any recommendation made by the Fairness Commissioner.

Finally, the Fairness Commissioner's Compliance Statement provides comment on the suitability of the regulator's Action Plan and the overall compliance of the regulator's registration practice.

### OMFC Support

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Addressing problematic practice can pose considerable challenges for regulators. No remedy may be readily at hand; third-parties may be involved; resources and expertise may be wanting. In these circumstances, the OMFC is committed to working with regulators to support and assist the development of innovative solutions and better practice.

## The Profession of Pharmacy in Manitoba

Pharmacists are responsible for medication therapy management of patients and for the safe and legal distribution of prescription and non-prescription drugs to patients and within the healthcare system. This involves advising patients, as well as physicians and other health practitioners, on the selection, dosages, interactions, and side effects of medications. Monitoring the safe and effective use of medication for patients distinguishes the Canadian model of pharmacy practice from many other regions in the world where manufacturing, compounding and dispensing of medication is the primary role.

In Canada, we have seen movement towards a collaborative patient-centred model of care that has been shown to improve patient safety and health outcomes. This has escalated the demand for highly-trained pharmacists with expertise in medication therapy management to communicate and work effectively with patients and other healthcare providers to improve patient health outcomes.

Although not currently the case in Manitoba, in many provinces the demand for pharmacists exceeds the graduation capacity of Pharmacy Faculties of Canadian Universities.

In the early 2000s, the MPhA and the Province developed the “Prescription for Learning: Communication Skills for the Practice of Pharmacy” program. A real benefit for IPGs, this 50 hour program provided people professional workplace orientation and communication training.

## Overview of MPhA's Assessment and Registration Process

The MPhA currently operates under the authority of The Pharmaceutical Act (C.C.S.M. c. P60) and the Pharmaceutical Regulation (56/92). In order to practice and use the title of pharmacist in Manitoba, individuals must be licensed by the Manitoba Pharmaceutical Association (MPhA).

### Qualifications

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Principal qualifications required for registration as pharmacist include possessing an approved four-year degree in pharmacy, successfully completing The Pharmacy Examining Board of Canada's (PEBC) Qualifying Exam, demonstrating language proficiency in English or French, successfully completing an internship in Manitoba and passing the MPhA's Jurisprudence Exam. The PEBC Qualifying Exam is a two-part exam of which Part I is composed of a multiple choice exam assessing the applicant's competency at entry to practice and Part II is an Objective Structured Clinical Exam (OSCE). International Pharmaceutical Graduates (IPGs) must possess educational degrees substantively equivalent to the Canadian standard and must, in addition to the above, pass the PEBC's Evaluating Exam. As similar educational standards are mutually recognized between Canada and the United States, graduates of the Accreditation Council for Pharmacy Education (ACPE) accredited pharmacy programs are not required to write the Evaluating Exam.

### Assessment and Registration Process

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For IPGs, there are two main steps in the assessment and registration process, to wit:

1. Application is made to the PEBC for a credential assessment to determine eligibility to challenge the Evaluating Exam. Then, if successful, IPGs apply to write the PEBC's Qualifying Exam;
2. Upon certification from the PEBC, application is made to the MPhA. IPGs must then complete a 360 hour internship under the supervision of a preceptor approved by MPhA's Council and pass the MPhA's Jurisprudence Exam.

#### ***1. The Pharmacy Examining Board of Canada's (PEBC) Assessment and Certification Process***

Application to the PEBC requires the following documentation and fees:

- Notarized university degree and transcript directly submitted by the educational institution;
- Verification of previous registration and statement of good standing directly submitted by regulating authority. This requirement is waived in the case of recent graduates;
- \$530.00 Document Evaluation fee;
- Completed Evaluating Exam Application Form;

- \$515.00 Evaluating Exam fee.

The Evaluating Exam is a two-part, two half-day multiple choice exam that tests for general academic pharmaceutical knowledge and knowledge of Canadian pharmacy practice. The Evaluating Exam is offered twice a year and currently can be written in Winnipeg, other major centres across the country and London, England. Three attempts are permitted.

Successful completion of the Evaluating Exam establishes eligibility to challenge the PEBC's Qualifying Exam.

The PEBC Qualifying Exam assesses the individual's competence -- knowledge, skills and judgement -- to practise pharmacy safely and effectively in an "entry level" Canadian, pharmacist position. Two half-day multiple choice exams are followed by a full day OSCE based on a series of 7-minute simulations of common and critical practice situations.

Synchronized to occur a few months after the Evaluating Exam, the Qualifying Exam is held twice a year in the spring and fall throughout Canada. Locations for the OSCE are restricted in some areas; currently the OSCE can be challenged in Winnipeg only in the spring.

A completed application and exam fee of \$1,920.00 is required (Part I - \$400.00 + Part II OSCE - \$1,520.00). Three exam attempts are permitted. Passing both Part I and Part II of the Qualifying Exam results in a PEBC certificate recognized by Provincial regulators.

## ***2. The Manitoba Pharmaceutical Association's (MPHA) Assessment and Registration Process***

PEBC certified IPGs apply to the MPhA, completing an application form, paying a \$506.76 application fee and supplying the following documentation:

- Notarized passport size and style photograph;
- Notarized copy of birth certificate;
- Copy of PEBC Qualification Certificate and/or copy of letter from the PEBC confirming qualification;
- For second language applicants, English or French language proficiency assessment scores directly submitted from testing organizations that meet minimum proficiency requirements as determined by the National Association of Pharmacy Regulatory Authorities (NAPRA);
- Notarized copy of Canadian Citizenship or Permanent Resident Status;
- Verification of previous registration and statement of good standing directly submitted from regulating authority or a directly submitted statement from the PEBC attesting to this documentation. This requirement is waived in the case of recent graduates;
- Criminal records check from a Canadian police service.

The MPhA's Registrar and Board of Examiners reviews and approves applications for registration.

Approved applicants must successfully complete a 360-hour internship with a



preceptor approved by the MPhA's Council. It is the responsibility of the applicant to secure a preceptor. The internship must be completed in 9 – 15 weeks and involves three preceptor assessments based on the NAPRA's *Professional Competencies for Canadian Pharmacists at Entry to Practice*.

There is no employment requirement for the internship. Employed as a technician or assistant, many IPGs will arrange their internship with a preceptor with a return of service agreement to work as a pharmacist for a period after licensure.

After 120 hours of internship have been successfully served, applicants are eligible to write the MPhA's Jurisprudence Exam. The three-hour, multiple-format exam tests for legal and profession-specific knowledge about ethics, legislation, standards of practice and the role of pharmacists in Manitoba.

Once all the above requirements are met and with the approval of the MPhA's Board of Examiners, applicants pay a registration fee of \$868.58 and are licensed.

### Appeal Process

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**The MPhA's registration and assessment decisions – application, internship assessments, and jurisprudence exam – are subject to appeal. Appeals are heard by the MPhA's Council members, independent of the Board of Examiners and the registrar responsible for original registration and assessment decisions. For the Evaluating and Qualifying Exams, the PEBC provides the opportunity for re-scoring reviews and in circumstances of ill health, applicants can petition for no standing status.**

### Time and Cost

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**The time and cost for IPGs to be assessed and register as a pharmacist varies depending on the circumstance of the applicant.**

**For an IPG who is able to collect and provide all the required documents, whose credentials qualify them for assessment, and who passes upon first challenge PEBC and MPhA exams, the entire process will take a minimum range of 12-18 months. This minimal range involves approximately 9 -15 months to obtain a PEBC certificate and 3 months to complete the MPhA's licensing requirements.**

**The direct costs for both the PEBC and MPhA examinations and requirements will total approximately \$4, 340.00, including the final registration fee. There may be associated costs providing documentation, language proficiency testing and preparing for and taking exams.**

**These timeframes and costs represent best case scenarios. The PEBC's bi-annual, fixed date exams and application windows mean documentation delays and failed exam attempts can quickly add 6 months to the process. Securing an internship may pose a challenge and will be dependent on preceptor availability.**

# Registration Review Findings

## Summary of Findings

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The MPhA is committed to the fair assessment and recognition of International Pharmacy Graduates (IPGs). In a profession where patient and public safety issues loom large and the expertise required by practitioners is evolving rapidly, the MPhA and PEBC subject IPGs to an extensive, rigorous assessment process involving credential assessment, multiple exams, objective structured clinical exam and internship.

Key findings from the MPhA's registration review are listed below. These findings cover the range of fairness issues as defined by the Fairness Standard and Criteria document and roughly follow the order of this document (see pp. 10-22).

### *A note on Third Parties*

Following *The Fair Registration Practices in Regulated Professions Act* (Act), the role of any third party in the assessment and registration process is evaluated as part of a registration review. Regulators subject to the Act are held responsible for the third parties they employ and must take reasonable measure to ensure fair practice. Any recommendation from the Fairness Commissioner that speaks to compliance issues with third party practice is directed to the regulator as responsible for the service it employs.

The Pharmacy Examining Board of Canada (PEBC) plays a large role in the MPhA's assessment process for IPGs. This is reflected in many of the review findings and some of the recommendations of this report. The PEBC serves Canada's provincial regulators and is responsible for credential assessment, the Evaluating Exam and the Qualifying Exam. Along with other provincial regulators, the MPhA has a seat on the PEBC Board.

- MPhA's website presents the registration and assessment process in clear, straightforward steps.
- PEBC's website also provides straightforward, step-by-step information about its assessments and its certification role as the first step in the registration process.
- Extensive information is provided by the PEBC about documentation requirements, the credential assessment, the Evaluating and Qualifying exams. The format, content and grading of the exams is described; timelines and key dates are clearly articulated.
- The MPhA has recently revised and updated an 'Internship Manual' for applicants and preceptors. The manual provides applicants comprehensive information about internship requirements and the assessment process. The manual is available on MPhA's website.
- With funding from the Federal Foreign Credential Recognition Program, the National Association of Pharmacy Regulatory Authorities' (NAPRA)

IPG Gateway to Canada Project will soon establish a plain language, one-stop, single source website with a variety of supports for IPGs. Key features will include readiness and self-assessment tools and a national IPG database.

- Practice standards are identified and regularly reviewed. NAPRA's extensive entry-to-practice document, "Professional Competencies for Canadian Pharmacists at Entry to Practice", lays the foundation for rational regulation. Technical skills and knowledge are articulated in a manner that supports the educational standard, PEBC's exams, and the MPhA's internship assessment.
- International educational credentials are assessed and recognized against a well-defined Canadian standard. Applicants with degrees from ACPE-accredited, U.S. pharmacy programs are fully recognized and can directly challenge the PEBC Qualifying Exam. PEBC document evaluation staff are trained in house and follow standardized policy and guidelines.
- Applicants must arrange for third-party, direct submission of previous registration verification twice, once for PEBC's credential assessment and then again to the MPhA. For a \$50.00 fee, applicants can arrange for the PEBC to forward their documentation to the MPhA.
- Alternative documentation is considered by both the MPhA and the PEBC for applicants that cannot, with good reason, supply required documentation. Little information is provided about alternative documentation possibilities.
- The language demands of the pharmacy profession were benchmarked in Manitoba by Red River College's Language Training Centre in 2003 and more recently in Ontario by the Centre of Canadian Language Benchmarks in 2010/2011. Language proficiency requirements are commensurate with the levels benchmarked in the field. A dedicated language assessment for IPGs is presently under consideration by the NAPRA.
- PEBC's exams are subject to extensive psychometric review and scrutiny. Quality assurance protocols are in place for the PEBC exams; assessors are trained and a Chief Examiner oversees the assessments.
- The MPhA has taken several measures to ensure the integrity of internship assessments: the 'Internship Manual' provides assessment rubrics and guidelines; a 'Preceptor Training Workshop for Pharmacists' has been developed with the University of Manitoba's Faculty of Pharmacy; a preceptor training video will be available shortly on the MPhA's website.
- Customized written reasons are provided by the PEBC for the assessment of academic credentials. Results for the Evaluating Exam and QE are broken down into broad subject matter areas and contrasted against average score results.

- Transparent and detailed evaluations are provided for the MPhA's internship assessments.
- Partial credit is available for parts of the PEBC Qualifying Exam so that applicants only have to re-take the part in which they were unsuccessful.
- IPGs have the opportunity to appeal internship assessments, the results of the MPhA Jurisprudence Exam. For the Evaluating and Qualifying Exams the PEBC also provides re-scoring reviews and in the circumstance of ill health, applicants can petition for no-standing status. Both the MPhA and the PEBC are not-for-profit organizations. Fees are based on cost recovery.
- The MPhA's assessment timelines are very prompt, the PEBC's are more conventional, but reasonable. Due to the extensive, multiple assessments involved, the registration and assessment process as a whole is somewhat extended. The minimal range faced by IPGs is an 12-18 month process.

### Commendable Practices

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A number of the MPhA's assessment and registration practices deserve to be recognized as exemplary, fair practices. Most of these will have already been described above or in other areas of this report, but the most significant bear repeating.

- The MPhA benefits from NAPRA's well-defined standards and competency documents. These documents lay the foundation for rational regulation and assessment.
- The MPhA's 'Internship Manual' provides IPGs comprehensive information and supports transparent assessment practices. The 'Preceptor Training Video' is a best practice.
- Strong measures are taken by the PEBC to ensure valid and reliable assessments for the credential assessment, Evaluating Exam and Qualifying Exam. To mention some of the more significant examples: the subject matter of the exams is clearly linked to practice standards; the exams are psychometrically reviewed and "pre-tested" by practicing pharmacists; assessors for the OSCE are trained and a "Quality Assurance Panel" reviews each assessment to ensure the fair and accurate assessment of performance for each applicant undergoing the OSCE.
- The NAPRA's IPG Gateway to Canada Project promises an innovative and progressive resource for IPGs. Work with Federal Foreign Credential Recognition Program has also resulted in the NAPRA's consideration and commitment to a number of beneficial projects focused on the more efficient assessment of IPGs.

## Fairness Standard & Criteria Document – MPhA Review Findings

<b>Standard: Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.</b>					
Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	1. Qualification requirements and the criteria used to assess qualifications.		✓		<p>Qualification requirements -- academic training and the Pharmacy Examining Board of Canada's (PEBC) national exams are for the most part clear and comprehensive.</p> <p>Clear, comprehensive information is also provided regarding the MPhA's Internship requirements and Jurisprudence Exam in the MPhA's "Internship Manual". The manual is currently available on the MPhA's website.</p> <p>A few aspects concerning the qualification requirements are somewhat confusing. First, while we can plainly see that applicants must possess academic credentials substantively equivalent to the Canadian/American standard, the details about the standard are not as easily discerned – specifically it is hard to determine the length and character of the educational program required. The National Association of Pharmacy Regulatory Authorities (NAPRA or National Body) Professional Competencies document stipulates an accredited baccalaureate pharmacy degree or its substantive equivalent.</p> <p>It is anticipated that this issue will be resolved through the National Body's promising IPG Gateway to Canada Project. With funding from the federal Foreign Credential Recognition Program, the project aims to establish a plain language, one-stop, single source website with a variety of self-assessment tools. This will include information that will support education credential review and gap identification. Applications will feed into a national shared database which will collect general information on IPGs and be accessible to provincial regulators.</p>
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	2. Documentation requirements.	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	3. Fees and fee payment options.	✓			
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	4. A realistic sense and range of the full costs involved in the process, including common associated costs.		✓		Both with respect to the MPhA and the PEBC, assessment and registration fees are clearly presented, but no information is provided about common associated costs or about the likely total cost-range of registration. The IPG Gateway to Canada Project currently under development will provide this information.
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	5. Financial support opportunities.		✓		No information is provided about the possibility about financial support opportunities. The proposed IPG Gateway to Canada Project will provide this information. This will include, for instance, information about Manitoba's Credential Recognition Program.
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	6. Timelines and key dates.	✓			
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	7. A realistic sense and time range of how long the entire process often takes.		✓		No information is provided that presents a realistic time range for the full assessment and registration process. The proposed IPG Gateway to Canada Project will provide this information.
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	8. Step-by-step, easy-to-navigate path of the registration process.	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	9. Information provided about opportunities for general and occupation-specific upgrading.		✓		<p>IPG's Gateway to Canada project currently under development will have an information package dedicated to educational upgrading opportunities available across the country, as well as a self-assessment tool and learning plan support.</p> <p>To fulfill the MPhA's internship requirement, IPGs are responsible to secure a preceptor approved by MPhA's Council. Many newly immigrated IPGs will have little social capital and little sense of the opportunities in Manitoba's pharmacy community that will enable them to engage an internship. The MPhA currently offers limited, informal advice to IPGs about internship. Providing more detailed and structured information about potential preceptor and internship possibilities would be a significant benefit.</p>
2. Standards of practice are identified and periodically reviewed.		✓			
3. Required qualifications are relevant and necessary for competent professional practice.		✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
4. Documentation requirements are reasonable. Alternative documentation opportunities are available and explained to applicants	1. Difficult-to-provide documents – e.g. originals, syllabus – are warranted.		✓		<p>Both the MPhA and PEBC require a letter of standing from the IPGs previous regulating authority (waived in the circumstance of recent graduates). The MPhA, the second step in the registration process, will also accept a statement directly from the first step, PEBC that the candidate has satisfied this requirement. In this circumstance, applicants must arrange for a directly submitted PEBC statement. As supplying previous registration documentation can be challenging for IPGs, this is an important accommodation by the MPhA. Still, fully synchronizing this requirement between the MPhA and PEBC, where PEBC certification would be recognized by the MPhA as having met this documentation requirement, would further lessen the documentation demand for IPGs.</p> <p>The PEBC applies a 6 month expiration date to previous registration documentation. Given the challenges and delays often experienced by IPGs securing third-party documentation from abroad, the PEBC's 6 month window may be too restrictive; resulting in IPGs having to go to the time and expense of re-supplying this documentation. Expiration dating should not be applied without a consideration of the applicant's circumstance: it is warranted in cases where applicants continue to practice abroad, but much less so for those who have immigrated and have not been practicing subsequent to the date of the initial documentation. Pre-migration applications, lengthy language upgrading ... a number of legitimate reasons may account for an applicant's previous registration documentation exceeding a 6 month expiration window.</p>
4. Documentation requirements are reasonable. Alternative documentation opportunities are available and explained to applicants	2. Alternative documentation opportunities are available and clearly explained.		✓		<p>Both the MPhA and PEBC will consider alternative documentation in circumstances where an applicant, with good reason, cannot provide standard documents. However, neither body provides sufficient information about the opportunity for alternative documentation or the procedure and policies involved. The PEBC does provide information about alternative documentation concerning their identification requirements, but no information appears with respect to educational credentials or previous registration.</p>



**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
4. Documentation requirements are reasonable. Alternative documentation opportunities are available and explained to applicants	3. Criminal records policy is warranted and clearly explained.	✓			
5. Any third party assessments in the registration process are transparent, objective, impartial and fair.	1. Applicants are provided clear, complete and accurate information about the role of third party assessments in the registration process.	✓			
5. Any third party assessments in the registration process are transparent, objective, impartial and fair.	2. Measures are in place to ensure third party assessment policy and practice is fair.	✓			
5. Any third party assessments in the registration process are transparent, objective, impartial and fair.	3. Third party assessment decisions are subject to appeal.		✓		<p>The PEBC's eligibility assessment for the Evaluating Exam and Qualifying Exam are reported by the PEBC as being subject to full appeal. In addition, the Evaluating and Qualifying Exams are subject to re-scoring: "This hand-scoring is only to confirm correct data entry and tabulation of scores". Candidates may also make an application for "No Standing" status within 7 calendar days following the exam for serious illness or emergency situations".</p> <p>The opportunity for rescoring and no standing petition is clearly presented in the PEBC's website. However, the opportunity to formally appeal the PEBC's eligibility assessment, Evaluating Exam and Qualifying Exam is not clearly presented on the PEBC's website, nor does any formal appeal information accompany the PEBC's assessment/exam results. Moreover, the opportunity for full appeal of the Evaluating and Qualifying Exams appears to be expressly denied on the PEBC website: "The content, methodology, standards, or assessment criteria ... (for either exam)... are not subject to review or appeal by unsuccessful candidates or their agents". No information is provided about appealing exam results beyond rescoring and no-standing petitions.</p>

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
6. Assessment of qualifications is transparent, objective, impartial and fair.	1. Valid and reliable methods of assessment are employed for internationally educated applicants.	✓			
6. Assessment of qualifications is transparent, objective, impartial and fair.	2. Assessment methods and tools are subject to psychometric scrutiny and cultural review.	✓			
6. Assessment of qualifications is transparent, objective, impartial and fair.	3. Multiple assessment methods are available. Applicants have the opportunity to demonstrate competence.	✓			
6. Assessment of qualifications is transparent, objective, impartial and fair.	4. Knowledge and skills acquired through work experience are assessed, including international work experience.	✓			
6. Assessment of qualifications is transparent, objective, impartial and fair.	5. International educational credentials are subject to a reasonable, valid equivalency assessment: reasonable measure has been taken to acquire an informed understanding of the content of international educational programs and their equivalence to Canadian programs.	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
6. Assessment of qualifications is transparent, objective, impartial and fair.	6. The regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience.	✓			
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	1. Training for the assessment academic qualifications.	✓			
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	2. Training for the assessment of work experience	✓			
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	3. Appeal training	✓			
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	4. Cross-cultural training.	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
8. English and French language proficiency requirements for registration and professional practice are reasonable.	1. French or English language proficiency levels are identified and based on the language demands of the profession.	✓			
8. English and French language proficiency requirements for registration and professional practice are reasonable.	2. Level of language proficiency identified at key points in the registration process – e.g., entry to practice vs. application or entry to gap training.	✓			
8. English and French language proficiency requirements for registration and professional practice are reasonable.	3. The identification of the nature and type of communicative demands for professional practice and the assessment process		✓		The profession of pharmacy has recently been benchmarked. Information about the language proficiency demands of the profession will be part of the new IPG Gateway project under development.
8. English and French language proficiency requirements for registration and professional practice are reasonable.	4. The appropriate use of language proficiency tests, expiration dating and test-scores.		✓		Without exception, the MPhA applies 2 year expiration dating to language test results. Expiration dating is applied to test result because language proficiency is subject to a 'use it or lose it' phenomenon and 2 years is the convention among the various language tests accepted by the MPhA. Expiration dating is warranted in circumstances where applicants are not working or living in an English or French speaking environment. For applicants who have immigrated and are working in an English or French speaking environments, a 'use it and win it' phenomenon is more likely at hand and the rationale for requiring a re-test loses much of its force.
8. English and French language proficiency requirements for registration and professional practice are reasonable.	5. A variety of English language test are recognized	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
9. Assessment and registration process is relationally fair.	1. Written reasons accompany assessment results.	✓			
9. Assessment and registration process is relationally fair.	2. Detailed feedback is provided about qualification gaps.	✓			Sufficient written reasons are provided by both the MPhA and PEBC for all of the assessments in the registration process. In particular, the assessment results for the MPhA's internship and the PEBC's credential assessment and Qualifying Exam are very helpful. The PEBC's results letters for the Evaluating Exam identify basic subject matter areas that support future study focus. However, the results for the Evaluating Exam are prefaced by comparison quarter numbers that tell applicants how poorly they scored relative to those applicants who also failed: top quarter, second quarter and so forth. Few applicants will easily grasp or appreciate this particular quantification of their results. In this regard, the visual, graphic representation of how individuals scored relative to the group, provided for the Qualifying exam, is altogether more intuitive. We suggest the PEBC adopt this model for its Evaluating Exam result letters.
9. Assessment and registration process is relationally fair.	3. Applicants have the opportunity to discuss assessment and registration decisions of concern.	✓			
9. Assessment and registration process is relationally fair.	4. Applicants without appropriate qualifications receive advice and information about alternative careers.	✓			
10. Registration process allows for different levels of recognition.	1. Opportunity for restricted or conditional license and supervised practice.	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
10. Registration process allows for different levels of recognition.	2. Re-assessment only required in areas where competence has not been demonstrated.	✓			
10. Registration process allows for different levels of recognition.	3. Time-frames for re-assessment are consistent with currency of practice standards.				
11. A fair appeal or review process is available.	1. All assessment and registration decisions that deny or condition registration are subject to appeal	✓			
11. A fair appeal or review process is available.	2. Appeal or review committee members are independent from those responsible for the original decision	✓			
11. A fair appeal or review process is available.	3. Timely hearings and appeal decisions	✓			
11. A fair appeal or review process is available.	4. Detailed, written reasons are provided to appellants for unfavorable decisions.	✓			
11. A fair appeal or review process is available.	5. Applicants are advised of their right to appeal.	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
11. A fair appeal or review process is available.	6. Appeal information accompanies any assessment and registration decision subject to appeal.	✓			
12. Legal exceptions notwithstanding, applicants have full and timely access to their assessment results and records associated with registration.	1. There is a process under which requests for records are considered. Fees for access to records are reasonable and do not exceed cost recovery.	✓			
12. Legal exceptions notwithstanding, applicants have full and timely access to their assessment results and records associated with registration.	2. Applicants are informed of their access to records and the process for requesting records.		✓		The MPhA has an informal, no-fee process. Applicants have access to records upon request. No information is provided about access to records.
13. Fees involved in the assessment and registration process are reasonable.	1. Fees do not exceed cost recovery.	✓			
14. Assessment and registration process is timely.	1. Reasonable measure is taken to ensure the prompt processing of applications and assessments.	✓			
14. Assessment and registration process is timely.	2. Communication with applicants is timely and systematic.	✓			

**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
14. Assessment and registration process is timely.	3. Assessment and registration process is structured efficiently and minimizes unnecessary delays.		V		<p>IPGs face a minimal range of 12 -18 months for the assessment and registration process. This timeframe accounts for both assessment steps with the PEBC and MPhA. Fixed date exams and applications windows mean that exam failures or failing to provide required documentation can quickly add another 6 months to the process.</p> <p>The two step assessment and registration process, involving first the PEBC and then the MPhA, is quite comprehensive with thorough credential assessment, multiple exams, OSCE and an internship. In a profession where significant differences in practice are found outside of Canada, public safety issues loom large and a high degree of expertise is needed, a rigorous assessment process is justified.</p> <p>Still there remains a need to review the relevance of the Evaluating Exam as it pertains to the efficiency of this assessment process as a whole. Applicants must undergo both an extensive credential assessment and the Evaluating Exam to determine whether they have completed an appropriate program of study and possess knowledge similar to their Canadian graduate counterparts. Due to the similarity of standards, applicants from ACPE-accredited academic programs are not required to take the exam and proceed directly to the Qualifying Exam.</p> <p>Assessing the academic knowledge of IPGs mid-career maybe of questionable relevance, if the expectation is that IPGs are to perform like recent Canadian Graduates as opposed to competent mid-career Canadian Pharmacists. Ideally, IPGs should be assessed in a way that compares their knowledge, which at mid-career is richer in experience-based knowledge than textbook academics, to the knowledge of practicing Canadian pharmacists in the field. In this respect, the purpose of the Qualifying Exam appears to be more directly relevant as it targets entry-to-practice competencies and knowledge.</p>



**Standard:** *Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.*

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Improvement Needs	Non-compliant	
					<p>The OMFC understands that prior to 1987, IPGs, upon successful credential assessment, were allowed to directly challenge the Qualifying Exams. IPGs with gaps identified in their academic programs relative to the Canadian standard were required to take upgrading coursework and faced a longer, more expensive process. Moreover, testing applicants' academic knowledge with an exam is a more direct, valid measure of knowledge. Finally we note the PEBC is currently working to implement a computerized, electronic Evaluating Exam that could be offered more frequently and pre-migration, at overseas locations.</p> <p>Consideration should be given to providing IPGs more flexible, alternative routes to challenge the Qualifying Exams. Those with academic programs sufficiently equivalent to the Canadian/North American standard should, like U.S. applicants, have the Evaluating Exam waived. Data from the exam could be collected and analyzed to support waiving the exam for applicants educated from areas in the world where applicants have been consistently successful. Applicants with gaps in their academic training could be given opportunity to pursue academic upgrading in lieu of the Evaluating Exam.</p>

## Fairness Commissioner's Recommendations

As a result of the OMFC's registration review of the Manitoba Pharmaceutical Association and to ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends:

1. *That* with regard to the assessment and registration information:
  - a. The MPhA make clear in its registration information the possibility of alternative documentation and the process involved;
  - b. The MPhA make clear in its registration information an applicant's access to records and the procedure whereby records are accessed;
  - c. The MPhA contact the PEBC and request:
    - i. *That* PEBC information make clear the opportunity for alternative documentation and the process involved;
    - ii. *That* PEBC information make clear an applicant's access to records and the procedure whereby records can be accessed;
2. *That* the MPhA's expiration policies for language tests be reconsidered in cases where the applicant, subsequent to the language test, has lived, worked or studied in an English or French environment;
3. *That* the MPhA better streamline its documentation requirements for IPGs by recognizing the PEBC's documentation assessment with regard to previous registration, no longer requiring IPGs to arrange for the PEBC to submit this documentation or seeking it again from the applicant's previous regulator;
4. *That* the MPhA accommodate IPGs seeking internships by co-ordinating and providing information about internship opportunities;
5. *That* the MPhA contact the PEBC to ensure that the PEBC's eligibility assessment, Evaluating Exam and Qualifying Exam are subject to full and fair appeal and to request that complete and accurate appeal information be provided on the PEBC's website, and that this information accompany result letters;
6. *That* the MPhA contact the PEBC to request the 6 month expiration dating applied to previous registration documentation be extended for applicants whose circumstances so warrant;
7. *That* the MPhA contact the PEBC to request both a review of the relevance and necessity of the Evaluating Exam and a consideration of alternative eligibility routes for IPGs to challenge the Qualifying Exams.

## **MPhA's Action Plan**

In response to the Fairness Commissioner's Recommendations, the Manitoba Pharmaceutical Association proposed the following action plan as of July 2012. The plan is reprinted in its entirety under the 'MPhA's Action Plan' column in the table below.


The MPhA's Action Plan will form the basis of its relationship with the OMFC moving forward. Actions are monitored by the OMFC and will be tracked in the 'Completion Date' box of the Action Plan template as they come to fruition. As the report will be available online, this allows any interested party to see the progress to date.

OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>1. With regard to the assessment and registration information:</p> <p>a. The MPhA make clear in its registration information the possibility of alternative documentation and the process involved;</p> <p>b. The MPhA make clear in its registration information an applicant's access to records and the procedure whereby records are accessed;</p> <p>c. The MPhA contact the PEBC and request:</p>	<p>The MPhA will make clear in its registration information posted on the MPhA website and provided by email the possibility of alternative documentation and the process involved.</p> <p>The MPhA will make clear in its registration information posted on the MPhA website and provided by email an applicant's access to records and the procedure whereby records are accessed.</p>	<p>✓</p> <p>✓</p>			


OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>i. That PEBC information make clear the opportunity for alternative documentation and the process involved;</p>	<p>PEBC Document Evaluation processes are standardized yet flexible to permit verification alternatives if there are circumstances such as war, strife or other reasons that prohibit the candidate from obtaining academic or other pertinent documentation. Candidates who report difficulties in getting their documentation are advised by the Document Evaluation staff regarding the following alternative process:</p> <ul style="list-style-type: none"> <li>• Candidates must make a statutory declaration stating why they are unable to provide the required documents; and,</li> <li>• The PEBC requires certified statements from three Canadian or US-licensed pharmacists, stating the length of time they have known the candidate and confirming that the candidate graduated from their same school of study. In some instances, certified statements from one of their professors have been accepted.</li> </ul> <p>The opportunity for alternative documentation and the process involved is currently provided only as it relates to identification on the PEBC website <a href="#">here</a> e.g., see section "If you are unable to submit the required identification". The MPhA will request that PEBC expand the information on its website regarding alternative documentation and the process involved.</p>	<p>✓</p>			

OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
ii. <i>That</i> PEBC information make clear an applicant's access to records and the procedure whereby records can be accessed;	The MPhA will request that PEBC make clear in its information posted on its website an applicant's access to records and the procedure whereby records can be accessed.	✓			
<b>Regulator's Comments:</b>					

OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
2. <i>That</i> the MPhA's expiration policies for language tests be reconsidered in cases where the applicant, subsequent to the language test, has lived, worked or studied in an English or French environment;	In preparation, the MPhA requests that the OMFC provide evidence to support the notion that an applicant's language proficiency will improve based on the length of time that the applicant has lived, worked or studied in an English or French environment and language proficiency assessment tools used by other regulatory bodies in these situations. The MPhA will then direct the Board of Examiners to reconsider the MPhA's expiration policies for language tests in cases where the applicant, subsequent to the language test, has lived, worked or studied in an English or French environment.		✓		
<b>Regulator's Comments:</b>					


OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>3. <i>That</i> the MPhA better streamline its documentation requirements for IPGs by recognizing the PEBC's documentation assessment with regard to previous registration, no longer requiring IPGs to arrange for the PEBC to submit this documentation or seeking it again from the applicant's previous regulator;</p>	<p>The MPhA currently recognizes PEBC's documentation assessment with regard to previous registration and will direct the Board of Examiners to consider no longer requiring IPGs to arrange for the PEBC to submit this documentation. However, in situations where an applicant has returned to his country of origin to practice for a period of time during the PEBC registration process, a current letter of standing from the applicant's regulator will be required.</p> <p>In addition, with introduction of NAPRA's IPG Gateway to Canada Project scheduled for spring 2013, applications and documentation will feed into a national shared database which will be accessible to all provincial pharmacy regulators.</p>				
<p><b>Regulator's Comments:</b></p>					



OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>4. That the MPhA accommodate IPGs seeking internships by co-ordinating and providing information about internship opportunities;</p>	<p>IPG applicants are responsible for securing a licensed practicing pharmacist willing to serve as their preceptor who is eligible to be approved by Council as a preceptor. Currently the MPhA does direct IPG applicants to the contact information listed in the Directory of Licensed Pharmacies to assist in securing a preceptor. In addition, the MPhA has provided training workshops for preceptors and plans to post an online version of this workshop on the MPhA website to encourage pharmacists to serve as preceptors.</p> <p>It is not within the mandate of the MPhA to provide employment opportunities for pharmacists and these services are offered by the advocacy groups for pharmacists in this province, the Canadian Society of Hospital Pharmacists-Manitoba Branch (CSHP-MB) and the Manitoba Society of Pharmacists (MSP). The MPhA is aware that at times when there is an opening for a pharmacist position at a pharmacy, pharmacists at this site may be more willing to serve as a preceptor for an applicant who agrees to continue to work at this pharmacy following licensing. The MPhA will therefore, also direct IPGs seeking preceptors and internship sites to the CSHP-MB and MSP for possible future employment opportunities. The MPhA will post this information on our website, provide links to the CSHP-MB and MSP websites and include this information in our communication to applicants about the internship program.</p>				
<p><b>Regulator's Comments:</b></p>					

OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>5. That the MPhA contact the PEBC to ensure that the PEBC's eligibility assessment, Evaluating Exam and Qualifying Exam are subject to full and fair appeal and to request that complete and accurate appeal information be provided on the PEBC's website, and that this information accompany result letters;</p>	<p>A structured PEBC appeal process is already in place and has been shared with the OMFC office. The PEBC has confirmed that any aspect of the PEBC examination process, including eligibility assessment for the Evaluating Exam and the Qualifying Exam, may be appealed using this process. The MPhA agrees to request the PEBC consider ways to make information regarding an applicant's ability to appeal the eligibility assessment for PEBC exams clearer by including this information on the PEBC website and in correspondence to applicants who have been unsuccessful in meeting the eligibility assessment.</p> <p>The MPhA has raised the issue with PEBC of applicants not being able to appeal the content of the Evaluating Exam and the Qualifying Exams. We have been informed by the PEBC that due to the nature of these high-stakes examinations for professional certification, the PEBC is not able to allow candidates to request a full review of their performance in an examination. Such a review would compromise the integrity and security of the examination content, as candidates would be allowed to revisit examination material and be exposed to correct answers or expected responses. This type of review would prohibit any exposed examination content from being used again on a future examination and thereby significantly increase costs associated with examination content development. The examination content of the PEBC Evaluating and Qualifying Examinations has undergone rigorous pre-testing, including psychometric analysis and is audited, to determine relevance and validity.</p> <p>The MPhA agrees to convene a joint meeting with the OMFC and PEBC to further discuss the limitations of this request and to raise this issue with the Deputy Minister of Health.</p>	<p>✓</p>			

OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p><b>Regulator's Comments:</b></p> <p>The MPhA understands the focus of the OMFC is to ensure that applicants should be able to appeal all registration processes including examinations. At the same time, the MPhA is clear in its understanding of the potential risk to patient safety that would result should the security of the PEBC examination content be breached. Although the MPhA cannot agree with this recommendation, we do agree to continue discussion on this issue to reach a better mutual understanding.</p>					
<p>6. <i>That</i> the MPhA contact the PEBC to request the 6 month expiration dating applied to previous registration documentation be extended for applicants whose circumstances so warrant;</p>	<p>The MPhA agrees to contact the PEBC to discuss possible options to the 6-month expiration dating applied to previous registration documentation for applicants whose circumstances so warrant. The MPhA will request the OMFC's assistance in providing best practice models in support of this recommendation that may be in use by other regulators of a health profession.</p>	<p>✓</p>			
<p><b>Regulator's Comments:</b></p>					

OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>7. The MPhA contact the PEBC to request both a review of the relevance and necessity of the Evaluating Exam and a consideration of alternative eligibility routes for IPGs to challenge the Qualifying Exams.</p>	<p>The PEBC Evaluating Exam is designed to determine if a candidate has the knowledge and skills comparable to a graduate from a CCAPP-accredited program. It evaluates the candidate's knowledge and skills in required areas of current pharmaceutical education and has been used by the PEBC since the late 1980's as a comparability determination tool for the educational preparation of all IPGs (with the exception of those educated in the US).</p> <p>Prior to 1987 IPGs were permitted to directly challenge the PEBC Qualifying Exam after validation in the Document Evaluation process, which included upgrading of any curricular deficiencies with Canadian university courses. However, the PEBC soon recognized that, while the Document Evaluation process could confirm the authenticity, legitimacy or existence of bona fide universities and pharmacy schools internationally, it could not provide a good qualitative or quantitative measure of the actual academic preparation in pharmacy (learning outcomes) attained by each IPG. The Evaluating Exam was therefore implemented to provide an efficient, yet comprehensive, objective and standardized approach to determining IPGs' preparedness to sit the Qualifying Exams.</p> <p>If the Evaluating Exam were not to be used, the Document Evaluation process would take considerably longer to complete in order to determine educational comparability and if potential deficiencies were identified in a pharmacy program, it would be necessary for the applicant to enrol in certain university pharmacy courses to upgrade their education. This approach would not only be considerably more time consuming but, also more costly for both the IPG applicant and the MPhA as the provincial regulatory body for licensing.</p>				

OMFC's Recommendation	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
	<p>The PEBC Evaluating Exam is considered a cost-effective approach to determining the educational preparation of IPGs by all provincial pharmacy regulatory authorities in Canada. As well, we all look forward to implementation of NAPRA's Gateway to Canada Project that will further assist IPGs, through the use of self-assessment tools, to prepare for registration and licensure in Canada.</p> <p>While the MPhA is willing to comply with the OMFC's recommendation to request the PEBC conduct a review of the relevance and necessity of the Evaluating Exam and consider alternative eligibility routes for IPGs to challenge the Qualifying Exams, it is our opinion that such actions have occurred repeatedly and on an on-going basis throughout the 40-year history of the PEBC. However, the MPhA will be willing to co-author a letter to the Minister of Health and the Minister of Education to explore the possibility of creating a centre of excellence in Manitoba for all professions to enable document evaluation and prior learning assessment to achieve the same goals currently being accomplished through the PEBC Evaluating Exam.</p>				
<b>Regulator's Comments:</b>					

## Fairness Commissioner's Statement of Compliance

The Manitoba Pharmaceutical Association's Action Plan is in many respects a progressive response to the recommendations resulting from the OMFC registration review. Many of these actions will support the fairer assessment and recognition of international pharmacy graduates (IPG) and are fully consistent with *The Fair Registration Practices in Regulated Professions Act*.

A number of the Association's assessment and registration practices are commendable. To mention some significant examples: the Association's 'Internship Manual' provides IPGs comprehensive information and supports transparent assessments. Important work has been done ensuring proper training for preceptors. As well, the Association has participated at the national level in the development of NAPRA's IPG Gateway to Canada Project, which promises a progressive resource for IPGs.

For a few of the recommendations that resulted from this review, the Association has conditioned their commitment to action upon further clarification and analysis from the OMFC. The Association has also expressed some reservation about one of the recommendations, but are still willing to continue to discuss the issue.

The Association's provisos are earnest and reflect the seriousness with which they approach their role. This includes the need for due diligence, co-operation with the OMFC and compliance with The Fair Registration Practices in Regulated Professions Act.

A theme that emerges from some of the recommendations rings a cautionary note. Beware losing sight of the forest for the trees. IPGs are subject to a rigorous, extensive documentation and assessment process, the pieces of which have been psychometrically well vetted. There remains a need to ensure these pieces and this system of documentation and assessment as a whole, are truly effective and efficient for mid-career IPGs.

I am encouraged by the Association's willingness to continue discussing and working on these issues. My hope is that the Association will look at solutions with the substantive equality lens brought to focus by the review. The OMFC is committed to working with the Association to provide any clarification, information and support that will be helpful.

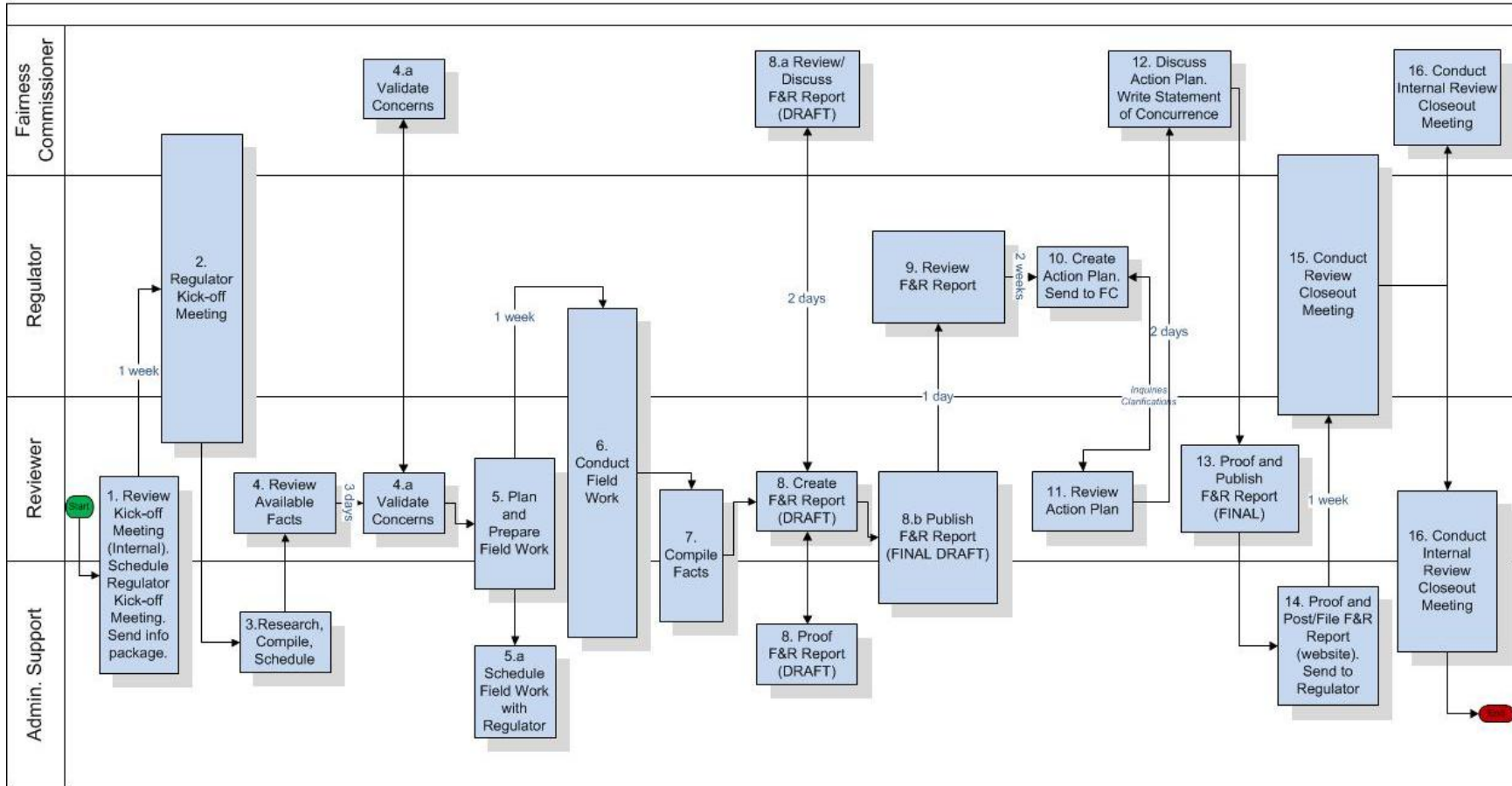
We truly appreciate the Association's co-operation, openness and diligence during the conduct of the registration review. I thank the Association's staff and management, as well as PEBC staff for their participation and hard work.



Ximena Munoz  
Manitoba Fairness Commissioner

# Appendix A

## OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER Registration Review Process



## Appendix B

<b>MPhA's Registration Review</b>		
<b>Activity</b>	<b>Description</b>	<b>Date</b>
<b>Block Meeting</b>	<ul style="list-style-type: none"> <li>• Meetings between OMFC, MPhA and other regulators in the block of reviews for this review period;</li> <li>• Registration review process presented;</li> <li>• Review schedule set;</li> <li>• Nature of required documentation explained and requested.</li> </ul>	<ul style="list-style-type: none"> <li>• April 3, 2012</li> </ul>
<b>Kick-Off Meeting</b>	<ul style="list-style-type: none"> <li>• Launch of MPhA's registration review;</li> <li>• Key decisions makers from regulator in attendance;</li> <li>• Collect requested documentation;</li> <li>• Fieldwork planned.</li> </ul>	<ul style="list-style-type: none"> <li>• April 25, 2012</li> </ul>
<b>Fieldwork</b>	<ul style="list-style-type: none"> <li>• Collect information otherwise unavailable through public information and policy documents;</li> <li>• Clarify information and acquire a more in-depth understanding of policy and practice.</li> </ul>	<ul style="list-style-type: none"> <li>• June 1, 2012</li> </ul>
<b>Findings and Recommendations Report</b>	<ul style="list-style-type: none"> <li>• MPhA receives a report with the review findings, the Fairness Commissioner's recommendations and a request for an Action Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• June 14, 2012</li> </ul>
<b>Action Plan</b>	<ul style="list-style-type: none"> <li>• MPhA's Action Plan submitted to OMFC.</li> </ul>	<ul style="list-style-type: none"> <li>• June 27, 2012</li> </ul>
<b>Final Registration Review Report</b>	<ul style="list-style-type: none"> <li>• Final report submitted to MPhA;</li> <li>• Report contains the review findings, the Fairness Commissioner's recommendations, MPhA's Action Plan, and the Fairness Commissioner's Compliance Statement</li> </ul>	<ul style="list-style-type: none"> <li>• July 12, 2012</li> </ul>
<b>Registration Review Closeout Meeting</b>	<ul style="list-style-type: none"> <li>• Discuss review results &amp; Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>• July 12, 2012</li> </ul>







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