



OMFC REGISTRATION REVIEW

**College of Dietitians of Manitoba
Final Registration Review Report (2013)**

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 College of Dietitians of Manitoba (CDM) as of March 2013.

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. Compliance refers first and foremost to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants. It also 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. 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.

Review Process

For the purposes of the 2012/13 registration review cycle, regulatory bodies with few internationally educated applicants and/or that rely heavily upon third parties for their assessment process participated in a self-assessment review process.

The review process had several steps: agreeing to a review schedule, arranging for the involvement of key staff and council members, participating in a two-day self-assessment workshop, drafting an action plan and finalizing the plan in consultation with the Fairness Commissioner.

The process was designed to support meaningful reviews that concretely identify fairness issues and lead to progressive change.

The Fairness Standard and Self-Assessment Workshop

As a first review encounter with the OMFC, regulatory practice was evaluated against a single broad fairness standard as defined by the OMFC's *Fairness Standard and Criteria Document*:

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.

This fairness standard covers the full spectrum of fair assessment and registration practice and is defined with multiple elements and criteria in the *Fairness Standard and Criteria Document*.

Over the course of a two-day self-assessment workshop, the standard was explained and regulators examined their practice in light of the various elements and criteria involved. Special emphasis was placed on the importance of clear, complete and accurate assessment and registration information, fair third party assessment practice and the consideration of qualifications acquired through professional work experience. Solutions and best practice models were presented as regulators drafted action plans to address issues of concern.

Action Plan & Compliance Statement

Shortly after the workshop, regulators submitted board-approved Action Plans to the OMFC. Regulators met with the Fairness Commissioner to discuss the plans and in some instances, revisions were made.

The Action Plan contained in this report has been reviewed by the Fairness Commissioner and is comprised of actions needed to address fairness concerns and improve compliance to *The Fair Registration Practices in Regulated Professions Act*.

Concluding this report, 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.

Overview of the Assessment and Registration Process of the College of Dietitians of Manitoba

The College of Dietitians of Manitoba (CDM) regulates the profession of dietetics in Manitoba under the authority of *The Registered Dietitians Act* (C.C.S.M. c.R39) and Regulation (234/2004). Only persons licensed and registered with the CDM can practice dietetics and use the title of 'Dietitian', 'Registered Dietitian', 'Graduate Dietitian,' and 'Dietetic Intern' in Manitoba.

Dietitians organize, conduct and supervise programs in nutrition, diet and food service. Practitioners are employed in private and public sectors, including hospitals, nursing homes, and educational institutions.

Provincial statistics indicate that 23 internationally educated dietitians (IEDs) immigrated to Manitoba from 2005 to 2011.

Qualifications

Chief qualifications required for registration as a dietitian include possessing a baccalaureate degree in nutritional sciences approved by CDM's Council and completing a Council approved dietetic internship program. Individuals must also successfully complete the Canadian Dietetic Registration Competency Examination (National Exam).

Assessment Registration Process

For internationally educated dietitians, the key steps in the assessment and registration process are as follows:

CDM Application

Applicants first must arrange a credential assessment from the University of Toronto's World Education Services (WES) and then apply to the CDM; applicants must complete a CDM application form, pay an initial application and assessment fee of \$480.00 and supply the following documentation. If documents are not in English or French, notarized translations are required.

- Credential assessment report directly submitted from WES;
- Original or notarized transcripts of university degree sent directly from the university to CDM;
- Course descriptions from the calendar of the university the applicant attended;
- A copy of each degree or certificate of graduation;
- A detailed summary of internship/practicum education program;
- A letter from the education program director that states that the program contained experience in Clinical/Therapeutic Nutrition, Food Service Administration, Community Health and was supervised by a registered dietitian;

- Original or notarized copy of graduation certificate from a dietetic internship or practicum training. The certificate must be sent directly from the facility to the College office;
- Complete a competency self-assessment form. This form lists the competencies for entry level dietitians and provides information as to what skills are needed in order to work as a dietitian in Manitoba;
- Copy of previous license or membership of another regulatory body;
- Provide proof of language proficiency, if applicant has earned their degree in another language besides English or French;
- Proof of continuing education;
- Original of criminal record search;
- Proof of identity.

Applications are assessed by the CDM's Board of Assessors. Upon completed application, the initial assessment of application takes 4 to 6 weeks.

Applicants may either be deemed eligible to write the Canadian Dietetic Registration Examination or required to upgrade academic coursework and/or need to complete a practicum assessment.

A variety of online coursework is available to address a variety of academic gaps.

The CDM's practicum assessment is a 9 to 12 week program that tests an applicant's practical skills. The cost for each week of the assessment is \$150.00. There is also an administration fee of \$350.00.

Graduate Registration and the Canadian Dietetic Registration Examination

Upon being deemed eligible, applicants are required to register as a 'Graduate Dietitian' and next proceed to apply and write the Canadian Dietetic Registration Examination (National Exam). The fee for a Graduate Dietitian license is prorated at a monthly rate of \$43.75.

The National Exam is in two parts, each three hours in length and in multiple choice formats. It evaluates fundamental dietetic practice knowledge. The exam costs \$400.00 and can be written in May and November. Written results are usually provided within six weeks. Candidates who fail the exam are allowed to re-write the exam up to two additional times at a cost of \$400.00 per write. Candidates usually receive their results within six weeks.

Full Registration

Upon successfully completing the National Exam, applicants must secure liability insurance and pay a \$525.00 CDM registration fee. Dietitians working in Manitoba must have liability insurance coverage to a minimum of \$5,000,000.00. Insurance can be obtained through their employer, Dietitians of Canada or other insurance providers.

Appeal Process

Registration decisions that deny or condition registration can be appealed to CDM's Council. The right to appeal is referred to in the letter outlining the results of the assessment from the Board of Assessors. Applicants must appeal in writing, specifying the reason for appeal within 30 days of receipt of the decision. Appeal hearings are scheduled within 90 days of notification and appeal decisions are delivered within 90 days of the hearing.

Time and Cost

The time and cost to register as a dietitian vary depending on the circumstance of the applicant.

Internationally educated dietitians with academic credentials judged to be substantively equivalent to the Canadian standard, including the practicum component of the standard, can register in less than a year. Graduate Dietitian registration is possible within six weeks of completed application. Full registration will require the successful completion of the fixed date National Exam and will add up to seven months to the process. Direct registration costs total approximately \$1,500.00. Additional, associated costs may be incurred securing and translating documents and preparing for the National Exam.

The time and cost to register are significantly extended and increased if academic upgrading and a practicum program are required. University coursework is costly and may require a year or more to complete. The practicum assessment will take up to 12 weeks and cost up to \$1,800.00.

Direct Costs

<i>Fee</i>	<i>Cost</i>
Initial Application Fee	\$80.00
Assessment Fees:	
• Academic Assessment	\$250.00
• Practicum Assessment	\$250.00
• Both	\$400.00
TOTAL:	\$480.00 (application fee, both assessment fees)
Practicum Program	\$150.00/week \$1,800.00/12week max
Canadian Dietetic Registration Examination	\$400.00 \$400.00 re-write
Insurance	\$90.00-\$120.00
Graduate Dietitian Registration	\$43.75/month
Dietitian Registration	\$525.00

College of Dietitians of Manitoba's Action Plan

In response to the self-identified Compliance Issues, the College of Dietitians of Manitoba proposed the following action plan as of February 2013. The plan is reprinted under the 'CDM's Planned Actions' column in the table below.

The CDM's Action Plan will form the basis of its relationship with the OMFC moving forward. The plan is monitored by the OMFC and will be tracked in the 'Completion Date' box of the Action Plan as it comes to fruition. As the report will be available online, this allows any interested party to see the progress to date.

Compliance Issues	CDM's Planned Actions	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
There is a need to improve the information provided by the CDM about its qualification requirements and criteria used to assess qualifications.	Provide clear information about the following: <ul style="list-style-type: none"> CDM will clearly outline the non-exemptible requirements for registration on the CDM website. 				February 2013
There is a need to improve the information provided by the CDM about the Canadian Dietetic Registration Examination.	<ul style="list-style-type: none"> CDM will better define the purpose and process of the CDRE (Canadian Dietetic Registration Examination). CDM will better define the CDRE appeal process in case of an examination failure. 				February 2013
There is a need to improve the information provided by the CDM about the practicum assessment program.	<ul style="list-style-type: none"> CDM will introduce clear information of the practicum assessment program, as part of their registration and posted on the website. 	✓			
There is a need to develop a formal policy on alternative documentation.	<ul style="list-style-type: none"> CDM will create a policy on providing alternative documentation, when applicants are unable to provide documentation. 		✓		
There may be a need to revise the CDM's criminal records check policy.	<ul style="list-style-type: none"> CDM will investigate the opportunity to accept applications with permanent resident cards as having a clean records check undertaken by the Federal Government from their home country prior to immigrating. 		✓		

Compliance Issues	CDM's Planned Actions	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
There may be a need to revise the CDM's criminal records check policy.	<ul style="list-style-type: none"> Upon review, CDM will develop a policy on providing a criminal record check from their home country if they have been out of Canada for more than 6 months. 				
There is a need to develop a policy for applicants that disclose records.	<ul style="list-style-type: none"> CDM will create a policy on process if an applicant has a conviction. 		✓		
There is a need to provide clear appeal information.	<ul style="list-style-type: none"> CDM will place a statement on the website and part of application guide, as follows: All assessments can be appealed to the credential agency. 				February 2013
There is a need to ensure proper training for the CDM's Board of Assessors.	<ul style="list-style-type: none"> CDM will develop a formal training program for Board of Assessors. 			✓	
There is a need to ensure proper appeal training for the CDM's Council.	<ul style="list-style-type: none"> CDM will develop a formal training program for Council on appeals. 			✓	
There is a need to provide more employment and alternative career information.	<ul style="list-style-type: none"> The CDM website has a menu tab that provides IED with helpful links. We will include WRHA job opportunities, HRSDC Job Bank, hospital job links, and MAHE (Manitoba Association of Home Economists) 	✓			

Fairness Commissioner's Statement of Compliance

The College of Dietitians of Manitoba's (CDM) Action Plan is a productive response to the registration review. The College's proposed actions will support fairer practice and improve its compliance to *The Fair Registration Practices in Regulated Professions Act*.

The proposed improvements to the information the College provides will complement the work they have done developing a very helpful 'Application Guide for Internationally Educated Dietitians.' Better training for staff, formally articulating and rationalizing policies will help ensure transparency, well-executed assessments and an efficient process for applicants.

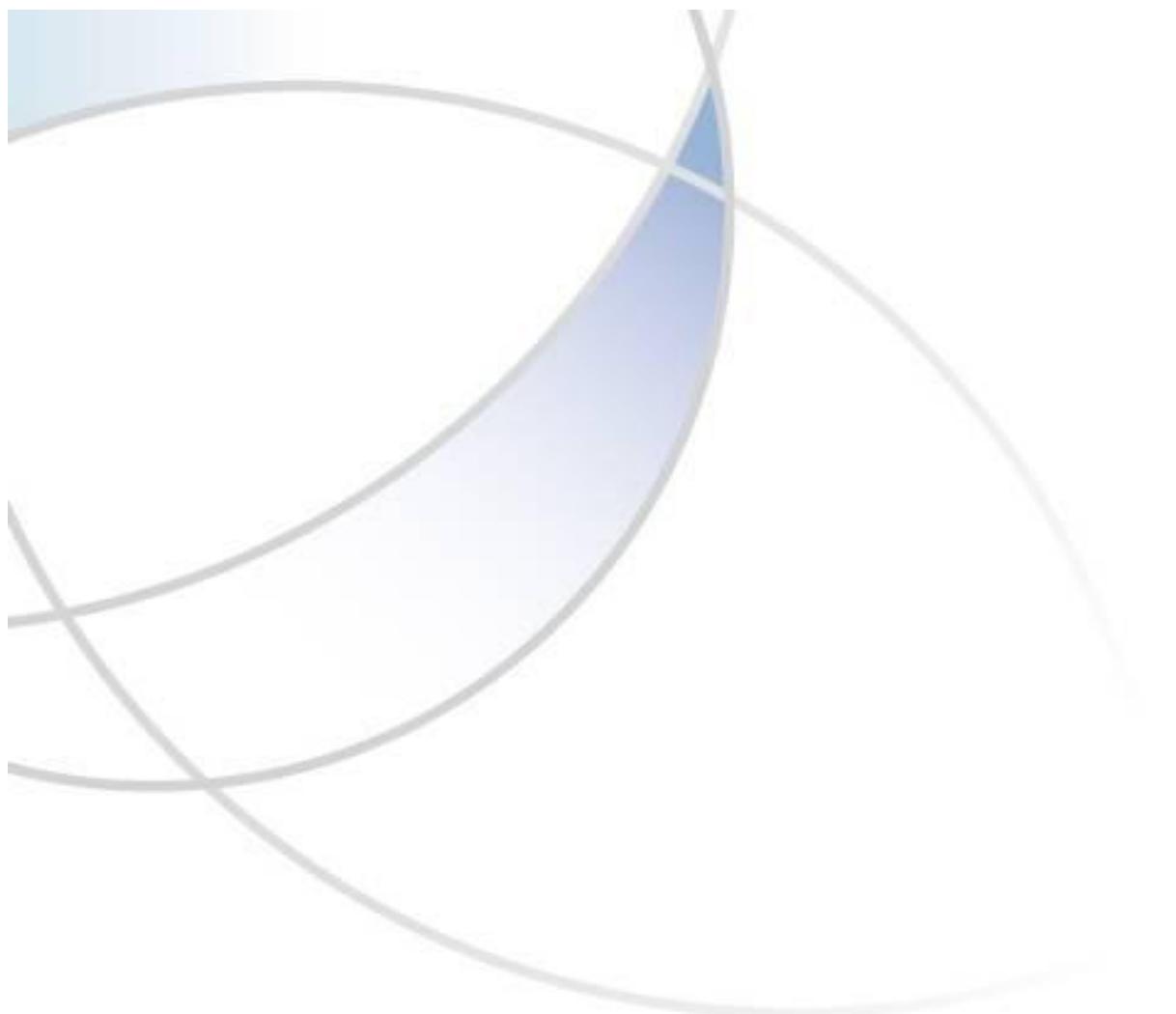
We appreciate the participation and energy that CDM's staff and Council members brought to our self-assessment workshop. The commitments they have made to improve the College's registration process speak to the integrity of their participation and their commitment to fair practice.

We look forward to a continued positive and fruitful relationship.



Ximena Munoz

Manitoba Fairness Commissioner



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