

2017 Registration Review Report

College of Dental Hygienists of Manitoba

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Executive Summary

The 2017 Registration Review Report for the College of Dental Hygienists of Manitoba (CDHM) examines their state of progress with regard to the fair consideration of individuals educated outside of Canada. The Fairness Commissioner identifies progress opportunities and CDHM responds with an action plan.

CDHM's licensure process for internationally educated dental hygienists (IEDHs) trained in approved programs in the United States is straightforward and effective. From 2011 to 2016, CDHM had two internationally educated applicants. Both of these individuals trained in the United States and successfully registered.

Applicants trained outside of accredited dental hygiene programs in Canada and the United States do not have a well-defined licensure pathway. In addition to passing the national exam, these individuals must also complete a competency assessment with possible gap training. Previously, a competency assessment and gap training were available at the University of Manitoba's Faculty of Dentistry. However, this is no longer available and an out-of-province assessment may be a possibility.

Subsequent to their 2012 registration review with the Office of the Manitoba Fairness Commissioner's (OMFC), CDHM took steps:

- Significantly improving registration information for IEDHs
- Increasing the application window for the submission of documents
- Contracting the National Dental Hygiene Certification Board to introduce information about the alternative documentation and the appeal process

In the current review, the Fairness Commissioner identifies a need for CDHM to

- Ensure a timely, effective licensure pathway for IEDHs in need of a competency assessment and possible gap training
- Update registration information and streamline documentation requirements
- Continuing work with the OMFC to improve data collection

In response, CDHM commits with plans to:

- Investigate and provide information about the competency assessment in Alberta
- Contact the national body to discuss releasing documents

The Fairness Commissioner sees some confusion regarding the opportunity for a competency assessment and some of CDHM's commitments are concerning. As of December 2017, CDHM's management and staff are in transition and OMFC will follow-up with CDHM's new management in 2018 to resolve these issues.

Introduction

The Fairness Commissioner conducts registration reviews following her mandate under *The Fair Registration Practices in Regulated Professions Act* (Act) to review the assessment and registration practice of regulatory bodies subject to the 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 for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that registration reviews are 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.

This 2017 registration review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

This report evaluates the College of Dental Hygienists of Manitoba's (CDHM) assessment and registration practice in terms of its overall state of fair practice and for purpose of identifying progress opportunities. This includes an analysis of CDHM's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

This report is a public document and will be posted on the OMFC's website and submitted to the Minister of Education and Training and the Minister of Health, Seniors and Active Living.

Context of the Profession in Manitoba

Dental hygienists are regulated primary oral health care professionals who specialize in clinical preventive and therapeutic therapies, oral health education, and health promotion. Dental hygiene is a health profession involving theory and evidence-based practice, drawing upon the biomedical, social, and behavioural sciences, and the body of dental hygiene knowledge. The practice of dental hygiene involves collaboration with clients, other health professionals, and the public to achieve and maintain optimal oral health, an integral part of well-being.

Dental hygienists in Manitoba work in a variety of settings including dental offices, health care facilities, and personal care homes.

In many regions of the world, dentists provide dental hygiene services. The model of practice and training in Canada, however, is sufficiently specialized that internationally educated dentists require completion of a formal dental hygiene education to qualify for licensure in Canada.

In Manitoba, the profession of dental hygiene has been self-regulated since 2008. As of April 30, 2017, the College of Dental Hygienists of Manitoba (CDHM) has 830 registered members.

CDHM had two internationally educated dental hygienists license between 2011 and 2016, with an average time to registration of just over six months. These dental hygienists trained in the United States.

Provincial immigration statistics indicate that 15 dental hygienists identifying under the National Occupational Classification 3222, Dental Hygienists and Dental Therapists, immigrated to Manitoba from 2011 to 2016.

Overview of Assessment and Registration Process

The College of Dental Hygienists of Manitoba (CDHM) currently operates under the authority of *The Dental Hygienists Act* (S.M. 2005, c. 51) and the Dental Hygienists Regulation (Regulation 80/2008). In Manitoba, all dental hygienists practicing and using the title of Dental Hygienist must be registered with the CDHM.

Qualifications

The substantive qualifications needed for registration as a dental hygienist includes the successful completion of an accredited, minimum two-year dental hygiene program and the National Dental Hygiene Certification Exam (NDHCE).

Internationally educated dental hygienists who did not graduate from a dental hygiene program accredited by the Commission on Dental Accreditation of Canada or the American Dental Association Commission on Dental Accreditation must apply to the National Dental Hygiene Certification Board for the assessment of their dental hygiene educational credentials and qualifications to determine their eligibility to write the NDHCE.

Assessment and Registration Process

There are two key steps in the registration process:

1. First, applicants apply to the National Dental Hygiene Certification Board (NDHCB) to write the NDHCE. For internationally educated dental hygienists, this step involves completing a signed application form, paying an application fee, and completing a 'Document Release Form' submitted to the applicant's educational institutions. The following documentation is needed:
 - If necessary, a notarized copy of legal name change documents
 - An original or a notarized copy of dental hygiene diploma/certificate/degree, submitted by the applicant. Photocopies are not acceptable
 - A legal description of the practice of dental hygiene in the jurisdiction/country of education, directly submitted by the dental hygiene regulatory authority
 - An official transcript of grades/mark sheets/academic records, submitted directly to the NDHCB office by the dental hygiene educational institution of graduation
 - A basic credential assessment directly submitted from WES, ICES or IQAs
 - Proof of previous registration or a letter of eligibility for dental hygiene registration submitted directly by the regulatory authority

All documents must be in French or English. If not, applicants must arrange for certified translations.

Upon completed application, the NDHCB assesses the applicant's educational credentials for their equivalence to the Canadian standard. Within two months, applicants are informed in writing whether they are eligible to write the NDHCE. Applicants submit a completed exam application and the current exam fee.

The NDHCE is a four- hour, 200-question, computer-based, multiple-choice format test that assesses knowledge of entry-level dental hygiene practice competencies. The exam is offered three times annually in Winnipeg, and at other major centres throughout the country. Applicants are informed in writing of their exam results within six weeks.

2. Upon successfully writing the NDHCE, applicants must then apply to the College of Dental Hygienists of Manitoba. Applicants provide a completed application form, pay the current application fee, a pro-rated registration fee, and supply the following documents:
 - Notarized copy of identification
 - A copy of Dental Hygiene diploma/certificate(s), submitted directly by the educational institution
 - Proof of previous registration and evidence of good standing, directly submitted by the regulating authority
 - If applicable, evidence of additional dental hygiene practice modules
 - A notarized copy of the NDHCB certificate indicating successful completion of the NDHCE
 - Evidence of completion of a CPR – Level C Healthcare Provider course in the last 12 months
 - Evidence of possession of a minimum \$3 million aggregate liability insurance coverage

Applicants are informed in writing of the CDHM's Board of Assessors decisions regarding registration upon receipt of online application and hard copy documents.

Appeal Process

Applicants denied registration or registered with conditions can appeal the decision to CDHM's Council. NDHCB also provides an opportunity for applicants to appeal an unfavorable assessment decision to write the NDHCE. NDHCB'S review committee is independent.

Time and Cost

Depending on the circumstances of the applicant, time to register as a dental hygienist will vary. Upon completed application to the NDHCB, passing the NDHCE exam and registration with CDHM may take as little as 6 months. This does not include the time needed to arrange documentation, or if needed, the time to complete exam re-writes.

Direct costs will total approximately \$1,600. This does not include associated costs for acquiring and if necessary translating documents, preparing for the national exam, liability insurance or if necessary CPR course.

Direct Costs

As of December 2017

NDHCB Assessment and Exam fee: \$800

CDHM Application: \$300

CDHM Registration Fee: \$500 pro-rated for new graduates only from June to December 1 (\$250)

Liability Insurance: Cost varies. Can be obtained through the Canadian Dental Hygienist Association (CDHA) as one of the benefits of membership fee of \$325, or the Canadian Dentist' Insurance Program (CDSPI) premium of \$100.

CPR Level C Healthcare Provider course: Cost is dependent upon certification/recertification, length of course, and provider

State of Progress

The College of Dental Hygienists of Manitoba (CDHM) licensure process for dental hygienists trained in academic programs accredited by the Commission on Dental Accreditation of Canada or the American Dental Association Commission on Dental Accreditation is straightforward, timely and effective.

Individuals trained in unrecognized programs need to have NDHCB deem their academic qualifications substantively similar to Canadian standards to be eligible to write the NDHCB Exam. Currently, those identified with gaps do not have a pathway to remediate issues and for further assessment.

Manitoba IEDH applicants in this circumstance used to have an opportunity to complete a competency assessment and gap training conducted at the University of Manitoba's Faculty of Dentistry. This opportunity is no longer available.

Since it began operating, CDHM has seen fewer than five internationally educated applicants. Most in this group trained at accredited U.S. programs and so did not need a competency assessment or gap training.

CDHM had only one applicant undergo the University of Manitoba's competency assessment. CDHM showed strong leadership and did a remarkable job working with the University of Manitoba's Faculty of Dentistry providing this individual assessment and gap training. Unfortunately, CDHM reports this assessment and gap-training option is no longer feasible at the University of Manitoba.

OMFC understands the profession has discussed developing a national competency assessment, but that no assessment is under development at this point.

2012 Registration Review and Recent Progress

CDHM underwent an OMFC registration review in 2012 and was commended for a variety of best practices. Most notable was CDHM's commitment to IEDH applicants and its support for the individual who underwent the competency assessment and gap training process at the University of Manitoba.

In response to the Fairness Commissioner's concerns regarding registration information and documentation requirements, CDHM took steps:

- Improving registration information, including the introduction of a new, dedicated landing page and web section for IEDH's and a revised guide for the competency assessment.

The new assessment and registration material is a big improvement offering applicant-friendly, step-by-step information, including helpful videos as well as immigration and financial support information.

- Increasing the application window for applicant to submit documents from four months to a year.

- Introducing appeal information and developing a formal policy regarding the provision of written reasons for unfavorable appeal decisions.
- Requesting NDHCB provide better information about its alternative documentation policy and its appeal process; this information is now available.

Substantive Progress Opportunities

With the University of Manitoba’s competency assessment and gap training process no longer available, progress in this profession will revolve around CDHM’s ability to ensure a timely, effective pathway remains possible for IEDHs with academic training not recognized by NDHCB. The University of Alberta, for instance, currently offers a dental hygiene refresher program that may be worth exploring as an option.

CDHM has worked cooperatively with the OMFC to supply registration data on Manitoba’s IEDHs.

OMFC understands IEDH applicants first have to approach and apply for an NDHCB assessment before applying to CDHM. Some may not apply to CDHM if licensure is unlikely. With no application to CDHM, these individuals will not show up in CDHM’s registration data. Further exploration of the data collected from NDHCB is needed to see if we can obtain a fuller picture of what is happening for all Manitoba IEDHs seeking licensure.

Continued work improving data collection will be helpful to ensure we have a complete, fact-based understanding of timelines and outcomes. This data may also be helpful to support any future considerations to improve the process.

Additional Fairness Concerns

At the time of CDHM’s 2012 OMFC registration review, the Fairness Commissioner identified a few fairness issues that remain outstanding. Specifically, there is a need for CDHM:

- To synchronize documentation requirements with NDHCB so that applicants do not have to repeatedly arrange the third-party submission of the same documents.
- Following a recommendation from the Fairness Commissioner, CDHM requested NDHCB waive its previous registration requirement or eligibility for registration in the circumstance of recently immigrated graduates. NDHCB declined to take action. However, CDHM’s response to the OMFC suggests there might be some confusion about what is being called for, which is a waiver for recent graduates and recent graduates alone.

Further fairness issues involve the need for CDHM:

- To update its registration information. The current material suggests the University of Manitoba's competency assessment is still an option
- To make CDHM's application form, including its documentation requirements and fees available on its website
- To review the documentation requirements to ensure they are reasonable

Progress Opportunities

The Fairness Commissioner sees the following opportunities for progress regarding the College of Dental Hygienists of Manitoba's assessment and registration practice:

1. A timely, effective licensure pathway is needed for IEDHs with academic training not recognized by NDHCB and in need of a competency assessment and possible gap training.
2. Work with NDHCB to synchronize documentation requirements and streamline the process of supplying documents for applicants. Eliminating CDHM's notarization requirements for several documents would also further streamline the process.
3. Assessment and registration information needs updating to reflect the current licensure pathways. Making application forms, documentation requirements and fees available on CDHM's website would also be helpful.
4. Continuing work with the OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for Manitoba IEDH applicants. This includes the need to explore data collection from the NDHCB to ensure we have a good understanding of IEDH's from Manitoba who engage in the national process.

Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that the College of Dental Hygienists of Manitoba take action regarding these progress opportunities.

College of Dental Hygienists of Manitoba – Action Plan

In response to the Fairness Commissioner’s recommendation, the College of Dental Hygienists of Manitoba (CDHM) proposed the following Action Plan as of December 11, 2017.

Progress Opportunity	Action(s)	Completion Date
<p>1. A timely, effective licensure pathway is needed for IEDHs with academic training not recognized by NDHCB and in need of a competency assessment and possible gap training.</p>	<p>IEDHs cannot have a competency assessment without successful completion of the NDHCE. There is currently no gap training or clinical competency assessment available in Manitoba. Due to the small number of IEDHs requesting registration in Manitoba, it is not financially feasible to offer and administer these. IEDHs must apply to an accredited Canadian dental hygiene education program if they are unsuccessful in passing the NDHCE or clinical competency assessment in another province.</p>	<p>None</p>
<p>2. Work with NDHCB to synchronize documentation requirements and streamline the process of supplying documents for applicants. Eliminating CDHM’s notarization requirements for several documents would also further streamline the process.</p>	<p>We will contact CDHM’s legal counsel regarding the elimination of notarization and responsibility for breaches in regulation and legislation. Once this is complete, we will contact NDHCB regarding the need for a release document if this even an option.</p>	<p>March 31, 2018</p>
<p>3. Assessment and registration information needs updating to reflect the current licensure pathways. Making application forms, documentation requirements and fees available on CDHM’s website would also be helpful.</p>	<p>We will contact the University of Alberta for further information and details to be put on the CDHM website. The University of Alberta only schedules the clinical competency assessment for every April. We will wait for current information and fees for 2018 before posting online.</p>	<p>May 30, 2018</p>

Progress Opportunity	Action(s)	Completion Date
<p>4. Continuing work with the OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for Manitoba IEDH applicants. This includes the need to explore data collection from the NDHCB to ensure we have a good understanding of IEDH's from Manitoba who engage in the national process.</p>	<p>We will continue to track the IEDHs who apply to Manitoba with the CDHM.</p> <p>The NDHCB does not track this information as they have 30 to 40 phone inquiries per year, most of these being foreign-trained dentists who are not eligible to write the NDHCB exam. Approximately 20 per cent (eight to 10) of inquiries are from dental hygienists who may qualify to write the exam. Only half of these (three to four) write the exam. These are not necessarily applicants who will be applying to Manitoba.</p>	<p>Year end – April 30 of each year.</p>

College of Dental Hygienists of Manitoba Comments

We are working to accommodate the OMFC's suggestions and recommendations.

Action Plan Follow-Up

A planned follow-up meeting with CDHM and the OMFC will occur in January 2019 to discuss the implementation status of the Action Plan.

Statement of Compliance

The College of Dental Hygienists of Manitoba's action plan has some positive elements. We are pleased that the College will be seeking further information and details about the clinical competency assessment in Alberta and whether this will be a possibility for internationally educated applicants from Manitoba.

The College is currently undergoing management and staffing changes that have resulted in some confusion in this review.

The College's commitments to improve documentation policies and data collection may be a result of a lack of clarity regarding what is being asked.

Given the College's commitment to accommodate our suggestions and recommendations, I am confident we can better address these issues once the new management team is in place



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 2017 Registration Review Process

The OMFC's review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
Registration Review Workshop	<ul style="list-style-type: none"> Group meeting between OMFC and regulators Latest data and research presented Fairness Standard, review focus and process presented Review schedule provided 	June 10, 2016
Progress Report	<ul style="list-style-type: none"> Report CDHM fair practice progress Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities Progress opportunity identified Recommendation from Fairness Commissioner to address the progress opportunity 	November 29, 2017
Progress Meeting	<ul style="list-style-type: none"> CDHM and Fairness Commissioner discuss report and possible actions CDHM is considering addressing the progress opportunity 	November 16, 2017
CDHM Action Plan	<ul style="list-style-type: none"> CDHM's Action Plan submitted to OMFC 	December 14, 2017
2017 Registration Review Report	<ul style="list-style-type: none"> Report submitted to CDHM Report contains the review findings, CDHM's Action Plan, and the Fairness Commissioner's Compliance Statement 	January 16, 2018
Registration Review Closeout Meeting	<ul style="list-style-type: none"> CDHM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how CDHM's action plan will inform the relationship moving forward Registration Review Report submitted to Minister of Education and Training, the Minister of Justice and uploaded on OMFC website 	Due to staff changes, no meeting occurred
Action Plan Follow-Up	<ul style="list-style-type: none"> Meeting between CDHM and OMFC to discuss status of action plan implementation 	January 2019

Review participants:

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