# 2017 Registration Review Report College of Medical Laboratory Technologists of Manitoba

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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## **Executive Summary**

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

Many aspects of CMLTM's licensure process for internationally educated medical laboratory technologists are progressive. As part of their national certification process, internationally educated applicants (IEAs) benefit from self-assessment tools and a prior learning assessment approach that results in individualized learning plans where necessary. CMLTM allows IEAs to work under supervision on a Conditional Certificate to Practice once their gaps are addressed. This supports exam success by providing exposure to the practice of medical laboratory technology in Canada and allows individuals to start to use their skills sooner. CMLTM has been a strong supporter of Manitoba's Bridging Program for IEAs and sits on a working group formed to improve the program experience for participants and employers.

Members and staff have been trained to facilitate professional practice seminars – a series developed collaboratively by the OMFC to provide IEAs with an introduction to profession specific workplace culture and communication in Canada. CMLTM has jointly delivered these seminars with two other allied health professions. They have also improved their web information, developing an easy to navigate landing page for IEAs and introducing new resources to support applicants.

The Fairness Commissioner identifies the need for ongoing work with key stakeholders to increase capacity to support IEAs to address learning plans and other areas of need and to create more opportunities for supervised practice. The Fairness Commissioner also asks for continued work to improve registration data collection and web updates.

In response to the identified progress opportunities, CMLTM commits to:

- Rebuilding their website and updating content
- Initiating discussions with key stakeholders regarding the need for increased opportunities for supervised practice to better support IEAs in the certification process
- Continue to support Manitoba's bridging program through its participation in a working group
- Facilitating discussions with CSMLS to determine an approach to data collection that would provide an understanding of Manitoba IEAs' experience with the first step in the certification process

CMLTM's action plan is a positive response to the identified progress opportunities. Where appropriate, the Fairness Commissioner will support and facilitate CMLTM's actions.

## Introduction

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 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.

The 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.

In this report, CMLTM's assessment and registration practice is evaluated in terms of its overall state of fair practice and for the purpose of identifying progress opportunities. This includes an analysis of CMLTM'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, submitted to the Minister of Education and Training and the Minister of Health, Seniors and Active Living.

## Context of the Profession in Manitoba

Medical laboratory technologists (MLTs) are responsible for performing laboratory investigations on the human body or on specimens taken from the human body, and the interpretation of quality control data to verify the accuracy and precision of investigation results, for the use by other health professionals in the diagnosis, treatment and prevention of disease.

In Canada, there has been a movement towards a collaborative patient-centred model of care which is shown to improve patient safety and health outcomes. This demands highly-trained MLTs with expertise in both medical laboratory technology techniques and excellent interpersonal communication skills in order to work effectively with patients and other healthcare providers to improve patient health outcomes.

Although not currently the case in all Provinces, in Manitoba the current and future demand for MLTs exceeds the graduation capacity of the only medical laboratory sciences program in the province which is offered at Red River College (RRC). There are currently approximately 960 practicing MLTs registered with CMLTM. For the last five years there has been an average of 60 MLTs retiring and leaving the profession annually. The Red River College MLT training program has an attrition rate of approximately 30 per cent and graduates an average of 28 MLT students that enter the profession annually. This situation creates a deficiency of practicing MLTs which negatively impacts laboratory services and ultimately patient care. CMLTM has been working with other stakeholders through the RRC program advisory committee to revise the program entrance requirements in the hopes of reducing attrition and achieving more graduates.

Since 2010 there have been 85 internationally educated applicants (IEAs) to CMLTM of which 62 have successfully passed the national exam and entered the practice with full registration with CMLTM. Internationally educated medical laboratory technologists (IEMLTs) are an important part of the plan to address the shortage of MLTs in Manitoba.

Over the years, IEAs have experienced difficulty passing the national examination and therefore difficulty in obtaining eligibility for full registration with CMLTM. The pass rate for IEAs without a bridging program is only 15 per cent compared to the national average for domestically trained MLTs of 85 per cent. This prompted the development of a bridging program that was federally funded and delivered by Diagnostic Services of Manitoba (DSM) in 2007. The DSM bridging program has had success but continues to see participants struggle to pass the exam and be successful in practice.

The DSM program has been funded via a number of sources since its inception, including the former Manitoba Labour and Immigration, Manitoba Health, Seniors and Active Living (MHSAL), and with project funding under MHSAL's agreement with Health Canada under the Internationally Educated Health Professionals Initiative. MHSAL hopes to stabilize program funding on an ongoing basis. To this end, a program working group has been established and a number of actions identified, including assessing and addressing English

language strengths and weaknesses, adding a communication and Canadian cultural content course, conducting a focus group with employers, and developing resources to better prepare IEMLTs to meet employer expectations for practice.

Currently, the bridging program is limited to six IEMLTs annually. Clinical placement capacity is a significant limitation on the ability to expand numbers. Participants are provided tuition free of charge in exchange for a three year Return of Service commitment with DSM or an alternate Manitoba employer. The program working group will consider ways to expand capacity, including engagement of private laboratories.

## **Overview of Assessment and Registration Process**

The College of Medical Laboratory Technologists of Manitoba (CMLTM) regulates the profession in Manitoba under the authority of *The Medical Laboratory Technologists Act of 2002* (C.C.S.M. c. M100). Registration by the CMLTM grants the right to title. Only registered members can represent themselves as a medical laboratory technologist or any of its variations.

#### Qualifications

There are two principal qualifications required for registration with the CMLTM as a medical laboratory technologist. Individuals must possess a medical laboratory technologist diploma/degree from an educational program accredited by Conjoint Accreditation Services, of the Canadian Medical Association (CMA). Programs outside of Canada are not accredited by this body. Secondly, applicants must pass the MLT certification examination provided by the Canadian Society for Medical Laboratory Sciences (CSMLS).

Internationally educated applicants must first undergo the CSMLS's Prior Learning Assessment (PLA) to determine if their academic training and professional work experience provide substantively equivalent training to the Canadian standard. Applicants may have to complete remedial training via a customised learning plan before they can sit the national certification examination needed to qualify for Active Practice in Manitoba.

#### Assessment and Registration Process

## Step 1 – Go through the Self-Assessment Readiness Tool (SART) and complete the Personal Competency Rating Booklet (PCRB)

#### SART

Accessible through CSMLS's website, this tool is designed to help internationally educated health professionals understand the requirements for medical laboratory science professions in Canada.

#### PCRB

This self-assessment tool has two purposes:

- to allow a candidate to compare their education and training to the standard for Canada to help candidates identify gaps and decide if completing the PLA is right for them
- to support the CSMLS assessment team who use candidate ratings to help them complete an assessment. Ratings must be confirmed by the candidate's official supporting documents such as education and experience documents

#### Step 2 - Complete the PLA Online Self-Assessment (OSA)

The OSA consists of 100 questions and is intended to give candidates insight into medical laboratory practice in Canada and their readiness to practice in the Canadian workforce. Candidates who choose to pursue the certification process to register as medical laboratory technologists must complete all 100 questions before applying for the PLA. The fee is \$60.

There is no minimum passing score. The OSA score and report are for information purposes only and CSMLS does not use them to decide a PLA result. The OSA is designed to provide information that will help candidates decide whether to pursue Canadian certification. It also provides feedback to help candidates identify areas in which they may need more education, based on the CSMLS Competency Profile, which is the national standard in Canada.

#### Step 3 – Complete the Prior Learning Assessment (PLA)

CSMLS uses this process to assess the applicant's education, training and work experience to determine equivalence to the Canadian standard as defined by the CSMLS Competency Profile.

The application to CSMLS to begin the PLA process includes the following documents which must be provided within 12 months of application:

- Completed application form and the fee of \$1,540 (\$820 PLA application fee + \$720 PLA technical report fee. The technical report fee can be sent separately once all documentation is received by CSMLS and before they assess the file.)
- Completed Personal Competency Rating Booklet (PCRB) original
- On-line Self-Assessment (General MLT only) applicants must create an account online and complete the online self-assessment. Once complete they must forward the account username to the CSMLS
- Credential Evaluation Report sent directly from WES or ICES
- Proof of English or French Language Proficiency if MLT education was not in English or French sent directly to CSMLS from the language testing centre
- MLT Education sent directly from the issuing institution to CSMLS:
  - Official educational transcripts
  - Course outlines/Syllabus of studies
- Clinical Education (practical internship) Documentation official outline of scope and volume of testing performed sent directly from the applicant's educational institution
- Other Academic Education (if applicable) official transcripts and course outline sent directly from the issuing educational institution

- Continuing Education (if applicable) official transcripts and course outlines sent directly from the issuing educational institution
- Professional Development (if applicable) copies of certificates from seminars and workshops
- Professional Registration (if applicable) proof of professional certification and status sent directly from the licensing authority outside of Canada
- Work Experience letters sent directly from employers including detailed outline of responsibilities and tests performed (waved if recent graduate with no previous work experience as a MLT)

If documents are not in English, notarized translations are required.

The SART and PCRB are used by assessors to cross reference documents in the PLA process.

The assessment takes four to six weeks once all required documents are received by the CSMLS office.

Once the file has been assessed the applicant will receive a PLA Technical Report. The Technical Report lists the experience found in the documentation, is valid for two years and includes one of three possible outcomes:

- 1) Applicant meets the requirements and is eligible to write both the MLT and the Medical Laboratory Assistant (MLA) certification examinations.
- 2) Applicant meets the majority of requirements, but there are identified gaps that must be addressed before being eligible to write the certification examination.

In this instance the CSMLS will advise applicants about remedial gap training opportunities. This includes a learning plan outlining required courses and educational institutions offering those courses. Completing a supervised clinical placement is another means of addressing learning plan requirements. The applicant is also given the option to complete an IEMLT bridging program to address their educational gaps. Three bridging programs are currently available in Canada; two in Ontario and one in Manitoba.

3) The applicant's education and experience is not deemed to be equivalent to the Canadian standard. The applicant therefore does not meet the requirements to be a Registered Medical Laboratory Technologist. Applicants receive information about completing a Canadian program or are provided with information on alternative careers.

The most common outcomes for PLA applications by internationally educated applicants reviewed by the CSMLS are numbers 2) and 3).

#### Step 4 – Complete the assigned Learning Plan (if required)

Applicants required to complete a learning plan to qualify for the CSMLS Certification Exam must do so within two years. Those who are unable to complete their learning plan within two years may be required to complete more course work and/or pay additional fees. Once the learning plan is completed, applicants must ensure an official transcript is sent directly to CSMLS from the educational institution at which their required course work was completed.

Once an applicant is declared "equivalent" and has met the language proficiency requirement, CSMLS will issue an Eligibility Statement for the Certification Exam. This statement is valid for twelve months after the applicant's initial eligible examination date (included in their PLA report).

## Step 5 – Apply to the College of Medical Laboratory Technologists of Manitoba for a Conditional Certificate to Practice (Optional)

When an applicant is successful in the PLA process or has completed any required remedial training and is deemed eligible to write the CSMLS Certification Examination they can apply for a Conditional Certificate to Practice with the College of Medical Laboratory Technologists of Manitoba. Conditional registration allows individuals to work under direct on-site supervision until they pass the national certification exam – up to 14 months.

An application for a conditional certificate to practice involves the following:

- A current and complete CMLTM Renewal/Application form
- A first time application fee of \$100 and an annual registration fee of \$450
- An official sealed copy of the PLA Technical Report from CSMLS
- CSMLS letter of eligibility to write the MLT certification examination or entrance to exam letter
- A copy of Canadian government issued photo identification
- Criminal Record Check (and Vulnerable Sector Check)
- Child Abuse Registry Check
- Adult Abuse Registry Check

The following conditions apply:

- Applicants must practice Medical Laboratory Technology under the direct on-site supervision of a Medical Laboratory Technologist holding a valid Active Certificate to Practice in Manitoba
- Applicants may be referred to as a Medical Laboratory Technologist and use the title MLT in Manitoba

- Applicants must upgrade from a Conditional to an Active Certificate to Practice before beginning to practice Medical Laboratory Technology without direct supervision
- Applicants must sign a declaration stating they have not been found guilty of a criminal offence relevant to the practice of medical laboratory technology
- A Conditional Certificate to Practice is valid for 14 months or three attempts at the CSMLS MLT certification examination, whichever comes first

#### Step 6 – Complete the CSMLS Certification Examination

The Certification Examination consists of two parts; Part A is three hours and Part B is two and a half hours. Both are multiple choice formats. CSMLS offers a general MLT exam (\$720) and two speciality exams in clinical genetics (\$825) and diagnostic cytology (\$825). The exams are offered three times per year on fixed dates in February, June, and October. Examination results are sent to candidates by mail approximately six weeks after the examination date.

CSMLS policy allows candidates (domestic and internationally-trained) three examination attempts. After two consecutive failed attempts a candidate must complete a learning plan before the third and final attempt of the exam. CSMLS conducts a review of the examination results to identify areas of weakness and provides options to address the gap areas. Evidence of meeting the gaps must be provided to CSMLS prior to establishing exam eligibility for the final attempt. Candidates exceeding three exam attempts are no longer eligible to challenge the exam and must complete a full-time Medical Laboratory Technology or Assistant program to become eligible again to take a CSMLS certification exam.

Upon successful completion of the Certification Examination candidates are certified by CSMLS as Medical Laboratory Technologists.

### Step 7 – Apply to CMLTM for an Active Certificate to Practice

An application for an Active Certificate to Practice involves the following:

- A current and complete CMLTM Renewal/Application Form
- A first time application fee of \$100 and an annual registration fee of \$450
- CSMLS MLT Certification (Examination results and/or Certificate)
- An official sealed copy of the PLA Technical Report from CSMLS
- A copy of Canadian government issued photo identification
- Criminal Record Check (with Vulnerable Sector Check)
- Child Abuse Registry Check
- Adult Abuse Registry Check

If the applicant holds a valid Conditional Certificate to Practice, they need only submit their exam results and CMLTM will upgrade them to an Active Certificate to Practice without additional charge or paperwork.

#### Appeals

#### CMLTM

CMLTM registration decisions that deny or apply conditions to registration can be appealed to the CMLTM Council. Appeals must be launched by the applicant within 30 days of receipt of the decision and are heard by the CMLTM Council within 90 days of receiving the notice of appeal. Appellants are entitled to appear with counsel. A member of the board of assessors who is also a member of the council may participate in the hearing but cannot vote on a decision. Appeal decisions must be rendered within 90 days; unsatisfied appellants may take the matter to the Court of Queen's Bench.

There are no costs associated with the appeal process with CMLTM.

#### CSMLS

The CSMLS has an appeal process and an alternative document policy as part of the PLA process. Details can be found in the CSMLS PLA Handbook here: <a href="http://go.csmls.org/cert/MLT\_PLA\_Guidebook.pdf">http://go.csmls.org/cert/MLT\_PLA\_Guidebook.pdf</a>

#### **Time and Costs**

The time and cost for IEAs to become fully registered with CMLTM will vary depending on the circumstances of the applicant. CMSLS reports that over 80 per cent of internationally educated applicants need to complete some form of skills upgrading or education before they can write the national certification exam. They also state that "many individuals find the PLA process to be a long and challenging journey. It requires a time commitment between one to three years, before successfully writing the exam, with significant expense. For some applicants, many exam attempts may be required before a passing mark is achieved. Recent statistics show that only 37 per cent of internationally educated candidates pass the certification exam on their first attempt compared with 86 per cent of those educated in Canada." (Source: CSMLS Prior Learning Assessment Information Handbook and Application 2017)

The CMLTM reports that upon receiving completed applications with the required documentation, the final step of registration commonly takes one week or less.

Direct costs for IEAs found to have no learning gaps and who are successful on the first attempt of the certification exam are just over \$3,000. Costs increase significantly when applicants are required to complete learning plans and require multiple attempts at the certification exam.

## Direct Costs (2017)

### CSMLS

CSMLS membership fee	\$159 (encouraged as membership reduces fees associated with the CSMLS certification process)		
	Member	Non-Member	
PLA Online Self-Assessment	\$60	\$60	
PLA Application Fee	\$820	\$975	
PLA Technical Report Fee	\$720	\$875	
Certification Exams:	Member	Non-Member	Non-Resident
General MLT	\$720	\$950	\$1800
Clinical Genetics	\$825	\$1130	\$2160
Diagnostic Cytology	\$825	\$1130	\$2160
C N A I T N A			

\$100

### CMLTM

One Time Application Fee Annual Registration Fee

\$450 (First time applicants applying after June 1 in any year pay \$225)

## **State of Progress**

The College of Medical Laboratory Technologists of Manitoba has demonstrated a commitment to the fair assessment and recognition of internationally educated medical laboratory technologists.

Many aspects of CMLTM's registration practice for internationally educated medical laboratory technologists are progressive and CMLTM has taken steps improving its practice since the 2013 Registration Review.

CMLTM has improved its web information, developing an easy to navigate landing page for internationally educated medical laboratory technologists and introducing an audio based PowerPoint presentation as well as a summary document on the steps to registration and a document checklist to support applications. CMLTM makes clear the potential costs and length of the certification process and provides links to the Canadian Society of Medical Laboratory Technologists (CSMLS), bridging programs and other resources. Also now clear on their website is their criminal record policy and how individuals can access their records.

CMLTM has worked closely with key stakeholders over the years to support the success of the Manitoba Internationally Educated Medical Laboratory Technologist Bridging Program and to problem solve issues experienced by IEMLTs. They currently sit on a working group for the bridging program intended to improve the program experience for both participants and employers.

CMLTM has also shown commitment to the success of IEMLTs through its involvement in training of staff and its members for the delivery of the Professional Practice Seminar series developed collaboratively by the OMFC. This series of training seminars provides internationally educated professionals with an introduction to profession specific workplace culture and communication in Canada. CMLTM has co-delivered this series to IEMLTs and other internationally educated allied health professionals.

Internationally educated applicants to Manitoba benefit from the work CMLTM and other provincial regulatory authorities do to support their national body. CSMLS posts information about success rates of internationally educated applicants on the national certification exam. They acknowledge that pass rates are not as high for internationally educated applicants as they are for graduates of Canadian programs. CSMLS requires IEMLTs to compare their education and experience to what is expected in Canada before pursuing their certification process, and they provide the tools for applicants to do this. They also recently introduced a micro-site on alternate careers that provides information for applicants about professional fields related to medical laboratory technology.

## **Fair Practice Analysis**

The Fairness Commissioner has identified the need for timely and effective registration, the recognition of qualifications acquired through professional work experience and the need for supervised practice opportunities as key substantive issues critical to realize progress among Manitoba regulators.

Following the Manitoba Fairness Standard, the Fairness Commissioner has the following commendations, comments and concerns about CMLTM's state of progress concerning these key fairness issues:

#### **Timely Registration**

*The assessment and registration process is structured efficiently (Manitoba Fairness Standard, 7.1).* 

The assessment and registration process is periodically reviewed to ensure timeliness for internationally educated applicants (Manitoba Fairness Standard, 7.2).

Over 80 per cent of internationally educated applicants need to complete upgrading of skills or education before they can write the certification exam. Current certification exam pass rates for first time IEMLT test takers is 37 per cent. Those who are successful often take several years to complete the process at significant cost. This is made clear to IEMLTs on provincial and national body websites.

Before a potential applicant pursues the recognition process they are required to complete several self-assessments designed to help in determining the fit between their education and experience and what is expected in Canada. A 20-page competency profile for the profession is also provided. These tools help IEMLTs judge how similar/different the role of a medical laboratory technologist in Canada is to the one they had abroad.

A new micro website launched by CSMLS on alternate careers contains information on 11 different skilled professions for which a background in medical laboratory work may prepare people. This site may be particularly helpful in cases where education and experience is determined to be a poor fit for the field of medical laboratory technology in Canada, an individual is not willing or able to invest one to three years in the certification process or an individual would like to use their skills and experience in a different way.

The OMFC believes the above efforts to inform and educate IEMLTS about the practice of the profession in Canada, posting the success rates of IEMLTs in the certification process as well as alternatives will likely increase efficiencies. This is particularly true for individuals whose backgrounds are not a good fit for work as MLTs in Canada as it potentially dissuades them from spending significant time, energy and funds on a pathway they may ultimately find to be fruitless.

The PLA aspect of this process allows for the assessment of both formal education and skills acquired in the workplace and for individualised learning plans to be created. This approach also supports efficiency for those who decide to pursue the process as it lessens the incidence of repeating education in areas in which one is already proficient.

Additionally, CSMLS's policy surrounding language proficiency appears to support efficiency in process. Individuals can begin the process with a lower level of language than they must later demonstrate to be eligible to write the certification exam. This approach acknowledges that through the process of completing a learning plan (one to two years) individuals are likely to improve their English skills and it doesn't hold them back from beginning the certification process.

The Manitoba Internationally Educated Medical Laboratory Technologist Bridging Program also provides an efficient way for individuals to address gaps while working as medical laboratory assistants alongside MLTs. Manitoba has one of only three programs in Canada.

## *Communication with applicants is timely and systematic (Manitoba Fairness Standard, 7.3).*

Both CMLTM and CSMLS communicate with applicants in a timely and systematic manner.

# The registration process is such that qualified internationally educated applicants have an opportunity to practice in some capacity within a year of application (Manitoba Fairness Standard, 7.4).

Applicants whose training is found to be equivalent to the Canadian standard and who are not required to complete a learning plan can typically apply to Manitoba and begin work on a conditional certificate to practice in less than one year.

The majority of internationally educated applicants either have gaps that need to be addressed through a learning plan, or, gaps that are too great to address and must re-do their education before they will qualify to pursue the certification process. Individuals assigned a learning plan typically take upwards of one year before they qualify to practice on a conditional certificate.

Individuals accepted into the International Technologists Bridging Program offered by Diagnostic Services Manitoba can fulfill the learning plan requirement in about one year.

#### **Recognition of Professional Work Experience**

*Professional work experience is considered to determine qualification (Manitoba Fairness Standard, 5.10).* 

Regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience (Manitoba Fairness Standard, 5.11).

Through their Prior Learning Assessment Process, CSMLS considers professional work experience in determining qualification. The CSMLS Competency Profile is used as the national standard against which all applicants' are assessed. CSMLS considers employer letters outlining work responsibilities of applicants and cross references them with statements made by applicants in their PLA application and self-assessments.

## *If Canadian work experience is a mandatory requirement, it is clearly justified (Manitoba Fairness Standard, 5.12).*

There is no requirement for Canadian work experience in this certification process.

### Supervised Practice Opportunities

## *Supervised practice opportunities are available for the purpose of assessment and gap training (Manitoba Fairness Standard, 5.13).*

Internationally educated applicants can work under supervision on a Temporary Certificate to Practice once they are deemed eligible to sit the national certification examination.

Internationally educated applicants can also choose to complete a supervised clinical placement as a means of completing an assigned learning plan. In Manitoba, they would need to register with CMLTM as a student to be able to complete this period of supervised clinical placement. To date there have been no IEMLTs requesting registration as students for this purpose. CMLTM indicates that although documents have been created by CMSLS to support this approach, it would likely prove very difficult for an individual to find a licensed employer willing to provide the level of supervision and supports required for this type of arrangement.

The DSM bridging program includes 18 weeks of clinical rotation. To prepare for the lab techniques they have to perform during this rotation, participants complete a four-day lab intensive weekend in Hamilton, Ontario.

## **Additional Fairness Concerns**

CMLTM's website with its landing page for internationally educated medical laboratory technologists does an excellent job of providing applicants with step-by-step information about the certification process. The Steps to Registration Document and the Document Checklist as well as an audio based PowerPoint presentation support applicant understanding of the certification and registration process. A number of updates are required however as some information is out of date or links are broken or dead. A more detailed list of issues was shared at the Progress Meeting.

## **Progress Opportunities**

The Fairness Commissioner sees the following opportunities for progress regarding CMLTM's assessment and registration practice:

- 1. Update web information.
- 2. Continue to work with key stakeholders to increase capacity to support IEMLTS to address learning plans, to create opportunities for supervised practice and to address other areas of need identified by the bridging program working group.
- 3. Engage with CSMLS to obtain data to improve understanding of Manitoba IEMLT's experience in the national certification 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 Medical Laboratory Technologists of Manitoba take action regarding the above progress opportunities.

## College of Medical Laboratory Technologists of Manitoba – Action Plan

In response to the Fairness Commissioner's recommendation, CMLTM proposed the following Action Plan as of May 2017.

CMLTM's Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2017 Registration Review to discuss implementation of activities and updates to the Action Plan. Action Plan updates will be posted on the OMFC's website on an annual basis, following these meetings allowing any interested party to see the progress to date.

Pr	ogress Opportunity	Action(s)	<b>Completion Date</b>
1.	Update web information.	The current CMLTM website is being rebuilt and all information will be updated.	July 2017
2.	Continue to work with key stakeholders to increase capacity to support IEMLTs to address learning plans, to create opportunities for supervised practice and to address other areas of need identified by the bridging program working group.	Discuss the issue with RRC, MB Health, key stakeholders and possibly the Minister of Education and Training. CMLTM will continue to participate in the Manitoba Internationally Educated MLT (MIEMLT) bridging program working group. The group will continue to identify and support improvements to access and eventually outcomes for IEMLTs. The number clinical placements and access to structured supports are some of the keys to success for IEMLTs having their foreign qualifications and enter the profession in Manitoba.	September 2017
3.	Engage with CSMLS to obtain data to improve understanding of Manitoba IEMLTs experience in the national certification process.	Discuss the issue of IEA PLA data with CSMLS to find an efficient option to obtain the information on the time it takes an IEMLT to become registered with CMLTM (Start of PLA to registration and all milestones along the way).	July 2017

## **Action Plan Comments**

### **CMLTM Comments**

The website issues will be very easy to correct as CMLTM was in the process of re-designing and updating the website with a full review.

It will be very difficult to influence real change and create new opportunities for clinical experience.

Any new data mining would require a significant financial investment to develop the report. At this time CMLTM does not have the budget to develop a new report.

## **Statement of Compliance**

The College of Medical Laboratory Technologist's (CMLTM) Action Plan is a positive response to the progress opportunities identified in this review.

These actions support fair practice and align with the intent of *The Fair Registration Practices in Regulated Professions Act* to improve licensure processes for internationally educated applicants in Manitoba.

In Manitoba, the certification process for internationally educated medical laboratory technologists (IEMLTs) is impacted by a lack of capacity to meet the demand for bridge programming and supervised practice. Currently, IEMLTs who cannot access bridge programming must complete learning plans independently and do not benefit from supervised work placements while doing so.

CMLTM's commitment and actions to address this problem are encouraging. CMLTM sees the importance of the role IEMLTs can play to meet the current and identified future demand for certified practitioners.

Moving forward, CMLTM will be challenged to obtain the cooperation of key stakeholders to increase capacity to support IEMLT success. I will support and where appropriate help facilitate CMLTM's efforts.

I look forward to our future work and engagement.

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Ximena Munoz Manitoba Fairness Commissioner

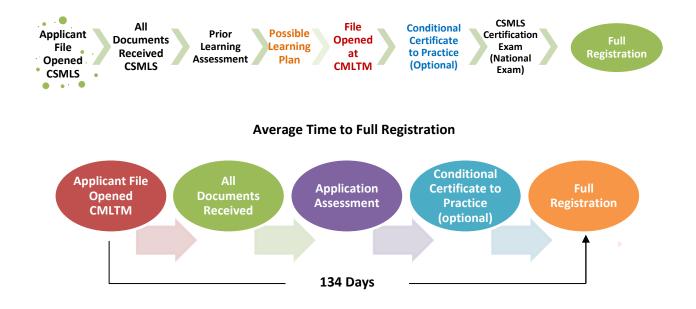
## Appendix I: 2011-2015 Registration Data

The College of Medical Laboratory Technologists of Manitoba reports annually to OMFC on the registration of internationally educated medical laboratory technologists to Manitoba. The OMFC will continue to work with CMLTM on the collection of registration data including the collection of relevant data from the Canadian Society for Medical Laboratory Sciences (CSMLS).

CMLTM received a total of 290 applications from 2011-2015. Among those, 21% were internationally educated applicants (IEAs). The top country of education was the Philippines with more than 63% of applicants, followed by those educated in India, Iran and Nigeria.

With regard to licensure outcomes, 70% of IEAs had obtained full registrations by the end of 2015.

The average time to full registration from when an application is opened by CMLTM was 134 days or about four and a half months. This timeline does not include the time it takes to apply to and be assessed by the Canadian Society for Medical Laboratory Sciences which precedes application to CMLTM.



Analysis of 2011 – 2015 regulator data on internationally educated applicants provided by the Manitoba Bureau of Statistics.

For additional context, immigrant landings for medical laboratory technologists to Manitoba for 2011–2015 indicate:

Year	Landings
2011	16
2012	15
2013	17
2014	13
2015	16
Totals	77

The NOC code associated with these landings is 3211 Medical Laboratory Technologists.

Source: Immigration, Refugees and Citizenship Canada. Prepared by Manitoba Education and Training.

## Appendix II: 2017 Registration Review Process

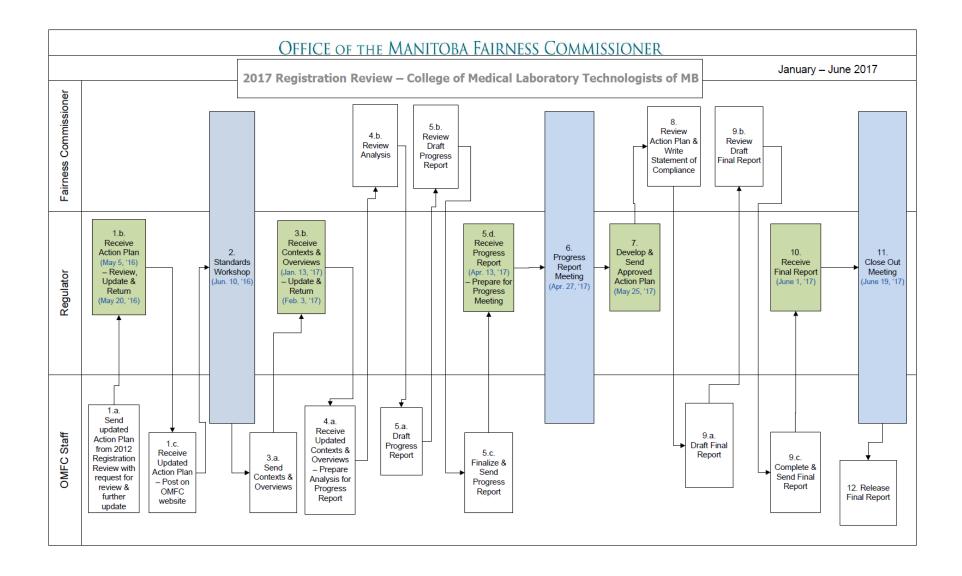
The OMFC's 2017 review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
Registration Review Workshop	<ul> <li>Group meeting between OMFC and regulators</li> <li>Latest data and research presented</li> <li>Fairness Standard, review focus and process presented</li> <li>Review schedule provided</li> </ul>	June 10, 2016
Progress Report	<ul> <li>CMLTM report on its fair practice progress</li> <li>Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities</li> <li>Progress opportunities identified</li> <li>Recommendation from Fairness Commissioner to address progress opportunities</li> </ul>	April 13, 2017
Progress Meeting	CMLTM and Fairness Commissioner discuss report and possible actions CMLTM is considering addressing progress opportunities	April 27, 2017
CMLTM Action Plan	CMLTM 's Action Plan submitted to OMFC	May 25, 2017
2017 Registration Review Report	<ul> <li>Report submitted to CMLTM</li> <li>Report contains the review findings, CMLTM 's Action Plan, and the Fairness Commissioner's Compliance Statement</li> </ul>	June 1, 2017
Registration Review Closeout Meeting	<ul> <li>CMLTM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how CMLTM 's Action Plan will inform the relationship moving forward</li> <li>Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Active Living and Seniors and uploaded on OMFC website</li> </ul>	June 19, 2017

### **Review participants:**

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