2017 Registration Review Report Manitoba Veterinary Medical Association

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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Executive Summary

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

Several aspects of the licensure process for internationally educated veterinarians (IEVs) are progressive. The Canadian Veterinary Medical Association, working with the American Veterinary Medical Association has accredited schools of veterinary medicine in nine countries. As a result, the pathway to recognition for graduates of these programs is straightforward and timely. As part of their national certification process, internationally educated veterinarians (IEVs) who are unsuccessful on exams benefit from diagnostic reports that provide feedback on areas of strengths and weaknesses and are helpful for future preparation work. Where candidates have failed three or fewer sections on the Clinical Proficiency Exam (a multiple-day, practical exam), it is possible to achieve partial credit and to re-do only those sections where a pass standing was not achieved. The Manitoba Veterinary Medical Association (MVMA) will grant a temporary license to IEVs before they complete the Clinical Proficiency Exam. This practice allows IEVs to work under supervision for up to two years and supports exam success by providing the option to practice veterinary medicine in Canada and allowing individuals to start to use their skills sooner. IEVs face a serious challenge to secure supervised practice opportunities and to obtain the breadth of exposure to Canadian practice that would support exam success. For those graduates from non-accredited programs the path to registration can be long and costly with the need for multiple exam attempts; real opportunities for supervised practice are critical.

The Fairness Commissioner identifies the need for ongoing work with key stakeholders to increase capacity to help IEVs to secure beneficial supervised practice opportunities and to offer necessary supports while on temporary license. She asks for significant web updates and for continued work to improve registration data collection. Finally, she advocates for changes to allow IEVs to obtain temporary license before clinical evaluations as they did prior to the January 2017 introduction of the new surgical assessment that is now a prerequisite to the Clinical Proficiency Exam.

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

- Making updates to its website
- Engaging in a process to help IEVs to secure practice opportunities and to provide supports to IEVs while on temporary license
- Advancing a by-law change that would allow IEVs to receive temporary license and begin supervised practice prior to completing the new Preliminary Surgical Assessment
- Collaboratively working to improve data collection including data from the CVMA.

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, MVMA'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 MVMA'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 Agriculture.

Context of the Profession in Manitoba

Veterinarians prevent, diagnose and treat diseases and disorders in animals. They advise clients on feeding, hygiene, housing and general care of animals. Veterinarians are employed in animal hospitals and clinics, laboratories, government and industry.

Manitoba is an economically and geographically diverse province with a variety of urban and rural environments. Because of this, the province supports many different types of veterinary practice. Small animal medicine is common in the capital city of Winnipeg and larger urban centres like Brandon. Outside of these areas, there is significant livestock farming requiring the expertise of veterinarians with experience in large animal medicine. Primary livestock types found in Manitoba include swine, beef and dairy cows and poultry with bison production on the increase. Horses are common throughout Manitoba.

Manitoba also has a variety of government food inspection and research agencies, including the Canadian Science Centre for Human and Animal Health, offices of the Canadian Food Inspection Agency and Manitoba Agriculture, Food, and Rural Initiatives, all of which employ veterinarians.

Currently, there are roughly 368 licensed veterinarians in Manitoba, including approximately 50 internationally educated veterinarians. Manitoba's internationally educated veterinarians work in a variety of areas of veterinary medicine including the federal and provincial governments in the fields of inspection, animal welfare and research and in large and small animal private practices. They bring a diverse range of professional experience and skills to Manitoba from which all benefit.

Canadian educational programs in Veterinary Medicine are offered only in Alberta, Ontario, Prince Edward Island, Quebec and Saskatchewan. All Manitoba licensed veterinarians are trained outside of the province and internationally educated veterinarians must travel to other provinces for the practical examinations that are part of the licensure process.

The Canadian Veterinary Medical Association (CVMA) works with the American Veterinary Medical Association (AVMA) to accredit schools of veterinary medicine. Outside of Canada and the US there are nine countries with programs accredited by the CVMA-MVMA. These are: Australia, England, France, Ireland, Mexico, The Netherlands, New Zealand, Scotland, St. Kitts and Grenada.

Overview of Assessment and Registration Process

The Manitoba Veterinary Medical Association (MVMA) regulates the practice of veterinary medicine in Manitoba under the authority of *The Veterinary Medical Act* (C.C.S.M. c. V30). Only persons licensed with the MVMA can practice veterinary medicine or use the title "veterinarian," or any variation thereof.

Qualifications

Although MVMA is also responsible for licensing veterinary technologists this review will focus only on the assessment and registration process as it pertains to internationally educated veterinarians (IEVs). The OMFC will work with MVMA in the future to learn more about its work with veterinary technologists.

Principal qualifications required for registration as a veterinarian include completion of an approved degree in veterinary medicine and a certificate of qualification from the Canadian Veterinary Medical Association demonstrating successful completion of required examinations.

Graduates of programs accredited by the American Veterinary Medical Association-Canadian Veterinary Medical Association (AVMA-CVMA) are eligible to apply to the MVMA for licensure upon receipt of a Certificate of Qualification from CVMA. To achieve this Certificate of Qualification, graduates of accredited programs must apply to the National Examining Board of the CVMA providing evidence of graduation from a qualifying degree program in veterinary medicine and successful completion of the North American Veterinary Licensing Examination (NAVLE).

Graduates of non-accredited programs must first apply to the National Examining Board of the CVMA and successfully complete the Basic and Clinical Sciences Exam (BCSE), the Preliminary Surgical Assessment (PSA) and the NAVLE. They can then register for the Clinical Proficiency Exam (CPE). Once registered, they have the option to apply to the MVMA for a temporary license to practice under supervision for a period of up to two years. To apply to MVMA for full licensure, they must obtain a Certificate of Qualification from the CVMA by also successfully completing the CPE.

Assessment and Registration Process

Assessment and registration is a two step process: first being assessed and certified by the National Examining Board of the Canadian Veterinary Medical Association – Certificate of Qualification – and then applying to and registering with the Manitoba Veterinary Medical Association.

Step 1 – Application to the Canadian Veterinary Medical Association

The application to the CVMA includes the following:

- Completed NEB Application Form
- \$525 fee. This fee covers the initial two-year period the file is open with CVMA. An annual fee of \$262.50 is payable after this period
- Original or notarised copy of the applicant's veterinary degree
- Proof of linguistic proficiency in English or French. For applicants whose first language is neither English nor French (some exceptions apply), an original copy of the score report no more than two years old is required
- Two recent identical passport size (70mm x 50mm) photographs of the applicant, signed by the applicant only if not able to upload a digital photograph using the online registration form
- Original or notarized copy of the official transcript of the academic record from the school of graduation
- Letter of recommendation from a licensing organization within the veterinary profession in the country of origin or, if not yet licensed, from an individual in the veterinary profession in addition to the letter in the point below
- Letter of recommendation from someone in the veterinary profession or a responsible citizen
- Official, government-issued identification such as a notarised copy of birth certificate or passport
- Surgical Experience Documentation. For candidates who registered with the NEB after January 1, 2015 only, this document is needed at the latest once they are ready to register for the Clinical Proficiency Examination
- NAVLE results Graduates of AVMA-CVMA accredited schools, who have already passed the NAVLE can transfer the results to CVMA using a dedicated system for this purpose

*If documents are not in English or French, notarized translations are required.

Pathway for Graduates of non-accredited programs

Step 2 – Basic and Clinical Sciences Examination (BCSE)

Graduates of non-accredited veterinary medicine degree programs must first write and pass the Basic and Clinical Sciences Exam. This is a computer-based, 220 minute, multiple choice exam that is designed to assess basic and clinical veterinary sciences knowledge of an entry to practice veterinarian.

To register to sit this exam, applicants must submit to the NEB an application form along with the required \$472.50 fee. Applicants are then sent an Authorization to Test (ATT) letter inviting them to book a testing date. Since the beginning of April 2012, the BCSE is offered at internationally located Prometric Testing Centers, including one in Winnipeg, on a continuous basis. Candidates are permitted to take the BCSE three times within a 12 month period.

A diagnostic report that provides information to help identify strengths and weaknesses of a candidate's performance in particular subject areas of the exam is provided to those who do not pass.

Step 3 – North American Veterinary Licensing Examination (NAVLE)

Applicants must complete the North American Veterinary Licensing Exam, the Preliminary Surgical Assessment (PSA) and the Clinical Proficiency Exam (CPE), however, once they have completed the PSA they can choose the order in which to complete the NAVLE and the CPE. In Manitoba, once an applicant has passed the NAVLE and is registered to sit the CPE, he/she can work under supervision on a temporary license. Many internationally educated veterinarians choose to complete the NAVLE first and to work in the field on a temporary license while preparing for the CPE.

The NAVLE is a multiple choice format exam consisting of 360 questions. This exam is designed to measure general knowledge of the various scientific disciplines required in veterinary medicine. This exam requires one full day to complete and is offered in Winnipeg by Prometric Testing Centre each April and November-December. The fee is \$1,050.

A candidate may not sit for the NAVLE more than five times during a five year period starting from the first attempt. Each of the final two attempts must be at least one year after the previous attempt. Candidates are required to wait for a period of one year following an unsuccessful fifth attempt and are strongly encouraged to undertake remedial training before applying for a further cycle of five attempts.

A diagnostic report with information to help identify strengths and weaknesses of a candidate's performance in particular subject areas of the exam is also provided to those who do not pass.

In preparation to sit this exam, candidates can complete a web-based self-assessment through the International Council for Veterinary Assessment. The assessment consists of 200 multiple-choice items, presented in four sections of 50 items each. It is available in English and French at a cost of \$50US. Free sample assessments are also available.

Step 4 – Preliminary Surgical Assessment (PSA)

The PSA was introduced in January 2017 as a mandatory pre-requisite to the Clinical Proficiency Examination. This is a qualifying exam that assesses candidates' ability to prepare themselves and a cadaver for a surgical procedure and to actually perform that procedure. The fee is \$1,050.

This exam is approximately 1.5 hours long and has 11 sections. Examiners spend 30 minutes after the exam with each candidate going over skill areas in need of improvement. Exam results and feedback on the tested skills are sent to candidates from the NEB office. To receive a pass standing, candidates must pass nine of the eleven sections of the exam. There is no limit to the number of times a candidate can take the PSA. This exam will likely be offered five to six times per year at several testing centres in Canada (currently Saskatchewan, Prince Edward Island and Quebec).

Step 5 – Apply to the Manitoba Veterinary Medical Association for a temporary license (optional)

Upon successful completion of the Basic and Clinical Sciences Exam, the Preliminary Surgical Assessment and the North American Veterinary Licensing Examination applicants who are registered for the CPE can apply to the Manitoba Veterinary Medical Association for a temporary license to practice.

A temporary license allows an applicant to practice under supervision of a licensed veterinarian for a period of up to two years. Candidates are required to make their own arrangements for supervision. An extension to this two-year period can be granted at the discretion of the MVMA Council.

Application for a temporary license involves the following:

- a completed application form
- \$1,307.80 MVMA fee (may be prorated)
- certified copy of degree of veterinary medicine
- NAVLE test results
- proof of registration for the CPE
- a head and shoulders identification photo
- evidence of practice liability insurance in an amount deemed reasonable by the scope of their practice
- a letter of standing from the regulating authority(ies) where the applicant was previously licensed

Step 6 – Clinical Proficiency Exam (CPE)

This is a practical examination of the candidate's medical and surgical skills. It is designed to assess the candidate's ability to handle actual medical, surgical and diagnostic problems in a clinical or hospital setting. The CPE involves the examination and treatment of live animals and the performance of routine laboratory procedures.

The CPE consists of seven sections. Each section requires between 45 minutes to four hours to complete, with the entire exam administered over a period of three to five days, depending on the exam administration site.

The CPE is offered in February, April/May, November and December in Guelph, Saskatoon, Charlottetown and Quebec. A limited number of candidates are tested during each session of the CPE. Candidates may be offered an alternative to their preferred test site and choose to complete the exam there or they may decide to wait for a later date to test at their site of choice. Registrations for this exam are received on a continuous basis. The fee is \$7,875.

Where candidates have failed three or fewer sections on this exam, it is possible to achieve partial credit and to re-do only those sections where a pass standing was not achieved. Candidates are permitted two attempts to retake failed sections. If they are not successful they must repeat the entire exam. The fee to retake each section is \$1,890. Applicants wishing to receive feedback for sections on which they were not successful can request a Summary Feedback Report for a fee of \$105 per section.

Candidates must successfully complete all four examinations within a seven year period commencing when they get approved to begin the exam sequence. Candidates who do not complete the exam sequence within the seven year period must repeat and submit scores of an English language proficiency exam and of the BCSE prior to again becoming eligible for the NAVLE, the PSA and the CPE.

All exams are available in English and French. Test results are typically received by candidates within 20 business days of test dates.

Step 7 – Apply to the Manitoba Veterinary Medical Association for full licensure

If the candidate is on a temporary license, application involves providing a copy of the NEB Certificate of Qualification.

If the candidate is not on a temporary license, application involves the submission of a copy of the NEB Certificate of Qualification along with the documents outlined above in Step 5.

All new members must participate in the MVMA's Annual Seminar and Exam at the next scheduled opportunity. The purpose of the Seminar/Examination is to familiarize new members with the relevant Acts, By-Laws, Code of Ethics,

regional conditions and provincial departments particular to Manitoba and to acquaint new members with MVMA's functions and responsibilities. New members must also attend MVMA's next scheduled Annual General Meeting.

Pathway for Graduates of accredited programs

Step 2 – North American Veterinary Licensing Examination (NAVLE) – if not yet completed

Many graduates of accredited degree programs will have passed the NAVLE prior to applying to the CVMA. Those who have achieved a pass result can transfer their results directly to the CVMA as part of their application for the NEB Certificate of Qualification.

Graduates of accredited programs who do not pass the NAVLE within two attempts are required to pass the PSA and the CPE to obtain their NEB Certificate of Qualification.

Step 3 – Apply to the Manitoba Veterinary Medical Association for full Licensure

Application for licensure involves the following:

- application for licensure form
- \$1,307 in MVMA fee (may be prorated)
- a photocopy of the University Diploma
- a head and shoulders identification photo
- a photocopy of the National Body Certificate of Qualification from the National Examining Board, or, if the applicant did not pass the NAVLE within two attempts and is applying for a temporary license, NAVLE results and proof of registration for the CPE
- a photocopy of membership cards held in other jurisdictions and a letter from the Registrar of the appropriate membership or licensing authority in the former jurisdiction, verifying the applicant's standing in the former jurisdiction
- a photocopy of the applicant's CVMA membership card
- evidence of practice liability insurance in an amount deemed reasonable by the scope of their practice
- a letter of standing from the regulating authority(ies) where the applicant was previously licensed

Upon completed application, the MVMA provides applicants with a written decision within two weeks.

Appeal Process

Following *The Veterinary Medical Act*, applications for registration denied or subject to condition can be appealed to council. Upon receipt of the registration decision, the applicant has 30 days to notify council and appeals are held within 90 days. Applicants are advised of their right of appeal in their letter denying them licensure.

Time and Cost

Graduates of veterinary degree programs accredited by the AVMA-CVMA who possess a Certificate of Qualification from the CVMA National Examining Board can register with the MVMA within two weeks of a completed application.

Graduates from non-accredited degree programs will face a much longer process. They must complete all four of the CVMA-NEB exams to receive the Certificate of Qualification making them eligible to apply for licensure with the MVMA. Although timeframes to licensure vary significantly depending on the circumstances of the applicant, well prepared candidates can complete CVMA-NEB exams within one year. Temporary licensure with the MVMA and entry to practice is possible upon successfully completing three of four NEB exams; for applicants who are able to find a supervising veterinarian this will shorten their time into professional practice.

Directs costs for registration with the MVMA range from approximately \$1,800 to \$12,500 plus; CVMA-NEB exams accounting for the difference. There are significant additional costs if NEB examination rewrites are required.

Direct Costs (2017):

Canadian Veterinary Medical Association costs:

CVMA Application Fee	\$525
CVMA Annual Fee payable every two years after initial	\$262.50
2-year period until registered with the MVMA	
Basic and Clinical Sciences Exam (BCSE)	\$472.50
North American Veterinary Licensing Exam (NAVLE)	\$1,050
Preliminary Surgical Assessment for the CPE (PSA)	\$1,050
Clinical Proficiency Exam (CPE)	\$7,875
Manitoba Veterinary Medical Association costs:	
MVMA registration fee (includes mandatory CVMA fee)	\$1,307

*Fees are subject to change without notice.

The cost to retake a section of the CPE is \$1,890. Summary Feedback Reports can be requested for sections of the CPE upon which candidates were unsuccessful for a cost of \$105 per section.

State of Progress

Opportunities for timely and effective licensure for internationally educated veterinarians in Manitoba are mixed.

For those coming from accredited degree programs in veterinary medicine, the registration process is straightforward, timely and effective. With similar education programs that prepare graduates for success on the NAVLE exam, registration often is simply a matter of completing applications to the appropriate bodies. These applicants typically are not required to complete the clinical exams (PSA and CPE) required for graduates of non-accredited programs.

For graduates of non-accredited programs the registration process is costly and often takes years to complete. Internationally educated veterinarians from these programs struggle to pass the profession's most in-depth clinical exam (CPE). Although Manitoba has legislation that allows eligible IEVs to work for a period of time under the supervision of a licensed veterinarian, IEVs have a difficult time finding veterinarians willing to supervise. There is little incentive and a lack of supports to do so. For IEVs, hands-on experience in the practice of the profession in Canada with feedback from an experienced practitioner is an important way to support preparation needed for success on exams and more timely entry to the profession through full licensure.

In January 2017, the CVMA introduced a second practical exam – the Preliminary Surgical Assessment as a pre-requisite for the Clinical Proficiency Exam. The OMFC understands that the exam was introduced in response to a significant decline over the last years in pass rates of IEVs on the surgery section of the CPE and out of concern for the live animals used in surgeries as well as a need to improve efficiency of the exam process. Although the Preliminary Surgical Assessment is an opportunity for feedback on how one prepares for surgery and the execution of the procedure itself, IEVs licensing in Manitoba must now also pass this exam before they can have an opportunity to practice under supervision on a temporary license. This is a costly exam, also requiring out-of-province travel. Preparation supports for Manitoba IEVs are needed.

Since the 2013 Registration Review, the MVMA has taken few steps to address actions it identified as important to improving practices that relate to the assessment and registration of IEVs. For example, during the 2013 review the MVMA identified the need to improve its information. The Association acknowledged that very little information was available on their website and that IEVs would benefit greatly from a step-by-step description of the registration process and its requirements. Despite offers of financial resources and expertise for the development of resources, MVMA's web information has not improved and there is no link to CVMA's website where details of the first steps in the registration process are provided.

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 MVMA'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 for IEVs from accredited degree programs is efficient, involving an application to the national body and upon approval, an application to the provincial regulator.

IEVs from non-accredited programs face a series of four exams once academically qualified by the national body. Two of these exams can be written in Manitoba and sittings are now available at computerised test centres allowing for greater flexibility for applicants and contributing to efficiency of process. There are two clinical exams, however, that must be written out-of-province. Limited capacity can result in wait lists and delays. The fact that Manitoba does not have a veterinary medical degree program is a significant factor. Had we a program, there would be potential for exams to occur in-province.

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

The Preliminary Surgical Assessment was introduced partly in an effort to improve efficiency of the certification process for IEVs. Candidates were often unsuccessful on the surgical section of the Clinical Proficiency Exam and after two repeated failures of this section were having to re-take the exam in its entirety. There is hope that feedback from examiners of the PSA, and opportunities to complete a surgery outside of the CPE, will improve success on the surgical section of the CPE and candidates will not be faced with the same degree of repeat attempts.

The OMFC is unclear as to how often the registration process is reviewed by the MVMA for timeliness for IEVs. We hope to learn more about this at the upcoming progress meeting.

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

Both the CVMA and the MVMA communicate with applicants in a timely 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).

Internationally educated veterinarians from accredited programs can be working in the profession in well under one year. Well prepared IEVs from non-accredited programs can complete the process within one year. However, it is not atypical for internationally educated veterinarians from non-accredited programs to experience a much longer registration process due to the need for repeated exam attempts. And, unless they are able to secure an opportunity to practice under supervision, it is likely to take them longer than one year to begin to practice in the field.

Recognition of Professional Work Experience

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

Neither the Canadian nor the Manitoban Association considers professional work experience in their assessment of IEVs to supplement the assessment of academic qualifications; or reduce or waive exams and assessment requirements.

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

The practical examinations in this registration process allow individuals to demonstrate what they have learned and can do concerning key tasks and competencies required for Canadian veterinary practice.

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 registration process.

Supervised Practice Opportunities

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

For applicants from non-accredited degree programs, temporary licensure is available upon completion of three of the four required examinations under the supervision of a licensed veterinarian. However, IEVs struggle to secure these opportunities and there is little incentive or support for licensed veterinarians to take on a supervisory role. Moreover, this period of temporary licensure, although supervised, has not been used to date as an opportunity to assess

applicants or address *identified* gaps. That said, practice under supervision is likely to expose IEVs to aspects of Canadian veterinary practice they may not have had exposure to in their home countries and, in the end, be a means of addressing gaps.

The OMFC understands that supervised practice opportunities IEVs do manage to obtain do not always provide exposure to the breadth of veterinary practice areas that are tested in practical licensing exams. It is believed that IEVs would greatly benefit from more practice diversity while on temporary licensure.

Additional Fairness Concerns

- 1. Applicants are provided clear, complete, accurate and easy to find information about:
 - 1.1 the steps involved in the registration process
 - 1.2 the role of third-parties in the assessment and registration process
 - 1.3 what can be done to prepare for registration before migration
 - 1.4 qualification requirements
 - 1.5 criteria used to assess qualifications
 - 1.6 documentation requirements
 - 1.7 alternative documentation opportunities
 - 1.8 fees and common associated costs
 - *1.9 the length of time registration processes usually take*
 - 1.10 key dates and timelines
 - 1.11 supports the regulator provides or other available supports of which the regulator is aware
 - 1.12 appeal process, timelines and fees
 - 1.13 access to records

The Manitoba Veterinary Medical Association is lacking clear, complete and accurate information regarding the above elements of the fairness standard. The Canadian Veterinary Medical Association provides thorough and detailed information on its website about the certification process for which it is responsible. The MVMA's information should be complementary, highlighting useful resources and making explicit anything pertaining to provincial processes. MVMA should have a landing page for IEVs with navigation following OMFC's recommended site map and adhering to principles of plain language.

Progress Opportunities

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

- 1. Improve information regarding assessment and registration processes for IEVs and work with the Canadian Veterinary Medical Association to ensure information meets fairness requirements.
- 2. Provide supports to IEVs in Manitoba to secure supervised practice opportunities that provide a sufficient breath of practice exposure to support success in clinical exams.
- 3. Develop supports for IEVs on temporary licensure seeking supervision as well as for IEVs already in supervised practice arrangements.
- 4. Consider changes that would allow IEVs to obtain temporary licenses prior to successful completion of the Preliminary Surgical Assessment (PSA).
- 5. Engage with CVMA to obtain data to improve understanding of Manitoba IEV'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 Manitoba Veterinary Medical Association's take action regarding the above progress opportunities.

Manitoba Veterinary Medical Association – Action Plan

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

MVMA'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.

Progress Opportunity	Action(s)	Completion Date
1. Improve information regarding assessment and registration processes for IEVs and work with the Canadian Veterinary Medical Association to ensure information meets fairness requirements.	The MVMA will update its website for ease of understanding and add links to CVMA - NEB website for the IEVS. The MVMA will review the standards guide in relation to creation of the web-page.	December 2017
2. Provide supports to IEVs in Manitoba to secure supervised practice opportunities that provide a sufficient breath of practice exposure to support success in clinical exams.	To begin the process - the MVMA will canvass its veterinary members and veterinary clinics to see if any clinics will volunteer to provide practice opportunities for IEVs in Manitoba to support success in clinical exams. Should a list of veterinary a members and clinics be generated then the MVMA will make it available for IEVs registered with	June 30 2017 In future
3. Develop supports for IEVs on temporary licensure seeking supervision as well as for IEVs already in supervised practice arrangements.	the MVMA as a restricted licence. To begin the process - the MVMA will canvass its veterinary members and veterinary clinics to see if any clinics will volunteer to provide practice opportunities for IEVs in Manitoba to support success in clinical exams. Should a list of veterinary a members and clinics be generated then the MVMA will make it available for IEVs registered with the MVMA as a restricted licence.	June 30 2017 In future

Progress Opportunity	Action(s)	Completion Date
	Once established, IEVs with a restricted license will be able to access MVMA mentorship program.	In future
4. Consider changes that would allow IEVs to obtain temporary licenses prior to successful completion of the Preliminary Surgical Assessment (PSA).	The MVMA Council reviewed this suggestion and have agreed to support a change in the existing by-law that would state that a person who has successfully completed the BCSE and NAVLE exam and is registered for the PSA would be eligible to apply for a restricted licence and registration. This change would be presented to membership for a vote at the next AGM in February 2018	February 2018
5. Engage with CVMA to obtain data to improve understanding of Manitoba IEV's experience in the national certification process.	The MVMA will request CVMA-NEB for statistics on national certification process and how well self-declared internationally trained veterinarians who state that Manitoba is their home province do in the program. Further information sought may include how many of these individuals are not successful in the program; and what is the country of origin for these individuals.	December 2017

Statement of Compliance

Aspects of the Manitoba Veterinary Medical Association's Action Plan represent a positive response to the progress opportunities identified in this report. Improvements to their information package and the request for a by-law change are needed improvements.

However, I believe these activities will not address the key issue raised in this report, the lack of supervised practice opportunities. To be successful, many internationally educated veterinarians need exposure to a necessary breadth of Canadian veterinary practice.

I am concerned MVMA's proposed action to canvass their members for their willingness to offer supervised practice opportunities does not go far enough. More needs to be done. I call upon the profession to take a serious look at how the current system is supporting their unlicensed colleagues and to find solutions that will result in their success. I believe a leadership role with significant effort from MVMA is needed. Where appropriate, I am happy to engage with MVMA and the profession to support addressing the critical issues.

I look forward to working more closely with MVMA going forward and will be monitoring the impact of their commitments. I am confident that key stakeholders working together will result in more success for internationally educated veterinarians.

The

Ximena Munoz Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

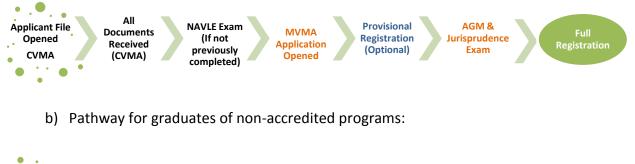
The Manitoba Veterinary Medical Association reports annually to OMFC on the registration of internationally educated veterinarians to Manitoba. The OMFC will continue to work with MVMA on the collection of registration data including the collection of relevant data from the Canadian Veterinary Medical Association (CVMA).

MVMA received 135 total applications from 2011-2015. Among those, 46 or almost 34% were internationally educated applicants (IEAs).

Those 46 IEAs had education from 17 different countries. The top country of education was the United States of America, followed by those educated in India and the Philippines.

With regard to licensure outcomes, 16 of the 46 IEAs obtained full registrations by the end of 2015. Of the remaining applicants were either provisionally registered (granted a temporary license), had withdrawn or been rejected, or were still in process.

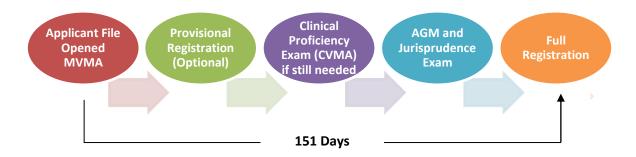
a) Pathway for graduates of accredited programs:





For those 16 IEAs who obtained full registration, the average time to do so upon all application documents received by MVMA was 151 calendar days, or about five months. This timeline does not include the time is takes to apply to the Canadian Veterinary Medical Association for credentialing and to complete initial requirements which precede application to MVMA.

Average Time to Full Registration



The shortest time from when an IEA's application documents were received by MVMA to when full registration was obtained was 1 day, while the longest time was over three years.

Analysis of 2011-2105 regulator data on internationally educated applicants provided by the Manitoba Bureau of Statistics.

For additional context, there were 14 immigrant landings for veterinarians to Manitoba from 2011 to 2015.

The NOC code associated with these landings is 3114 Veterinarians.

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

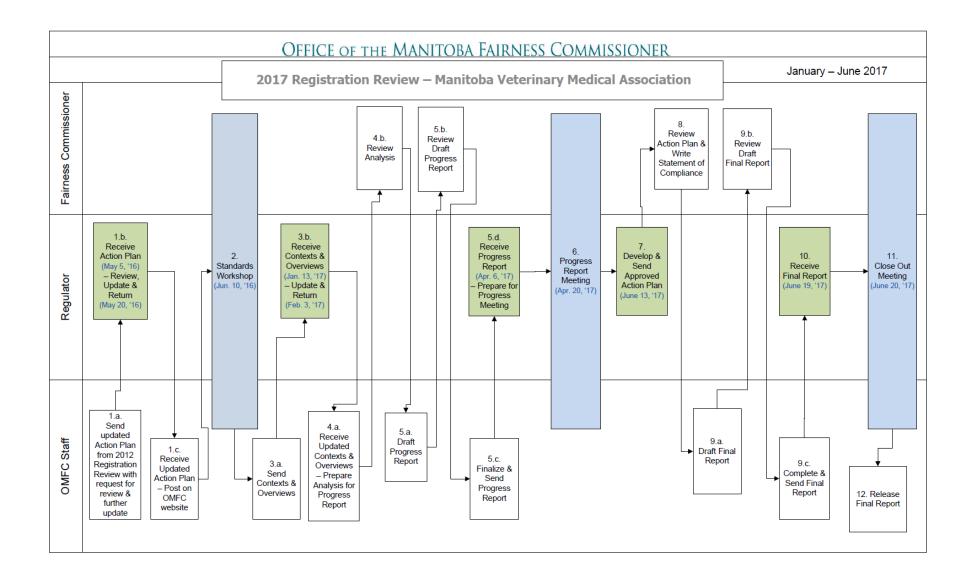
Appendix II: 2017 Registration Review Process

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	 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	 MVMA report on its fair practice progress Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities Progress opportunities identified Recommendation from Fairness Commissioner to address progress opportunities 	April 6, 2017
Progress Meeting	MVMA and Fairness Commissioner discuss report and possible actions MVMA is considering addressing progress opportunities	April 20, 2017
MVMA Action Plan	MVMA 's Action Plan submitted to OMFC	June 13, 2017
2017 Registration Review Report	 Report submitted to MVMA Report contains the review findings, MVMA's Action Plan, and the Fairness Commissioner's Compliance Statement 	June 19, 2017
Registration Review Closeout Meeting	 MVMA and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions & MVMA's action plan will inform the relationship moving forward Registration Review Report submitted to Minister of Education and Training, the Minister of Agriculture and uploaded on OMFC website 	June 20, 2016

Review participants:

Dr. Richard Hodges, President, MVMA Andrea Lear, Executive Director, MVMA Michelle Martin-Strong, Registrar, MVMA



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