

2017 Registration Review Report Manitoba Association of Registered Respiratory Therapists



OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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Executive Summary

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

Many aspects of MARRT's licensure process for internationally educated respiratory therapists are progressive. MARRT has worked with other provincial regulators to develop a structured interview and practical style examination for the assessment of internationally educated applicants (IEA). This assessment is conducted in Ontario by the College of Respiratory Therapists of Ontario, however, the first part, a structured interview, can be completed via teleconference so that applicants do not have to incur travel costs until they are certain they will proceed with the assessment. MARRT allows qualified IEAs to work on a Conditional License once initial criteria are met and while preparing for the licensing examination. This is an important way to assist new practitioners, including IEAs, to be successful in the profession.

The Fairness Commissioner calls for MARRT to work with key stakeholders in Manitoba to develop opportunities for remediation for IEAs who are assessed as having fillable gaps. Currently, few opportunities exist in Canada for remediation in this field and there are no opportunities in Manitoba. The Fairness Commissioner also sees a need for improvements to MARRT's web and print information for IEAs and continued work on registration data collection.

In response to the progress opportunities identified by the Fairness Commissioner, MARRT commits to working towards the creation of remediation opportunities by co-ordinating discussions with managers of respiratory therapy within tertiary care hospitals, the Faculty of Respiratory Therapy at the University of Manitoba, and other allied health regulators. In these discussions MARRT will also explore opportunities to create a working group to address similar challenges across professions. MARRT has also committed to improving its web and print information, finalizing policies pertaining to IEA, and ongoing work on data collection.

The Fairness Commissioner sees MARRT's Action Plan as a positive response to the progress opportunities.

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, MARRT'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 MARRT'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

Respiratory Therapy can be defined as: "An allied health profession devoted to the scientific application of technology and therapeutics, to assist in the diagnosis, treatment, and promotion of wellbeing of patients with respiratory disorders". Respiratory Therapists work in teaching and community hospitals, chronic care facilities, home care, medical supply companies, pulmonary function laboratories, community health agencies and research facilities.

The education program offered in Manitoba is a four-year, university based Bachelor Degree in the Faculty of Rehabilitative Medicine, University of Manitoba that starts after one year of general university coursework and includes 42 weeks of clinical experience. This differs from most of the educational programs in Canada, which are generally college-based programs providing a diploma upon graduation.

Between 2012-2015 MARRT received 75 domestically and internationally educated applicants. All of their internationally educated applicants (IEA) received their training in the United States. To date, 25 per cent of these IEAs have obtained full registration with MARRT. As US based programs don't commonly include instruction in the areas of Airway Management and Neonatology, this group commonly requires upgrading. US programs are also typically didactic in nature and do not include clinical experience. To help Canadian regulators better understand the differences in programs, the National Alliance of Respiratory Therapy Regulatory Bodies has recently applied to the federal government for funding to conduct a gap analysis of US and Canadian programs.

Prior to 2015, MARRT referred IEAs to learning assessments at two different sites in other Canadian provinces. These assessments were costly and proved to be unsustainable. As a result, MARRT and other provincial regulators worked collaboratively with the College of Respiratory Therapists of Ontario (CRTO) on the development of a competency-based assessment for their profession. In 2015-2016 CRTO began conducting assessments for all Canadian provinces except Alberta and Quebec. MARRT has made arrangements with CRTO to conduct the first part of this assessment, a structured interview, via Skype so that Manitoba applicants do not have to incur travel and other expenses associated with going to Toronto until they receive initial feedback and are certain they want to continue with the second part, practical assessment.

MARRT has not yet had an opportunity to refer an IEA to CRTO for assessment. However, with differences between Canadian and international educational programs in respiratory therapy they are anticipating the likelihood of applicants requiring remediation and have begun making plans to develop gap training options in Manitoba.

Overview of Assessment and Registration Process

The Manitoba Association of Registered Respiratory Therapists (MARRT) regulates the practice of respiratory therapy in Manitoba under the authority of the *Registered Respiratory Therapists Act* (C.C.S.M. c. R115) and Regulation (342/88 and 237/2006). Respiratory therapists licensed by MARRT receive the right to practice in Manitoba and the exclusive use of the title Registered Respiratory Therapist (RRT).

Qualifications

Principal qualifications required for registration as a registered respiratory therapist involve graduating from an educational program accredited by the Council on Accreditation for Respiratory Therapy Education ¹, or a program accredited by another organization acceptable to MARRT, and successfully writing either the Canadian Board for Respiratory Care's (CBRC) national entry-to-practice exam *or* Quebec's Épreuve Synthèse.

Internationally educated applicants whose education is not deemed substantially equivalent to an accredited program may be required to complete a learning assessment through the College of Respiratory Therapists of Ontario (CRTO). This assessment compares an applicant's knowledge, skills, judgement and experience, acquired through both education and employment, to the competencies outlined in the National Competency Framework for respiratory therapy. It consists of a structured interview and a clinical skills assessment. Depending on the results, IEAs may be required to complete additional training before proceeding to the final requirement, the national entry-to-practice exam.

Assessment and Registration Process

Step 1 – Complete the Self-Assessment Readiness Tool for Respiratory Therapists and Review the National Competency Profile

By May 2018, it will be mandatory for IEAs to work through the [Self-Assessment Readiness Tool](#) developed by Atlantic Connection. This online reflective tool is designed to help IEAs determine their readiness to pursue licensure in their regulated profession in Canada. Applicants are also encouraged to review Part I of the profession's [National Competency Framework](#). This document outlines national standards of competencies required for entry-to-practice.

¹ By May 2019, the Council on Accreditation for Respiratory Therapy Education will no longer serve as the accrediting body for educational programs in the profession. The National Alliance of Respiratory Therapy Regulatory Bodies is currently in the process of identifying a new organization to accredit educational programs in Canada.

Step 2 – Apply to the Manitoba Association of Registered Respiratory Therapists

IEAs first apply to MARRT. Applicants complete an online application form, pay a \$60 application fee and supply the following documents:

- official copies of certificate(s), diploma(s), or degree(s) attained sent directly from the applicant's education institution
- official transcripts sent directly from the applicant's education institution
- a course-by-course academic credentials report from a member agency of the Alliance of Credential Evaluation Services of Canada
- proof of registration or eligibility to be registered as a respiratory therapist in the applicant's country of origin
- proof of eligibility to work in Canada
- proof of legal name change (if applicable)
- verification of work history indicating at least 720 hours in the past four years (all applicants except new graduates)
- resume that includes employment history related to respiratory therapy
- English language proficiency test results submitted directly to MARRT from the testing agency
- criminal record check for time applicant is in Canada

Documents that are not in English must be translated.

MARRT's registration committee reviews the completed application and documentation and makes a recommendation to their board of directors.

If the board determines the applicant's education is not substantially equivalent to that provided by an accredited Canadian program, he/she first proceeds to Step 3 – Learning Assessment conducted by the College of Respiratory Therapists of Ontario.

If the board determines the applicant's education is substantially equivalent to that provided by an accredited Canadian program, they proceed to Step 4 where they can work on a conditional license while preparing for the Canadian Board for Respiratory Care – national respiratory therapy entry-to-practice examination.

Step 3 – Complete the Learning Assessment conducted by the College of Respiratory Therapists of Ontario (CRO)

The learning assessment consists of a structured interview and a clinical skills assessment.

The structured interview compares an applicant's knowledge, skills and experience, acquired through both education and employment, against the competencies listed in the National Competency Framework. It is administered at the CRO office by two trained interviewers who have broad experience and expertise in the practice

of respiratory therapy in Ontario. Arrangements may be made for the interview to be conducted via teleconference with the applicant in Manitoba under the supervision of MARRT. After the interview, the applicant receives summary comments on their assessment results. This feedback helps the applicant to determine whether to proceed with the clinical skills assessment or to withdraw from the assessment and consider alternatives. The fee for the structured interview is \$500.

The clinical skills assessment requires an applicant to demonstrate their ability to safely and effectively apply practical skills and clinical reasoning in clinical simulations at an entry-to-practice level. Applicants are also assessed on their communication skills, professionalism, clinical problem solving and health and safety. This assessment is conducted by a CRTO approved simulation facility in Toronto and is offered on an as needed basis. The fee for the CSA is \$2,750.

The learning assessment results are evaluated by MARRT to determine whether the applicant meets the Canadian standard or requires partial or complete retraining. Currently in Manitoba, remediation opportunities are a challenge in this profession. Applicants who fully meet standard or who complete any requisite out-of-province remedial coursework are deemed eligible by MARRT to write the national entry-to-practice exam.

Step 4 – Practice on a Conditional License

Applicants who successfully complete the learning assessment, and partial retraining if required, will be granted a conditional license to practice from MARRT. Applicants can be on a conditional license for up to 18 months while they prepare for and complete the national entry-to-practice exam. Working on a conditional license for a period of time is mandatory. It provides IEAs with exposure to the practice of the profession in Canada and supports exam preparation. While on conditional license, applicants cannot work alone, take verbal orders or supervise students. The annual fee to be on this register is \$450 (prorated after June).

Step 5 – Complete the Canadian Board for Respiratory Care (CRBC) – National Respiratory Therapy Entry-to-Practice Examination

The national entry-to-practice exam is comprised of two parts, two and four hours respectively. It is computer based and multiple-choice format. The exam evaluates foundational knowledge of respiratory care as defined by the National Competency Profile. The exam is offered in January and July at various centres across the country, including Winnipeg. Applicants may take this exam up to three times. The fee is \$815 plus provincial tax. Successful completion of the national entry-to-practice exam results in CRBC certification.

The CBRC Examination Development and Review Committee has developed an online practice examination to allow candidates to become familiar with the style, format and type of questions that appear on the entry-to-practice exam. It is administered on the same computer based exam platform and can be written from a home computer. The cost is \$50.

Step 6 – Apply to MARRT for Full Registration

Upon CRBC certification, applicants apply to MARRT for full registration as Active Practicing Members. The annual registration fee is \$450.

Appeal Process

Following *The Registered Respiratory Therapists Act*, registration decisions that deny or subject registration to condition can be appealed to MARRT's board of directors. Written notification must be provided by the appellant within 30 days of the decision. Appeals hearings are held within 30 days of notification. Appeal information accompanies MARRT's registration and assessment decisions.

Time and Cost

The time and cost to register with MARRT will vary depending on the circumstances of the applicant. IEAs required to undergo an assessment by the College of Respiratory Therapists of Ontario will face much longer time and higher expense. To date, assessments have determined that most IEAs require additional, remedial coursework before they are deemed eligible to write the national entry-to-practice exam. This means that a time range of two to four years is a realistic estimate of how long the process takes for most IEAs.

Costs can vary significantly for IEAs. Direct costs are approximately \$2,250 not including the learning assessment by the CRTO, which is determined on a case-by-case basis by MARRT. For those requiring the learning assessment, there can be significant associated costs for out-of-province travel. Costs can potentially increase by thousands of dollars if remedial academic coursework or other kinds of remediation are required.

2017 Fees

MARRT application	\$60
Credential assessment	\$245
Language proficiency test	\$200 – \$500
CRTO – structured interview	\$500
CRTO – clinical skills assessment	\$2,750
CBRC examination	\$900
MARRT conditional license to practice (annual)	\$450
MARRT full license to practice (annual)	\$450
Professional liability insurance	\$46

State of Progress

The Manitoba Association of Registered Respiratory Therapists (MARRT) is committed to the fair assessment and recognition of internationally educated applicants. MARRT partners with the College of Respiratory Therapists in Ontario for the delivery of a practical assessment of IEAs with education that is deemed not to be substantially equivalent to an accredited Canadian program. Practical assessments allow for recognition of formal learning as well as on-the-job learning from previous professional work experience. They lend themselves well to assessing applicants when they fall short on academic requirements. Practical assessments are a best practice and MARRT is to be commended for including this progressive approach in their assessment process for IEAs.

Depending on the results of this practical assessment, IEAs may be asked to complete remedial training. It is also a progressive practice to require applicants to retrain only in areas where they fall short of the standard. Currently, there are no opportunities for remediation in Manitoba and few formal opportunities in other provinces. MARRT's challenge will be to work with other relevant stakeholders in the province to establish a practical, cost effective and accessible approach for remediation for IEAs. Given that the majority of IEAs are in need of some level of gap training, this will be essential if MARRT is to make use of the skills and experience internationally educated respiratory therapists bring to Manitoba.

Once an IEA's academics have been deemed substantially equivalent, they can practice on a conditional register for up to 18 months while they prepare for and write the national entry-to practice exam. Exposure to practice in a Canadian environment is likely to support exam success. Conditional registration opportunities also support a timely return to practice for IEAs and help individuals maintain their skills.

2012 Registration Review and Recent Progress

MARRT made numerous commitments in their action plan in follow-up to the compliance issues identified through the 2013 Registration Review. These included:

- upgrades to MARRT's website in regards to information and resources for internationally educated applicants
- improved communication throughout the registration process
- provision of information regarding MARRT's policies surrounding document translation
- implementation of a strategy for document verification
- improved assessment of applicant competencies
- development of formal policies for various aspects of the assessment and recognition of IEAs such as tracking communications, writing outcome statements, presenting appeal information, outlining next steps and options, etc.

The OMFC subsequently provided funding to MARRT in 2013 to develop a designated landing page on their website for internationally educated applicants. This new page was to provide step-by-step information on the application and assessment process, documentation and other requirements, as well as links to application forms and helpful resources.

Since the 2013 Registration Review MARRT has partnered with the College of Respiratory Therapists of Ontario who now conducts the learning assessment of Manitoba IEAs with education that is not deemed substantially equivalent to a Canadian accredited program. Along with Ontario and other jurisdictions, MARRT supported the development of practice specific scenarios for use in this competency assessment. They have identified language proficiency requirements for their profession and determined acceptable language assessments. MARRT has improved its ability to verify international credentials by incorporating the use of services of members of the Alliance of Credential Evaluation Services of Canada. MARRT has also met with the University of Manitoba to explore the potential for IEAs to participate in clinical component of their educational program. More discussions are required and other stakeholder involvement may be necessary.

Between 2012-2015, MARRT received a total of 75 applicants. Ninety-six per cent of their domestically educated applicants were fully registered in this period and four per cent were provisionally registered. In comparison, only 25 per cent of internationally educated applicants were registered in this period with no conditional registrations.

Outstanding Fairness Concerns

Of significant concern is MARRT's website. Despite the provision of funding for the development of pages targeted to IEAs, their website lacks proposed navigation, information and resources. We understand that MARRT has developed content and that they anticipated it being uploaded in August 2016. Provision of information regarding assessment and registration processes is a key element of OMFC's fairness standard, as follows.

Regulators must provide information that is clear, complete, accurate and easy to find 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

In its 2013 Action Plan MARRT also committed to developing formal policies pertaining to the steps involved in the assessment and registration process of IEAs. An update on this was not provided in 2016 when Action Plan updates were requested and it appears that these commitments were not completed.

Progress Opportunities

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

1. Work with other stakeholders in the health professions, including the University of Manitoba on a plan for the development of remediation opportunities for IEAs in Manitoba.
2. Improve website and print information for IEAs addressing issues identified in this report and any missing criteria outlined in element number one of the Fairness Standard Guide.
3. Continue to work with the OMFC to improve data collection to help ensure a strong, fact-based understanding of timelines and outcomes for internationally educated applicants in Manitoba.

Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that the Manitoba Association of Registered Respiratory Therapists (MARRT) take action regarding these progress opportunities.

Manitoba Association of Registered Respiratory Therapists – Action Plan

In response to the Fairness Commissioner’s recommendation, MARRT proposed the following Action Plan as of December 2017.

MARRT’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
<p>1. Work with other stakeholders in the health professions, including the University of Manitoba on a plan for the development of remediation opportunities for IEAs in Manitoba.</p>	<p>The two tertiary sites in Winnipeg offer the best opportunity for remediation of IEAS at a clinical level. Meetings will occur with the Managers of these two sites to further develop this idea.</p>	<p>April 2018</p>
	<p>With the clinical sites availability for additional training it will involve communication with the Respiratory Therapy faculty at the University to assist in scheduling.</p>	<p>May 2018</p>
	<p>With MARRT being a member of the College of Rehabilitative Sciences College Council there is possibility for collaboration with two other health professions, specifically Physiotherapy and Occupational Therapy. In January MARRT will begin sharing office space at the Manitoba College of Physiotherapists. This offers increased potential to communicate and develop a collective proposal on remediation opportunities for IEA’s. This will require initial meetings over the next few months to determine interest in collaboration as we discuss the idea of creating a working group to work towards this progress opportunity. If there is a desire to work together on this, it will be presented at the college council meeting.</p>	<p>June 2018</p>
	<p>If the Motion to create a working group to further develop the opportunity passes it</p>	<p>June 2019</p>

Progress Opportunity	Action(s)	Completion Date
	<p>will proceed to create the business plan for presentation to college council.</p> <p>If accepted there is potential for enrollment in the following year since the selection process of students will have been completed for the September 2019 cohort.</p>	September 2020
<p>2. Improve website and print information for IEAs addressing issues identified in this report and any missing criteria outlined in element number one of the Fairness Standard Guide.</p>	<p>MARRT has identified its need to update and improve our website overall. Included in this plan is to finalize the uploading of the necessary information related to assessment of IEA's. The final details with the Assessment provider will be worked out over the next few months.</p> <p>The corresponding policies to be completed as well and available in print form for the IEA's to access.</p>	<p>May 2018</p> <p>September 2018</p>
<p>3. Continue to work with the OMFC to improve data collection to help ensure a strong, fact-based understanding of timelines and outcomes for internationally educated applicants in Manitoba.</p>	<p>The website that MARRT uses is very data base entry customizable. Working with the OMFC and our provider enables us to capture the required data as it is communicated to us. Currently all interaction with IEA's is time stamped offering the potential for defensible statistics in regard to timelines and outcomes.</p> <p>Much of this also hinges on the future upgrade of the database.</p>	Ongoing as required

MARRT Comments

MARRT's renewal process opened December 1 and will run until January 31. During this time much of the board work will be focused on this. Beginning in February the random audit of members occurs regarding continuing competency requirements and participation. This will be completed by April 2018 at which time more attention to the progress opportunities can occur.

Action Plan Follow-Up

A planned follow-up meeting with MARRT and the OMFC will be scheduled in January 2019 to discuss implementation of activities and updates to the Action Plan.

Statement of Compliance

The Manitoba Association of Registered Respiratory Therapists' (MARRT) Action Plan is a positive, substantial response to the progress opportunities identified in this report.

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

MARRT's proposals to work collaboratively, and in different ways, with key stakeholders within, and outside of the profession to develop remediation opportunities for internationally educated respiratory therapists are resourceful and show leadership. I am very encouraged by MARRT's continued commitment to fair practice and in particular, their plans to address the current lack of opportunities for IEAs to fill gaps. I am hopeful these actions will result in increased numbers of licensed, qualified IEAs for Manitoba.

I am pleased to assist where needed and I look forward to our future engagement.



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 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 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"> MARRT 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 	October 18, 2017
Progress Meeting	<ul style="list-style-type: none"> MARRT and Fairness Commissioner discuss report and possible actions MARRT is considering addressing progress opportunities 	November 8, 2017
MARRT Action Plan	<ul style="list-style-type: none"> MARRT's Action Plan submitted to OMFC 	December 4, 2017
2017 Registration Review Report	<ul style="list-style-type: none"> Report submitted to MARRT Report contains the review findings, MARRT's Action Plan, and the Fairness Commissioner's Compliance Statement 	December 13, 2017
Registration Review Closeout Meeting	<ul style="list-style-type: none"> MARRT and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how MARRT's action plan will inform the relationship moving forward Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Seniors and Active Living and uploaded on OMFC website 	December 14, 2017
Action Plan Follow-Up	<ul style="list-style-type: none"> Meeting between MARRT and OMFC to discuss status of action plan implementation 	January 2019

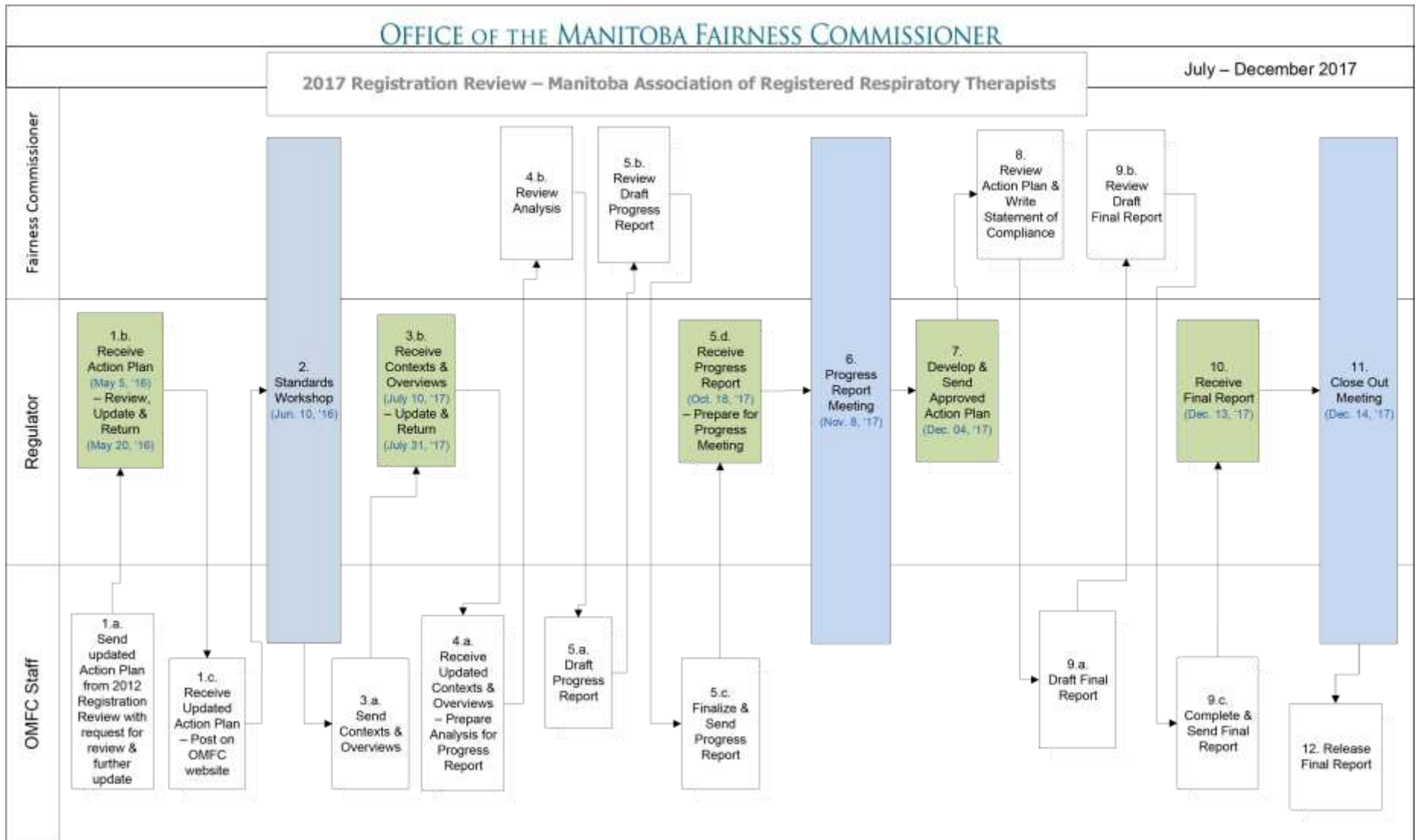
Review participants:

Shane McDonald, Registrar, Manitoba Association of Registered Respiratory Therapists

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

2017 Registration Review – Manitoba Association of Registered Respiratory Therapists

July – December 2017





OFFICE OF THE MANITOBA
FAIRNESS COMMISSIONER

E: omfc@gov.mb.ca

T: 204-945-7353

TF: 1-800-282-8069 ext. 7353

301 – 155 Carlton Street
Winnipeg, MB R3C 3H8

manitobafairnesscommissioner.ca