MANITOBA FAIRNESS COMMISSIONER'S REPORT

On Progress in Fair Registration Practices









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Letter to Minister

Dear Minister Braun:

It is my duty and privilege to submit to you my biennial report covering the period January 2013 to December 2014, in accordance with Section 13(1) of *The Fair Registration Practices in Regulated Professions Act*.

The report, *On Progress in Fair Registration Practice,* provides information on Manitoba regulators' efforts to achieve fair registration practices. It also provides meaningful data on the outcomes, timelines and costs of licensure for internationally educated applicants in our province.

As you will see, progress to date is mixed. Although Manitoba regulators continue to make improvements, the assessment processes for many remain a costly and lengthy challenge.

Moving forward, we will continue to work collaboratively with Manitoba regulators and relevant stakeholders to affect change. Your ongoing support and involvement with other areas of government is very important. They are key players. We need their support on matters of systemic change for more effective engagement on a common vision and measures needed to achieve fair registration practices.

There are many benefits to Manitoba from the contributions of more professionals. We need to ensure an environment that welcomes them and their abilities.

Respectfully submitted,

Ximena Munoz

MANITOBA FAIRNESS COMMISSIONER



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Lettre à la ministre

Madame la Ministre,

J'ai l'honneur et le privilège de vous soumettre mon rapport bisannuel couvrant la période de janvier 2013 à décembre 2014, conformément au paragraphe 13(1) de la Loi sur les pratiques d'inscription équitables dans les professions réglementées.

Le rapport, intitulé *On Progress in Fair Registration Practice* (« Progrès dans les pratiques d'inscription équitables ») fait état des efforts déployés par les organismes de réglementation du Manitoba en vue de l'application de pratiques d'inscription équitables. Il inclut également des données importantes sur les résultats, les échéanciers et les coûts des pratiques de délivrance de permis dans notre province aux demandeurs instruits à l'étranger.

Vous pourrez noter que, jusqu'à maintenant, le bilan s'avère mitigé. Bien que les organismes de réglementation du Manitoba continuent d'améliorer leurs pratiques, leur procédure d'évaluation des compétences demeure un défi coûteux et de longue durée pour de nombreux demandeurs.

Nous allons poursuivre notre collaboration avec les organismes de réglementation du Manitoba et avec les autres intervenants concernés dans le but de produire les changements requis. Votre appui continu et votre collaboration avec d'autres secteurs gouvernementaux demeurent d'une grande importance car ce sont des joueurs clés. Nous avons besoin de leur appui sur ces enjeux de changement systémique, car il nous faut un engagement de leur part qui produit plus de résultats : une vision commune et des mesures qui favorisent des pratiques d'inscription équitables.

La contribution d'un plus grand nombre de professionnels ne peut être que tout à l'avantage du Manitoba. Il nous faut veiller à ce qu'ils trouvent dans notre province un milieu qui les accueille et qui désire profiter de leur compétence.

Le tout respectueusement soumis.

LA COMMISSAIRE À L'ÉQUITÉ DU MANITOBA,

Ximena Munoz

Message from Fairness Commissioner



Ximena Munoz

MANITOBA FAIRNESS COMMISSIONER

We need to get it and do it right.

One in three applicants for licensing to Manitoba regulators is now internationally educated. Our inability to properly recognize and license them is a major problem for our province. We not only fail them, we also fail parts of our province that are facing critical shortages of professionals in numerous service areas.

There has been overall progress in fair assessment and recognition practices in Manitoba's regulated professions. But this progress is mixed.

Manitoba is benefiting from its fairness legislation. Working with us, regulators are looking at how processes are working for internationally educated applicants and acknowledging the challenges. A lot of activity has been undertaken to improve registration practice. Regulators are making progress in procedural fairness. We are better informed and, from our experience with regulators and the information we have on applicants, we can see real opportunities for continued progress.

Collecting data from regulators has allowed Manitoba to move beyond anecdotes to a fact-based understanding of how things are working for internationally educated professionals. High numbers of internationally educated applicants are not getting licensed. And many are in process for a long time. Many continue to be blocked by assessments that do not allow them to truly demonstrate competence.

As a result, in the report we identify the need for systemic change. In order for us to benefit fully from the competent immigrant professionals coming to Manitoba, we need to do more than improve faulty systems that are costly, taking too long and not effective in recognizing international competencies.

Licensure processes that keep people out of practice for more than a year are not efficient, effective or fair. In the coming years we will be focusing on this key substantive fairness issue. The recognition of professional work experience and opportunities for supervised practice are two strategies that would go a long way towards addressing this issue.

I want to thank the many progressive people involved in the work of recognizing the qualifications of internationally educated professionals. My colleagues at the Office of the Manitoba Fairness Commissioner (OMFC), Manitoba regulators, colleagues in different levels of government, my fellow commissioners and several other stakeholders have made impressive contributions towards enhancing the fairness of the current state of qualification recognition in Manitoba.

Although our work is not done, I have much confidence in those involved, and I know we are up to the challenge of ensuring that all competent applicants get licensed to practice their profession in Manitoba.



Introduction

This report provides an overview of the state of fair licensure practice by Manitoba regulators subject to *The Fair Registration Practices in Regulated Professions Act* as it relates to internationally educated professionals. The report shows what has improved and what remains to be done to realize fair practice.

All regulators subject to the government's fairness legislation have undertaken registration reviews with the Office of the Manitoba Fairness Commissioner (OMFC). The Fairness Commissioner has made many recommendations to improve practice and regulators have taken action. This report provides a summary analysis of the progress, as well as individual progress statements for each regulator. Data is presented from Manitoba regulators and Manitoba Labour and Immigration.

Public interest in fair registration practices for internationally educated professionals (IEPs) is high. Manitoba has a strong commitment to grow through immigration and continue to strengthen economic development and the diversity of its communities.

Recent immigration information provides context for the urgency of fair practice. In the 2011-2014 period:

- Manitoba's Provincial Nominee Program accounted for 73 per cent or 42,914 of the total 58,600 immigrant landings
- of economic class immigrants over 25 years old, 65 per cent or 23,209 immigrants arrived in Manitoba with postsecondary education
- the largest groups of professionals arriving to Manitoba were accountants (1,463), registered nurses (1,206), teachers (826), engineers and geoscientists (596), engineering technicians and technologists (589) and physicians and surgeons (230).

The Fair Registration Practices in Regulated Professions Act calls for regulators to report on the registration of internationally educated applicants (IEAs). Regulator data between 2011-2014 shows the challenge:

- one-third of all applicants to Manitoba regulators were internationally educated
- thirty-one (31) regulated professions received 4,689 internationally educated applicants compared to 9,325 domestically educated
- eighteen (18) per cent of internationally educated applicants who applied in this period received full licensure
- domestically educated applicants (DEAs) were almost three times more likely to be licensed than those educated outside of Canada; 4,334 out of 9,325 (46 per cent) received full licenses compared to 864 of 4,689 (18 per cent) for IEAs
- twelve (12) per cent of IEAs started their applications outside of Canada
- a significant number of internationally educated applicants are in a prolonged registration process. Of those IEAs who applied in 2011, 35 per cent remained in process as of December 31, 2014
- top countries of education for IEAs were the Philippines (36 per cent), India (13 per cent) and Nigeria (seven per cent)
- the regulators who received the largest number of internationally educated applicants were the Association of Professional Engineers and Geoscientists of Manitoba (APEGM), the College of Licensed Practical Nurses of Manitoba (CLPNM), the College of Physicians and Surgeons of Manitoba (CPSM) and the Certified General Accountants Association of Manitoba (CGA)

Progress has been made. Manitoba regulators have improved websites, increased orientation and preparation supports, evolved documentation policies and assessment methods. These are important steps forward and are making a difference.



In several professions, however, there remains a need to address fundamental systemic issues. Internationally educated applicants are not provided effective, timely licensure opportunities. Too many qualified people are blocked and for those who do persevere, the process takes too long. Effective information and improved assessment supports may not be sufficient to realize fair practice. To make progress, improved alternative assessment methods and licensure pathways are required to recognize IEA qualifications as well as gap training and orientation opportunities.

Moving forward, the Fairness Commissioner is calling for many Manitoba regulators to:

- improve the timeliness of the assessment and registration process
- better recognize qualifications evident in professional work experience
- provide supervised practice opportunities



Progress Summary

The Fair Registration Practices Code in Manitoba's fairness legislation calls for regulators to have "transparent, objective, impartial and fair" registration practice. A general duty to fair practice and a number of specific duties are stipulated.

Manitoba regulators have taken significant steps to improve compliance with fairness legislation, although in some areas of practice, significant challenges remain. A summary of this progress follows. Fair registration practice is discussed in terms of procedural fairness, relational fairness and substantive fairness.

Procedural Fairness

Manitoba regulators have made progress in procedural fairness. For internationally educated applicants today, the licensure process is fair and continues to improve.

All Manitoba regulators are committed to providing clear registration information and many have comprehensive, applicant-friendly packages designed for internationally educated applicants. Regulators collaborate with Manitoba Start to support their orientation for newcomers and the development of new resources for clients seeking guidance on licensure and career planning.

PROCEDURAL FAIRNESS

Regulators have a duty to provide clear, complete and understandable assessment and registration information; timely decisions; written reasons for unfavourable decisions; appeal opportunities; and access to records and information about available supports.

Eight regulators have developed online audio-based presentations on registration processes:

- College of Dental Hygienists of Manitoba
- College of Dietitians of Manitoba
- College of Licensed Practical Nurses of Manitoba
- College of Medical Laboratory Technologists of Manitoba
- College of Midwives of Manitoba
- College of Physiotherapists of Manitoba
- Manitoba Institute of Agrologists
- · Opticians of Manitoba

Eight regulators have completed overviews of their registration steps and required documents to enhance their online information:

- Certified Technicians and Technologists Association of Manitoba
- College of Dietitians of Manitoba
- College of Medical Laboratory Technologists of Manitoba
- College of Occupational Therapists of Manitoba
- Manitoba Chiropractors Association
- Manitoba Institute of Agrologists
- · Law Society of Manitoba
- Opticians of Manitoba













Manitoba regulators are making use of applicant-friendly national websites in professions that have made progressive changes for IEAs, such as providing self-assessment tools and preparation supports.

- Certified Technicians and Technologists Association of Manitoba
- College of Medical Laboratory Technologists of Manitoba
- College of Midwives of Manitoba
- College of Occupational Therapists of Manitoba
- College of Pharmacists of Manitoba
- College of Physicians and Surgeons of Manitoba
- College of Physiotherapists of Manitoba
- Manitoba Association of Registered Respiratory Therapists

Several Manitoba regulators have introduced or improved written reasons for unfavourable assessment decisions. This allows applicants to see where they do not meet standards and what remedial action they need to take.

Further efforts are needed to improve procedural fairness:

- Although regulators have appeal provisions in their legislation, some regulators fail to provide appeal information, have unduly restrictive appeal opportunities, or have no appeal process in place.
- Some regulators still provide very limited registration information and improved navigation is required to more effectively direct applicants from national website portals to provincial regulator information and contact points.











RELATIONAL FAIRNESS

A licensure process is relationally fair if the regulator communicates the meaning and reasons for decisions to applicants, treats applicants with respect and allows applicants the opportunity to respond and be heard.

Relational Fairness

Relational fairness is particularly important for internationally educated professionals who come from diverse cultural backgrounds and may be unfamiliar with how their professions are practiced in Canada.

To support regulators, OMFC has sponsored cultural diversity training for staff. Diversity training helps improve communication and reduces negative bias against cultural differences.

Many Manitoba regulators excel at providing strong personal support and assistance. Some regulators have introduced dedicated staff to provide information and advice.

Some Manitoba regulators made progress in relational fairness by introducing a pre-appeal process. Pre-appeal provides a first-step, informal review of the applicant's concern. This allows policies and decisions to be fully explained and may resolve mistakes or errors, avoiding the time and expense of a formal appeal.

To improve support for IEPs and strengthen relational fairness, OMFC worked with regulators to develop Professional Practice Seminars. These seminars introduce applicants to their professions' norms, workplace culture and environments. They help IEPs transition and understand how their profession is practiced in Manitoba.

Seminars are available for nursing, engineering, engineering technologies and accounting and one for a group of 10 other health professions. Content was gathered with members of each profession, educators, regulators and business. Six regulatory bodies are now committed to deliver seminars to their internationally educated applicants on an ongoing basis and 26 individuals were trained to deliver the sessions. Manitoba regulators recognize the importance of providing applicants with a deeper profession specific orientation. Several regulatory bodies have begun to offer the seminars to their applicants and will continue to work with the OMFC and other relevant stakeholders to ensure sustainable and effective delivery.

Regulators with trained facilitators now offering the seminars to IEPs:

- Certified Technicians and Technologists Association of Manitoba
- Chartered Professional Accountants Manitoba
- College of Licensed Practical Nurses
- College of Medical Laboratory Technologists of Manitoba
- College of Midwives of Manitoba
- College of Occupational Therapists of Manitoba

Substantive Fairness

The progress made by Manitoba regulators in procedural and relational fairness is encouraging. Progress in substantive fairness is less so. There is lack of progress improving the timely licensure and outcomes for qualified IEPs. Unwarranted screens and prolonged licensure processes present a major fair practice challenge.

Traditional systems of assessment and licensure need to improve.

Many regulatory exams were developed for Canadian education programs and are suited to their graduates. Many experienced, highly qualified mid-career Canadian professionals would struggle to pass these exams without extensive studying. Likewise, internships, residencies and articling programs are designed for recent new practitioners and not mid-career professionals trained abroad.

Substantively fair licensure practice calls for the assessment of internationally acquired qualifications that are relevant to the knowledge, skills and judgment required for safe practice. There is a need for assessment preparation, professional orientation and integration supports for the unique circumstances of internationally educated applicants. Qualified applicants need opportunities to enter their professions within a shorter period of time.

SUBSTANTIVE FAIRNESS

A licensure process is substantively fair when only and all qualified internationally educated professionals are licensed in an efficient and timely manner.

GAP AND BRIDGE TRAINING PROGRAMS IN MANITOBA

- Bridge Program for Internationally Educated Nurses, Red River College
- Early Childhood Educator: Internationally Educated
 Qualifications Program, Manitoba
 Family Services
- Internationally Educated
 Engineers Qualification Program,
 University of Manitoba
- Internationally Educated
 Agrologists Program, University of Manitoba
- International Dental Degree
 Program, University of Manitoba
- International Medical Graduate
 Program , Medical Licensure
 Program for International Medical
 Graduates, Non Registered
 Specialist Assessment Program,
 University of Manitoba
- International Technologist
 Bridging Program for
 Internationally Educated Medical
 Laboratory Technologists,
 Diagnostic Services Manitoba
- Practical Nursing Qualification Recognition Pilot Program, Assiniboine Community College
- Technical Project and Report
 Writing for Certified Technicians
 and Technologists, Red River
 College

Progress in substantive fairness by Manitoba regulators:

- some progressive web-portals designed for IEPs have been introduced and include self-assessment tools, preparation supports and improved information about Canadian professional practice
- many regulators allow IEPs to begin the registration process outside of Canada
- several Manitoba regulators have streamlined duplicate documentation requirements with their national bodies
- some regulators have implemented alternative documentation policies for applicants who cannot, with good reason, supply official documents
- several Manitoba regulators no longer require criminal records check from the applicant's home jurisdiction and accept the federal government security checks from the final stages of immigration selection
- some regulators have stronger supports for licensure exam preparation
- several Manitoba regulators, in collaboration with the province, post-secondary institutions and employers have established gap and bridge training programs for IEPs

There is also progress to report on the use of dedicated assessments for IEPs.

- Reliance on academic credential evaluations has shifted towards outcome-based assessments. Instead of a courseby-course credit hour comparison, some professions determine substantive equivalence by looking at the competencies and knowledge provided by the education.
- Over the last two decades, especially in the health professions, competency assessments have been put in place so applicants can demonstrate skills and knowledge required for safe practice.
- There are now more agreements between international jurisdictions or educational institutions acknowledging similar education and practice standards. These mutual recognition and reciprocity agreements result in faster licensure processes for IEPs from source countries.

The assessment of professional work experience is critical for the fair recognition of qualifications of mid-career internationally educated applicants. Although regulators universally acknowledge the importance of the knowledge, skills and judgment acquired through professional experience, few have assessment strategies in place adequate to recognize it. To be fair, the assessment of qualification cannot ignore professional work experience.

PROFESSIONS WITH INTERNATIONAL MUTUAL RECOGNITION AGREEMENTS

- architects
- chartered professional accountants
- chiropractors
- dental hygienists
- dentists
- engineering technicians and technologists
- engineers
- physicians and surgeons
- psychologists
- speech and language audiologists
- veterinarians

PROFESSIONS WITH INTERNATIONAL ACCORDS

- architects
- engineers
- engineering technicians and technologists

PROFESSIONAL BODIES WITH NATIONAL PORTALS FOR INTERNATIONAL APPLICANTS LINKED TO MANITOBA REGULATORS

- Association of Canadian Occupational Therapists
- Canadian Alliance of Physiotherapy Regulators
- Canadian Architectural Certification Board
- Chartered Professional Accountants
- Canadian Society for Medical Laboratory Science
- Canadian Technology Immigration Network
- Engineers Canada
- Federation of Law Societies
- Medical Council of Canada
- · National Dental Examining Board
- National Nursing Assessment Service
- National Association of Pharmacy Regulatory Authorities

IEPs with work experience comparable to Canadian standards should have their qualifications assessed and recognized. For qualified applicants, consideration needs to be given to:

- supplementing the assessment of academic qualifications
- reducing or waiving exam and assessment requirements
- shortening or waiving internship, articling or member-intraining requirements

Unfortunately, the majority of Manitoba regulators get a failing grade for not recognizing professional work experience:

- twenty-nine (29) per cent (9/31) of Manitoba regulators give consideration to professional work experience to supplement academic qualifications. Only 10 of them use this consideration to meet the shortfalls in the clinical hours of an applicant's academic program.
- Only six per cent (2/31) of Manitoba regulators will consider professional work experience to waive exam and assessment requirements.
- Only 19 per cent (6/31) of Manitoba regulators will consider professional experience for the purpose of shortening or waiving an internship, articling or member-in-training requirement.
- Thirty-nine (39) per cent (12/31) provide no consideration of professional work experience.

The need to improve the recognition of qualifications gained through professional work experience among Manitoba regulators is critical.

National Professional Bodies and Manitoba Regulators

The majority of Manitoba's regulators use national professional bodies for some or all of their licensure assessments and exams. Under *The Fair Registration Practices in Regulated Professions Act,* fairness requirements for Manitoba regulators also apply to any third party the regulator uses in the assessment process.

Activity by national professional bodies to evolve assessment practice has been both positive and negative for IEAs seeking licensure in Manitoba. National activity that has supported improving fair practice for Manitoba regulators includes:

- improved national web portals specifically designed to support internationally educated applicants, including selfassessment tools, preparation supports and user-friendly documentation and application tracking
- expert reviews of professional competencies and improvements to national licensure assessments and exams
- the development of new assessment tools for IEAs including competency assessments and prior learning tools
- expansion of international accords and mutual recognition agreements which support the recognition of similar accreditation processes and international credentials

There have been some negative, unintended consequences from national activity that pose a challenge for Manitoba regulators to improve practice. Among them:

- nationally harmonized assessments that interfere with Manitoba licensure programs and solutions
- assessments that fail to provide more effective licensure pathways, and where costs have increased and the process takes more time for applicants

While Manitoba regulators have raised the concerns identified by the Fairness Commissioner in their registration reviews, national bodies, for the most part, have not been responsive.

PROFESSIONS WITH CENTRALIZED INTAKE AND INITIAL ASSESSMENT USED BY MANITOBA REGULATORS

- architects
- chartered professional accountants
- dentists
- lawyers
- medical laboratory technologists
- nurses (LPN, RN,RPN)
- pharmacists
- physicians
- physiotherapists



Moving Forward on Key Issues

Progress in fair registration practice among Manitoba regulators is clearly mixed. The lack of progress in substantive fairness is a persistent concern. Data from regulators indicates low success rates and extended licensure timelines for internationally educated applicants. There have been improvements in procedural and relational fairness, but there is a need to shorten processes and improve outcomes for IEAs.

The Fairness Commissioner has identified timely registration, the recognition of professional work experience and supervised practice opportunities as key substantive fairness issues that need to be addressed among Manitoba regulators:

- Licensure processes need to be faster. Time out of practice de-skills qualified people. Sending people back to school to retake degrees or to undergo lengthy post-secondary bridge training is not an efficient or cost-effective solution.
- Licensure assessments need to better recognize
 professional work experience. Most professions fail to
 give IEAs sufficient recognition of essential qualifications
 acquired through work experience. Waived regulatory
 exams, shortened internships and fast-track licensure
 opportunities need to be in place for individuals
 with extensive professional experience substantively
 comparable to Canadian standards.
- Supervised practice opportunities with assessment and orientation supports are a gold standard of progressive practice. Supervised practice gives people the opportunity to demonstrate what they know and can do in an environment where they can learn and adapt. Success rates for supervised practice programs are very high.

Licensure processes that keep people out of practice more than a year are not efficient, effective or fair.

LISBON RECOGNITION CONVENTION

Canada is a signatory to the Lisbon Recognition Convention, which stipulates that educational degrees and credentials must be recognized unless substantial differences are established by the institution that is charged with recognition. The convention identifies a number of principles to ensure fair assessment procedures, including the need for timely assessments, periodic quality assurance reviews and the absence of discrimination based on ethnicity, race and language.

Moving forward with Manitoba regulators, the Fairness Commissioner will revisit and continue to press for progress on these key fair practice issues. These issues will be the focus of OMFC's second round of registration reviews to begin in the winter of 2015.

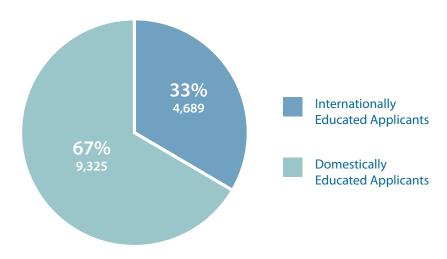
The Fairness Commissioner will continue to engage and provide advice to provincial ministers responsible for the legislation of Manitoba regulators, and seek input from internationally educated professionals on their experiences with registration practices in their professions.

Licensure Outcome and Timeline Findings

The Fairness Commissioner has identified low licensure rates and prolonged assessment and registration processes for internationally educated applicants as critical issues reflecting lack of fair practice.

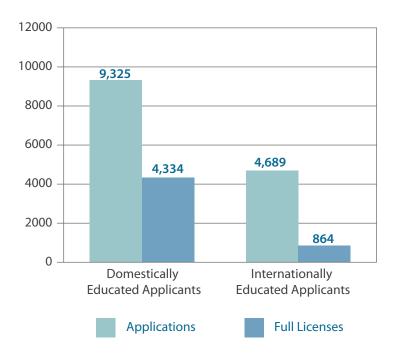
Registration data collected from Manitoba's regulators from 2011 to 2014 allows us to follow the timelines and outcomes for IEAs as they go through the licensing process. This data indicates IEAs comprise a significant portion of applicants to Manitoba regulators, but that few IEAs are licensed and many face extended licensure timelines compared to domestically educated applicants (DEAs).

IEAs total one-third of all applicants to Manitoba regulators:

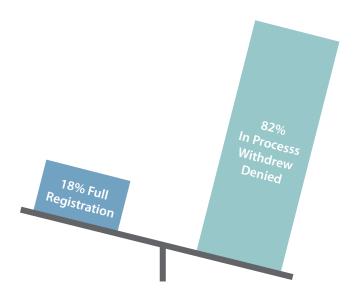


Application Outcomes 2011-2014

There is a marked contrast in registration outcomes for internationally educated applicants compared to domestically educated applicants. DEAs were almost three times more likely to be licensed than IEAs.



Of the 4,689 IEAs that applied for registration to Manitoba regulators in this four-year period, 18 per cent (864) received full registration in this period. The majority of IEAs, 82 per cent (3,825) either remain in process, or had their applications rejected or withdrew their applications.

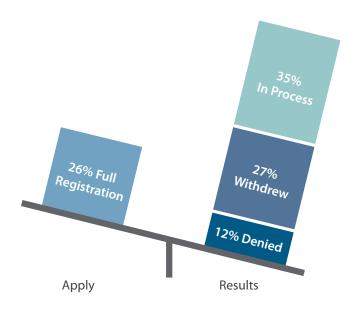


The Fairness
Commissioner calls for
Manitoba regulators to
provide timely licensure
opportunities for
internationally educated
applicants. This aligns
with principles in the
Lisbon Recognition
Convention.

Outcomes for Internationally Educated Applicants in 2011

Data from 2011-2014 is not sufficient to give the full picture about licensing timelines. Many internationally educated applicants take longer than four years to be licensed. Looking only at 2011 applicants allows for a fuller picture of timelines and outcomes because we can see what happens in a three-to-four-year period.

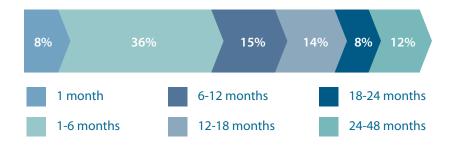
Registration data indicates the following outcomes for the 978 IEAs who applied to Manitoba regulators in 2011. As of December 31, 2014, 35 per cent (338) remain in process; 27 per cent (268) withdrew application; 26 per cent (254) were fully licensed; and 12 per cent (118) had their applications denied. Of concern is the high number of IEAs that remain in process three to four years after application and the low number being fully licensed.



Applied January 2011 and Results December 2014

Timelines to Full Licensure 2011-2014

Based on available information from regulators, the figure below represents the length of the process for 833 fully licensed internationally educated applicants, from application to the Manitoba regulator to full licensure.



Data for this group shows that for 59 per cent of licensed IEAs it took 12 months or less from file opening to full registration. For 12 per cent, it took two to four years.

The data does not include the time it takes IEAs to collect documents and prepare complete applications, which can take several months to a year or more. It also does not include national body assessment and certification time. For 41 per cent of Manitoba regulators, applicants must first undergo assessment and certification by a national body before applying to them. Timelines vary, but this first step can take several months to several years.

The figure below shows the registration timeline with Manitoba regulators in context with the other steps to registration mentioned above.



Internationally educated professionals in Manitoba have access to Recognition Counts!, a loan program for those wishing to reenter their professions or related professions in Manitoba. This program is delivered by SEED Winnipeg in partnership with Assiniboine Credit Union and the Manitoba government. It works in co-operation with other financial support services provided by the provincial government. Living expenses are eligible costs under the program and account for a considerable percentage of loan funds. It is recognized that when IEPs can focus on their licensing processes full-time they increase their chances of success and re-enter their professions in a more timely manner.

Costs of Licensure

Full licensing costs for internationally educated professionals vary markedly by profession and the circumstances of the applicant.

The table below provides fee information collected from Manitoba regulators and third party assessors, and gives an idea of the costs internationally educated applicants face.

| Licensing Costs | | |
|------------------|-----------------|------------|
| | Range | Average |
| Application Fee | \$0-\$3,100.00 | \$730.99 |
| Assessment Fee | \$0-\$17,690.00 | \$3,192.22 |
| Registration Fee | \$0-\$3,500.00 | \$1,333.03 |
| Total | \$0-\$20,045.00 | \$5,256.24 |

These numbers do not include other costs associated with licensing such as supplying documents, translation of documents, language proficiency tests, criminal record checks, exam preparation courses and exam re-writes. Academic upgrading and gap training program costs are also not included in this table. These can represent a major expense and delays for those requiring it. While it is possible or necessary in some professions to work while completing licensing requirements, it can be very difficult to do so in others, especially while fulfilling gap training requirements. Without sufficient options for financial support during licensing, most IEPs must work and many end up taking survival jobs, prolonging their licensing processes.



In Closing

There is a need to further improve the quality of registration practices for internationally educated professionals that will result in timely outcomes. Licensure processes that keep people out of practice more than a year are not efficient, effective or fair. Greater emphasis is needed to better recognize competencies gained through international work experience. Faster tracks are needed for those who are substantially equivalent and who only need to better understand new professional practice settings, fill specific gaps and have opportunities to apply their skills in their fields. Expanded opportunities are needed for supervised practice. Registration costs need to be reasonable and based on cost recovery.

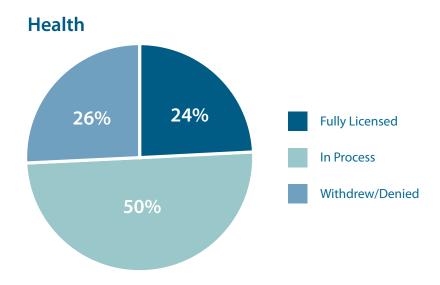


Progress in Health Professions

This section provides progress statements for each of the 21 Manitoba health regulators subject to *The Fair Registration Practices in Regulated Professions Act*.

Licensure in the health professions tends to be more challenging for internationally educated applicants compared to licensure in the science, technical, legal and financial professions. Heightened public safety concerns often result in more intense qualification assessments and more restrictive licensing regimes. Nearly all health professions possess "right to practice and title" legislation; this means employment in the field is not possible without licensure. Multiple exams, competency assessments followed by gap training, and English language proficiency requirements are commonplace. Increasingly, the larger health professions register applicants using national, centralized intake systems.

Of 2,248 IEAs to health professions in the 2011-2014 period, 544 (24 per cent) received full licensure, 1,125 (50 per cent) remain in process and 579 (26 per cent) either withdrew or were denied registration by the end of December 2014.



College of Registered Nurses of Manitoba

The College of Registered Nurses of Manitoba (CRNM) has 13,613 registered members with 30 full-time staff, and received 2,216 total applications including 480 internationally educated applicants in 2011-2014. CRNM registration practices for internationally educated nurses (IENs) are not making sufficient progress towards fair practice and in many respects, the situation for IENs is getting worse. With limited capacity bridge training as the only option for IENs to address gaps, registration is a prolonged process with limited numbers of IENs achieving success.

To complete the CRNM licensure process today, the majority of IENs face a commitment of over three to five years. The initial application assessment conducted by the recently implemented National Nursing Assessment Service (NNAS) takes upwards of eight months and costs \$650 USD. This is in addition to CRNM's application fee of \$525. All IENs, regardless of academic qualification, must undergo a clinical competency assessment (CCA), for which a six-to-sevenmonth wait has not been uncommon and has not been available since June 2015. Even those applicants deemed by NNAS to possess academic qualification equivalent to Canadian standards must undergo clinical assessment. In 2011-2014, 40 per cent of the CRNM's IEN applicants had not yet undergone a CCA. Of those who received a CCA outcome, approximately three out of four are clinically assessed as needing gap training. This group must wait another 18 months to enter Red River College's 16-to-22week week Bridging Program for Internationally Educated Nurses (BPIEN). Fourteen per cent of IENs demonstrate sufficient competence to meet CRNM eligibility for Graduate registration and to write the licensure exam. Ten per cent of IENs do not qualify for the BPIEN due to poor CCA results and are directed to retake an entire nursing program if they are to continue to pursue licensure.

CRNM's application and documentation policies are further compounding the problem. IENs are required to repeatedly submit documents that expire as they await assessment.

Language proficiency policies pose a major barrier and delay. IEAs are asked to resupply language tests results.

The CRNM has made efforts towards improving registration information for IENs, including a helpful audio presentation and handbook. This work has been somewhat compromised in the transition to the National Nursing Assessment Services. A formal appeal/pre-appeal process and written reasons for unfavourable clinical competency assessment decisions are under development.

Relational fairness is a problem for CRNM. A common theme among the dozens of IENs that have contacted OMFC is the dismissive manner in which concerns are handled by college staff. Applicants are not advised of their right of appeal and told "rules are rules," "the registrar is very strict" and "a review will not change anything." Applicants are given the impression little attention is being paid to address concerns regarding policy and criteria applied without consideration of what they perceive to be relevant circumstance. Often nothing is offered in writing to communicate the rationale of the policy in question and why it may need to be upheld in their case.

The CRNM is working with Manitoba Health, Healthy Living and Seniors, Red River College, two regional health authorities and the OMFC to develop how the BPIEN may better supply IENs to regions outside Winnipeg.

Given the large number of IENs in Manitoba and the limited capacity of the Bridging Program (40 seats annually) additional pathways for IENs to meet qualification gaps are needed. The CRNM has had success in the past with workplace-based gap training and it needs to be considered again.

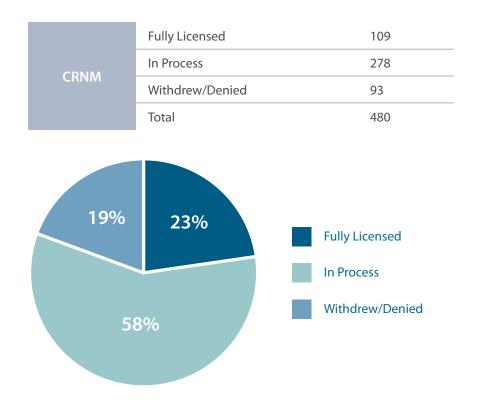
The extended waitlists for competency assessment and bridge training are turning many IENs to seek registration as licensed practical nurses (LPNs) with the College of Licensed Practical Nurses of Manitoba. Many IENs are on long waitlists for assessment and bridging in both of these professions. An integrated approach for both clinical assessment and bridge training in these closely related professions would help maximize assessment capacity and better support matching IEN skill sets to the right nursing profession.

Manitoba's 2008 Philippine Nurses **Recruitment Program** is a great example of what is possible with an alternative, workplace-based assessment and training licensure pathway. One hundred and twentytwo IENs underwent a CRNM approved screening process followed by employerbased orientation and training. One hundred and nineteen (97.5 per cent) successfully completed the licensure process without the requirement for remedial academic training. Employers reported high satisfaction and confidence in this group of professionals. (continued on next page)

The Fairness Commissioner is calling for the CRNM to:

- rationalize and streamline the system of IEN assessment and licensure, including an integrated competency assessment for RNs and LPNs
- develop additional ways to fill gaps for licensure including workplace-based gap training approaches
- ensure the NNAS credential assessment is of greater value in the process. Applicants with academic qualifications substantively equivalent to Canadian standards should be recognized and be provided a timely licensure opportunity similar to Canadian-trained applicants
- implement fair documentation and language proficiency policies

Registered nursing registrations (2011-2014): Of the 480 IEAs that applied to CRNM, 109 (23 per cent) were fully licensed, 278 (58 per cent) remain in process, and 93 (19 per cent) either withdrew or were denied.



College of Licensed Practical Nurses of Manitoba

The College of Licensed Practical Nurses of Manitoba (CLPNM) has 3,194 registered members with 10 full-time and two part-time staff, and received 797 total applications including 625 internationally educated applicants in 2011-2014. CLPNM currently provides few internationally educated nurses a timely licensure opportunity. It currently takes most IENs from three to five years or more to be registered as an LPN.

IENs begin by applying to the recently implemented National Nursing Assessment Service (NNAS) and are currently waiting over eight months for a \$650 (USD) advisory report or initial credential assessment.

Prior to the NNAS, few IENs were deemed qualified by the CLPNM upon the initial review of academic qualifications. Those IENs deemed qualified are eligible for graduate registration and can quickly enter practice.

The vast majority of IENs must undergo a competency assessment by Assiniboine Community College (ACC). Although recently improved, waitlists for this assessment still remain over a year. The 90 per cent of IENs that take the competency assessments have gaps identified and must complete bridge training through Assiniboine Community College's Practical Nurse Qualification Recognition Program. With only 30 seats a year and a backlog of applicants, wait times to enter the program are now two to three years or longer. Since the introduction of the ACC competency assessment/bridge training pathway in 2012, CLPNM has registered only a small number of IENs.

The CLPNM recognizes the current crisis and is committed to looking at additional licensure pathways and delivery of gap training. They are currently working with the Manitoba government on the feasibility of a workplace-based orientation and assessment program for regions outside of Winnipeg.

The college has a history of progressive documentation practice and rarely required applicants to retake language

(continued)

The success of this initiative lay in the nature of the orientation and integration supports in place. In regions outside Winnipeg, orientation, integration and assessment in the workplace proved timely and effective.

Fair language proficiency requirements and policies involve ensuring:

- language proficiency levels are reasonable
- full language proficiency required only upon registration or just before licensure
- all relevant evidence of proficiency is considered including a variety of language tests and a history working, living or studying in an English or French environment
- applicants are not asked to retake language tests without sufficient reason
- helpful, accurate information is provided about the need for English or French language proficiency, including resources for language upgrading

The Fairness Commissioner has made recommendations to several regulators failing to meet these fairness criteria. Issues resulting from changes to language proficiency requirements in Manitoba's nursing professions remain a pressing concern.

tests as a result of dates expiring. Unfortunately, in the interest of national harmonization and with some reluctance, CLPNM has now adopted several unfair language proficiency policies implemented by NNAS.

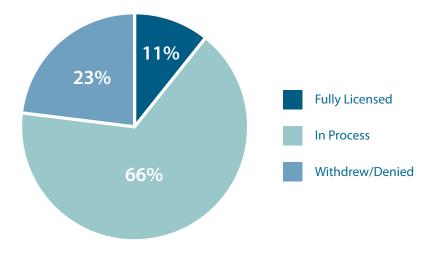
CLPNM has done significant work improving its registration information for IENs and improving procedural fairness. A dedicated IEN Guidebook, that presents complete, applicant-friendly information about their registration process, is now available on its website. Written reasons for unfavourable assessment decisions and a pre-appeal process have been implemented.

The Fairness Commissioner is calling for CLPNM to:

- streamline its system of licensure by moving to a single integrated competency assessment for LPNs and RNs
- ensure NNAS credential assessment is a greater value to the recognition process
- implement fair language proficiency policies

Licensed Practical Nursing Registrations (2011-2014): Of the 625 IEAs that applied to the CLPNM, 67 (11 per cent) were fully licensed, 414 (66 per cent) remain in process, and 144 (23 per cent) either withdrew or were denied.





College of Registered Psychiatric Nurses of Manitoba

The College of Registered Psychiatric Nurses (CRPNM) has 983 registered members with three full-time and one part-time staff, and received 194 total applications including 62 internationally educated applicants in 2011-2014. The CRPNM continues to improve a strong information package for internationally educated psychiatric nurses (IEPNs). Early in its engagement with the OMFC, the CRPNM developed a dedicated, applicant-friendly web section for IEPNs.

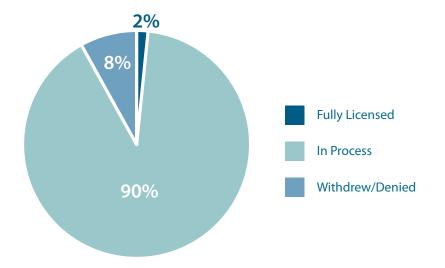
IEPNs have access to a much improved Registered Psychiatric Nurses of Canada Exam. The exam underwent an expert review and is now more relevant and half the length of the old exam.

The CRPNM principal qualification requirement for registration is academic training. Professional work experience is only assessed to determine currency of practice. The Fairness Commissioner has recommended CRPNM move toward fair assessments by implementing a strategy to recognize qualifications evident in professional work experience. CRPNM recently approved new Entry Level Competencies. This lays the foundation for CRPNM to develop tools to assess professional work experience.

Along with the other nursing professions in Manitoba, CRPNM's licensure process underwent a significant transition in August 2014 with the introduction of the National Nursing Assessment Service (NNAS). CPRNM is one of three Manitoba nursing regulators that the Fairness Commissioner has recommended review the recently-adopted NNAS language proficiency policies.

Psychiatric Nurse Registrations (2011-2014): Of the 62 IEAs that applied to CRPNM, one (two per cent) was fully registered, 56 (90 per cent) remain in process, and five (eight per cent) either withdrew or were denied. This low percentage of registrations reflects the high number of IEPNs that initiate application from abroad but do not come to Canada to complete the process.

| CRPNM | Fully Licensed | 1 |
|-------|-----------------|----|
| | In Process | 56 |
| | Withdrew/Denied | 5 |
| | Total | 62 |



College of Physicians and Surgeons of Manitoba

The College of Physicians and Surgeons of Manitoba (CPSM) has 3,849 registered members with 27 full-time staff and five part-time staff, and received 1,032 total applications including 580 internationally educated applicants in 2011-2014. The CPSM system of licensure for international medical graduates (IMGs) is complex, involves multiple stakeholders with multiple exams and clinical assessments and can take several years to complete.

The CPSM has recently improved its registration information, introducing a dedicated application guide for IMGs on its website. The CPSM website links to a national first-step web portal – physiciansapply.ca. This website provides an overview of the licensure process and supports streamlined documentation, including a repository for applications used by all provincial regulators.

IMGs trained in jurisdictions and medical programs recognized as providing substantively equivalent training

by CPSM's national bodies can qualify for conditional registration by completing only the first of a series of exams. IMGs from jurisdictions and medical programs that are not recognized by the national bodies in this way, must gain Canadian residency experience in addition to completing the exams. For this group, the majority of IMGs that come to Manitoba, opportunities to gain Canadian residency experience are very competitive and limited.

Canadian residency experience can be gained in Manitoba either through the Canadian Resident Matching Service (CaRMs) or through an IMG program at the University of Manitoba's College of Medicine. CaRMS is a national matching service for Canadian medical graduates and IMGs for entry into postgraduate medical training throughout Canada. In Manitoba, IMGs compete with Canadian medical graduates upon the first round of placement matching; other provincial jurisdictions do not permit IMGs to compete for spots until the second round of the matching process.

The University of Manitoba, Faculty of Health Sciences, College of Medicine offers several IMG programs that provide varying degrees of orientation, assessment and training — two streams for family physicians and one for specialists. To enter a program, IMGs must sign a four-year return-of-service agreement to work in an underserviced health region in Manitoba after completing the program.

For IMGs who require a CaRMS or IMG Program residency spot, licensure is a competition. The harsh reality for both IMGs and Canadian medical graduates is that there are fewer residency spots than medical graduates. The University of Manitoba's IMG Programs annually receive between five to 10 times the numbers of qualified IMGs they can accept; CaRMs is even more competitive for IMGs.

To enter an IMG Program, applicants must be deemed eligible for conditional registration by CPSM. IMGs require two years of post-graduate training or one year with professional practice experience. The CPSM assesses post-graduate training and professional work experience only once the applicant is being considered for entry to the IMG Program. This means IMGs can spend several years and



thousands of dollars on multiple exams and assessments only to be told that they do not possess the requisite post-graduate training and professional experience to qualify for the IMG program.

The Fairness Commissioner is calling for the assessment of post-graduate training upfront in the assessment process.

There is also a need for CPSM to develop options for those who do not fully meet all of the discipline criteria of its post-graduate training requirement. Currently, highly qualified physicians are denied application if they come from a jurisdiction around the world which does not provide post-graduate training in all of CPSM's disciplines. Applicants who have experience and have demonstrated competence in a discipline should not be denied license opportunities.

The college is planning to resolve part of this issue by the end of 2015 by introducing a review of post-graduate training through the first-step physiciansapply.ca website. There are no plans to broaden the CPSM's consideration of qualifications evident in professional work experience.

Many IMGs in Manitoba are spending years in an assessment process fraught with difficult, costly exams that result in no recognition and a career-ending currency of practice problem. This is deeply troubling and a tragic waste of human capital. Systemic change is needed to allow for the

more timely selection of those who will and those who will not be given an opportunity to gain Canadian residency experience.

The Fairness Commissioner has also recommended that the Medical Council of Canada (MCC) Evaluating Exam be eliminated. The Evaluating Exam is a mandatory, \$1,650 predictor exam that holds no weight determining an individual's qualification to practice medicine in Canada. Its purpose is solely to predict success on the exam that follows. MCC has recently introduced an online, low-cost (\$88) and non-mandatory predictor assessment for the Evaluating Exam. Low-cost predictors and self-assessment tools can be a real benefit; however, in this circumstance it is functioning as a predictor for another predictor with limited value.

The MCC is in consultation with provincial regulators to explore phasing out the Evaluating Exam. A federally funded project to offer MCC's more relevant Qualifying Exam abroad is underway. The MCC expects that the Evaluating Exam will be eliminated by the spring of 2019.

In 2013, the University of Manitoba's IMG Programs underwent a review, including participation from the Manitoba Fairness Commissioner. The review has recently been completed, and several issues raised by the Fairness Commissioner have not yet been addressed.

Progress has been achieved in a recent policy change to give preference to Manitoba resident applicants to the IMG program. This will help to ensure better retention of physicians in the province and reduce the large pool of Manitoba IMGs without licensure opportunities.

The Fairness Commissioner is recommending the IMG Program review the weighting of the requirements to enter the program. Currently a disproportionate value is given to an interview that subjectively determines a candidate's cultural suitability to practice in a rural environment in Manitoba. For success, we need to train and support cultural transitions. Remedies also need to be considered for Manitoba IMGs who would qualify for the IMG Program but have a practice currency issue.

Physician Registrations (2011-2014): Of the 580 IMGs that applied to CPSM, 52 (nine per cent) were fully licensed, 271 (47 per cent) remain in process, and 257 (44 per cent) either withdrew or were denied.

| | Fully Licensed | 52 |
|------|-----------------|-----|
| CPSM | In Process | 271 |
| | Withdrew/Denied | 257 |
| | Total | 580 |
| | | |
| | 9% | |

Fully Licensed

Withdrew/Denied

In Process

College of Audiologists and Speech Language Pathologists of Manitoba

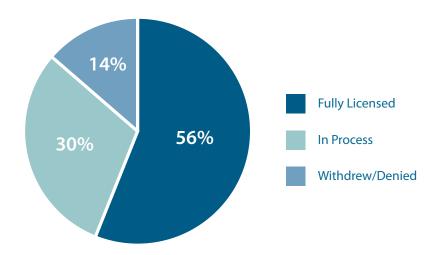
47%

44%

The College of Audiologists and Speech Language Pathologists of Manitoba (CASLPM) has 459 registered members with two full-time staff, and received 89 total applications including 66 internationally educated applicants in 2011-2014. The College has a history of providing accommodating, flexible assessment processes for internationally educated applicants. Those with qualifications that do not fully align with the required North American standards have opportunities to meet requirements through supervised practice. The College considers written reports and international licensing exams. It is also working on new, improved registration information that will be available on its website in 2015.

Audiologist and Speech Language Pathologist Registrations (2011-2014): Of the 66 IEAs that applied to CASLPM, 37 (56 per cent) were fully licensed, 20 (30 per cent) remain in process, and nine (14 per cent) either withdrew or were denied.

| CASLPM | Fully Licensed | 37 |
|--------|-----------------|----|
| | In Process | 20 |
| | Withdrew/Denied | 9 |
| | Total | 66 |



College of Dental Hygienists of Manitoba

The College of Dental Hygienists of Manitoba (CDHM) has 760 registered members with two full-time and one part-time staff, and received 185 total applications during 2011-2014. The College did a remarkable job working with the University of Manitoba, Faculty of Dentistry to establish a competency assessment and gap training program for internationally educated dental hygienists.

As well, CDHM significantly improved its registration information and has removed some unnecessary documentation requirements. A self-assessment is available that allows internationally educated individuals to compare their skills to those required of a dental hygienist in Canada.

A new national competency assessment for internationally educated dental hygienists is in development by the National Dental Hygiene Certification Board. The CDHM plans to have it replace the University of Manitoba's assessment. As the new assessment will not be available in Manitoba, this will reduce accessibility and increase costs for Manitoba applicants who will now have to travel for assessment. This is a step in the wrong direction and jeopardizes the College's notable 100 per cent success rate with its internationally educated applicants to date. Progress will be to keep the licensure processes accessible and affordable.

Dental Hygienist Registrations (2011-2014): Three IEAs were fully licensed.



College of Dietitians of Manitoba

The College of Dietitians of Manitoba (CDM) has 438 members with three part-time staff, and received 41 total applications including six internationally educated applicants during 2011-2014. The CDM has made significant improvements to web-based registration information for internationally educated dietitians. This includes an overview of the registration steps and checklist of required documents as well as information about the credential assessment, the practicum program, the national exam and the appeal process.

Work is underway to develop policies for alternative documentation. The College is considering accepting an applicant's visa or landed immigration status in lieu of a pre-migration criminal records check since these checks are completed for immigration purposes.

A self-assessment is available so that applicants can match their education and experience with practice competencies and requirements. The College provides a practicum program to allow applicants with gaps an opportunity to meet qualification requirements.

Dietitian Registrations (2011-2014): Of the six IEAs that applied to the CDM, one (17 per cent) was fully licensed.

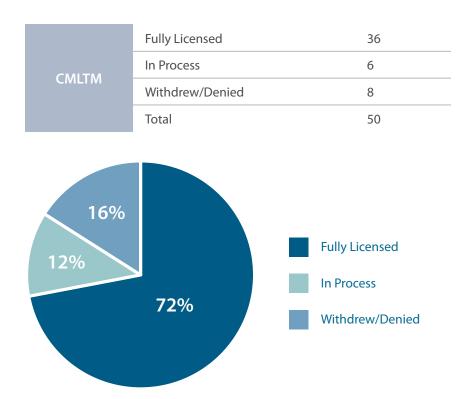
College of Medical Laboratory Technologists of Manitoba

The College of Medical Laboratory Technologists of Manitoba (CMLTM) has 1,174 registered members with two full-time staff, and received 236 total applications including 50 internationally educated applicants from 2011-2014.

The college continues to improve an already strong information package for IEAs. Applicants also have access to a progressive Prior Learning Online Self-Assessment Tool that allows them to identify specific knowledge gaps to help them decide whether or not to pursue certification. The Canadian Society for Medical Laboratory Technologists recognizes professional work experience and factors in the results of the self-assessment tool. They have also developed alternative career information for those who may need to consider other occupations.

The CMLTM is concerned with low pass rates on the national certification exams for both domestically and internationally educated applicants. They are working with stakeholders raising the need for better exam preparation support. We encourage CMLTM to review the certification exams to ensure they are functioning as intended.

Medical Laboratory Technologist Registrations (2011-2014): Of the 50 IEAs that applied to CMLTM, 36 (72 per cent) were fully licensed, six (12 per cent) remain in process, and eight (16 per cent) either withdrew or were denied.



College of Midwives of Manitoba

The College of Midwives of Manitoba (CMM) has 68 registered members with one full-time and two part-time staff, and received 90 applications, including 75 internationally educated applicants, during 2011-2014. The licensure process for internationally educated midwives has been in a state of transition over the last three years. From 2011-2013 when it ceased operations, CMM used the Multi-jurisdictional Midwifery Bridging Program (MMBP) to assess and gap train IEAs. For Manitoba IEAs, this program was inaccessible and expensive involving an eight-week, out-of-province travel commitment. No IEAs from Manitoba successfully completed the MMBP program.

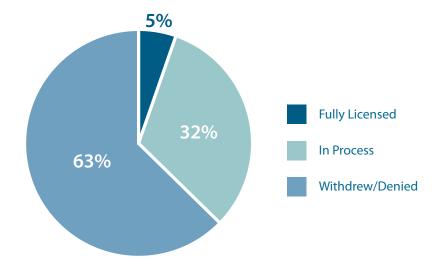
Manitoba's midwifery education program at the University College of the North has struggled to establish itself. Work is now underway to move the midwifery program to the University of Manitoba.

A new assessment program for internationally educated midwives has been developed with support from Manitoba Health, Healthy Living and Seniors. The Manitoba Assessment and Gap Training Pilot Program involves exams and clinical assessment followed by academic and clinical gap training in Manitoba. Six IEAs are expected to complete the program in 2015 and be eligible for licensure. Beyond this pilot phase, the future of this program is uncertain.

Given the shortage of practitioners in the province and the number of IEMs Manitoba receives, the CMM needs to establish an efficient, affordable and locally accessible licensure pathway for IEMs.

Midwife Registrations (2011-2014): Of 75 IEAs that applied to CMM, four (five per cent) received full registration, 24 (32 per cent) remain in process and 47 (63 per cent) either withdrew or were denied.

| СММ | Fully Licensed | 4 |
|-----|-----------------|----|
| | In Process | 24 |
| | Withdrew/Denied | 47 |
| | Total | 75 |



College of Occupational Therapists of Manitoba

The College of Occupational Therapists of Manitoba (COTM) has 700 registered members with one full- time and two part-time staff, and received 136 total applications including nine internationally educated applicants during 2011-2014. COTM-supervised practice registry for internationally educated occupational therapists is a progressive practice that allows a timely, effective and efficient way to address gaps while working in the field. Individuals with gaps in currency of practice, language proficiency and academics can complete learning plans and assessments in the field.

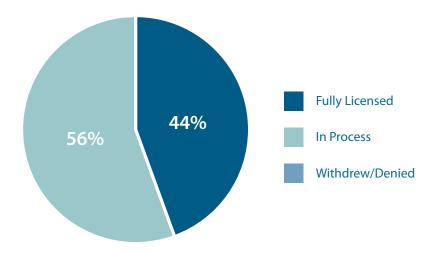
The COTM has done work improving their information package and provides strong personal support and assistance for IEAs.

As of May 2015, COTM requires IEAs to undergo the Association of Canadian Occupational Therapy Regulatory Organizations' new multi-stage assessment process. IEAs have their professional work experience assessed and need to complete a competency assessment. Any gaps identified need to be addressed with academic upgrading prior to making an application to the COTM.

Although the impact the new national assessment will have on COTM's supervised practice registry for IEAs is not yet fully clear, the college will need to ensure it does not result in longer licensure timelines for IEAs and the loss of one of Manitoba's most progressive, efficient licensure programs.

Occupational Therapist Registrations (2011-2014): Of the nine IEAs that applied to COTM, four (44 per cent) were fully licensed, and five (56 per cent) remain in process.

| СОТМ | Fully Licensed | 4 |
|------|-----------------|---|
| | In Process | 5 |
| | Withdrew/Denied | 0 |
| | Total | 9 |



College of Pharmacists of Manitoba (CPhM)

The College of Pharmacists of Manitoba (CPhM) has 1,631 registered members with eight full-time staff, and received 466 applications including 206 internationally educated applicants during 2011-2014.

The licensure process for international pharmaceutical graduates has many progressive features.

IEAs have access to the Pharmacists Gateway Canada website, launched in 2014 by the National Association of Pharmacy Regulatory Authorities. The website provides comprehensive, applicant-friendly registration information and allows people to track their documents and supports a streamlined application process with CPhM.

Licensure for IEAs involves a two-step process: successfully completing national exams and then a CPhM internship program. Many IPGs struggle with the first step, the Pharmaceutical Examining Board of Canada (PEBC) certification process that involves successfully completing an evaluating exam and then a two-part qualifying exam.

The evaluating exam tests for general academic pharmaceutical knowledge and Canadian pharmacy practice. Its purpose is to sort those applicants with knowledge similar to what is expected of a graduate of a Canadian pharmaceutical program.

Prior to the introduction of the evaluating exam, people with international pharmaceutical degrees were allowed to directly challenge the qualifying exam. Those with gaps identified in academic program were first required to complete upgrading coursework. For IEAs, the evaluating exam is an unnecessary cost and delay. The Fairness Commissioner has called for a review of the relevance and necessity of the evaluating exam and a consideration of alternative eligibility routes for IEAs to challenge the qualifying exams.

PEBC's two-part qualifying exam involves an intense, practice-oriented scrutiny of knowledge, skill and judgment and is required for both internationally educated pharmacists and graduates of Canadian programs. Graduates of Canadian pharmacy programs are prepped for this exam as part of their academic training. Many competent, mid-career Canadian pharmacists would not successfully complete the qualifying exam without a return to study.

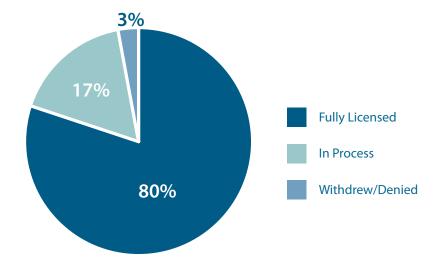
Some IEAs will audit pharmacy courses to learn about subject matter areas targeted on the exam to increase their chances of success. Better orientation and preparation support is needed for IEAs to improve outcomes on PEBC exams.

Once PEBC certified, CPhM provides an internship program that supports timely entry into practice. The CPhM has further strengthened its internship program, introducing a new Internship Manual with assessment criteria and guidelines, as well as a Preceptor Training Workshop for Pharmacists and preceptor training video. To facilitate IPGs securing internships, employer information has been introduced on the CPhM website.

Pharmacist Registrations (2011-2014): Of the 206 IEAs that applied to CPhM, 165 (80 per cent) were fully licensed, 35 (17 per cent) remain in process, and six (three per cent) either withdrew or were denied.

High licensure rates are expected for regulators where the assessment process is largely completed before application to the provincial regulator. In this case, IEAs had to get PEBC certification before application to CPhM.

| CPhM | Fully Licensed | 165 |
|------|----------------|-----|
| | In Process | 35 |
| | Withdrew | 6 |
| | Total | 206 |



College of Physiotherapists of Manitoba

The College of Physiotherapists of Manitoba (CPM) has 933 registered members with four full-time and one part-time staff, and received 149 applications including 10 internationally educated applicants during 2011-2014. The College has recently made improvements to its licensure process for internationally educated physiotherapists. Since 2013, a new Prior Learning Assessment process is in place that allows for the recognition of work experience and supplements the assessment of academic qualifications necessary to qualify to write the national exam. Qualified individuals may even have the national exam waived.

IEAs have access to an improved, streamlined assessment process through the Canadian Alliance of Physiotherapy Regulators. As a result of a review, the national body removed several weak relevant requirements, including a line-by-line comparison of course curriculum and previous registration documentation. Early results for the new process are impressive. The national body's assessment was shortened from six-to-12 months to five-to-seven weeks, a 70 per cent timeline reduction for IEAs.

The CPM has improved its registration information with the introduction of a dedicated IEA web portal. It links to the national body's clear and effective information for IEAs. A notable innovation includes source country profiles that allow people to see the national exam pass rates of applicants from the same country of education as well as specific comparisons of international education programs. As exam pass rates vary by source country, from 10 per cent to 90 per cent, this critical information will assist applicants to prepare and make informed decisions.

Physiotherapist Registrations (2011-2014): Of the 10 IEAs that applied to CPM, four (40 per cent) were fully licensed.

College of Podiatrists of Manitoba

The College of Podiatrists of Manitoba (COPOM) has 32 registered members with one full-time and one part-time staff. The registration process is timely and cost-effective as no regulatory exams or internship period are involved.

The COPOM recently adopted PhD level training as its qualification requirement in agreement with other provinces and international trends. All COPOM applicants are internationally educated PhDs since there are no English podiatry programs in Canada and only one Francophone program in Quebec.

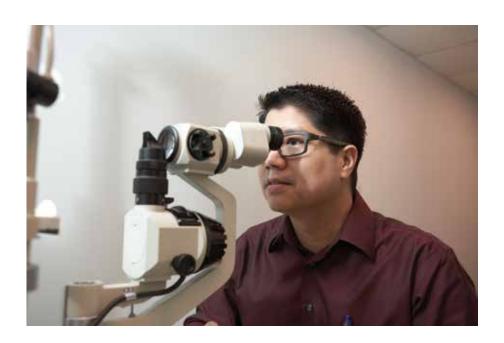
The College of Podiatrists of Manitoba has improved its registration information for applicants. It also has a fair criminal records policy that recognizes the security check conducted by the federal government as a condition of immigration. Criminal records checks are now only needed for the applicant's time in Canada.

Two IEAs were fully licensed during 2011-2014.

Denturist Association of Manitoba

The Denturist Association of Manitoba has 54 registered members with one part-time staff, and received five applications during 2011-2014. The assessment and registration process for internationally educated denturists has many progressive features. Professional work experience is assessed, a practical competency assessment is in place and supervised internships are available. As well, the Denturist Association of Manitoba has committed to improving its registration information.

Two IEAs were fully licensed during 2011-2014.



Manitoba Association of Optometrists

The Manitoba Association of Optometrists (MAO) has 152 registered members with three full-time staff, and received 28 applications including 12 internationally educated applicants during 2011-2014. The MAO licensure process is costly and not readily accessible for internationally educated optometrists. IEAs in Manitoba are required to complete an expensive, \$8,000-\$40,000, out-of-province bridge training program.

Fair practice would involve providing assessments and gap training for the IEAs in Manitoba. The MAO is working to improve registration information for IEAs on its website.

Optometrist Registrations (2011-2014): Of the 12 IEAs that applied to MAO, nine (75 per cent) were fully licensed.

Manitoba Association of Registered Respiratory Therapists

The Manitoba Association of Registered Respiratory
Therapists (MARRT) has 314 registered members with two
part-time staff, and received 56 applications during 20112014. The MARRT currently does not provide internationally
educated respiratory therapists a timely, cost-effective

licensure process. Manitoba IEAs are assessed and if necessary, gap trained out-of-province. Many people, however, are not in a position to leave Manitoba for an extended period to be licensed.

The MARRT recognizes the problem and has committed to working towards a more efficient, accessible licensure process for IEAs. Activity is underway nationally with other provincial regulators to develop new assessment tools that will support assessment in Manitoba. MARRT is working with the University of Manitoba to see what remedial coursework may be offered locally. The association will also be introducing an improved information package for internationally educated applicants on its website shortly.

One IEA was fully licensed by MARRT in 2011-2014.

Manitoba Chiropractors Association

The Manitoba Chiropractors Association (MCA) has 285 registered members with two full-time and three part-time staff, and received 29 applications including 25 internationally educated applicants during 2011-2014. The MCA has made progress streamlining its documentation requirements, and synchronizing with the Canadian Chiropractic Examining Board. Applicants no longer have to arrange for their educational institution and regulating authority to submit the same documents twice, once to the national body and then again to MCA. Documents such as notarized passport photos and undergraduate education transcripts are no longer required. Applicants no longer have to provide criminal records checks from their home jurisdictions if they are landed immigrants.

The MCA recently introduced more complete information for internationally educated chiropractors about financial supports, appeals, access to records and language proficiency requirements.

Chiropractor Registrations (2011-2014): All 25 IEAs that applied to MCA received licensure. Twenty-three of them were trained in the United States and two in Australia.

Manitoba Dental Association

The Manitoba Dental Association (MDA) has 1,959 registered members with six full-time and two part-time staff, and received 75 applications, including 15 internationally educated applicants during 2011-2014. The MDA licensure process for internationally educated dentists (IEDs) has made progress over the last several years; however, challenges remain.

The MDA's licensure process for IEDs underwent a major transition in 2011 with the introduction of the National Dental Examining Board of Canada's (NDEB) Equivalency Process. Prior to 2011, only graduates of accredited dental programs recognized by the NDEB were eligible to write the national exam. The Commission on Dental Accreditation of Canada has mutual recognition agreements in place with five international jurisdictions: United States, United Kingdom, Ireland, New Zealand and Australia. The only option for IEAs trained outside these jurisdictions was to return to a Canadian university to complete the last two years of a dental degree program. Entrance into dental completion programs is highly competitive and costly. The Faculty of Dentistry's program at the University of Manitoba has seven seats for IEAs at a cost of just over \$100,000.

The NDEB's Equivalency Process gives IEDs an opportunity to demonstrate the equivalence of their academic training by writing three exams: the Assessment of Fundamental Knowledge Exam, the Assessment of Clinical Skills and the Assessment of Clinical Judgment. Upon successful completion of these exams, IEAs are eligible to write the NDEB national exams similar to Canadian dental graduates, IEAs from accredited programs and IEAs completing dental degrees programs.

To date, the Equivalency Process is not functioning well for IEAs. Success rates are very low, ranging from five per cent to 15 per cent for the 2011-2014 period. Commendably, the National Body posts exam pass rates on its website for applicants. To be successful, people need better preparation support and exposure to Canadian practice.

Furthermore, as the system of assessment currently functions, the IEAs who score highest on the first, Assessment of Fundamental Knowledge Exam, are the most likely to secure a competitive spot in a two-year dental completion program. As it currently functions, the system provides the most support and orientation to the most qualified and little or no support to those who need it more.

The Fairness Commissioner is calling for MDA to review the Equivalency Process to ensure better licensure opportunities for IEAs from unaccredited programs, opportunities that provide the right measure of support, training and orientation.

Several improvements to the Equivalency Process have been implemented, including more exam sittings, reduced exam fees and greater accessibility. As of 2015, the exams are offered twice a year and some can now be undertaken in locations abroad. The University of Manitoba, Faculty of Dentistry recently introduced a preparation course for two of the Equivalency Exams.

The association has a history of active involvement with its national body responsible for exams and assessment of IEAs. Registration information for IEAs has been improved on the MDA website.

Dentist Registrations (2011-2014): Of the 15 IEAs that applied to MDA, 14 (93 per cent) were fully licensed.

High licensure rates are expected for regulators where the assessment process is largely completed before application to the Manitoba regulator. In this case, applicants are assessed and certified by the NDEB before application to the MDA and few, if any, fail to receive registration at this point.

Manitoba Naturopathic Association

The Manitoba Naturopathic Association (MNA) has 26 registered members and one part-time staff. The MNA does not provide an accessible, timely and cost-effective licensure opportunity for internationally educated naturopaths.

There is no naturopathic education program in Manitoba. The MNA recognizes six academic programs: four in the United States and two in Canada. Applicants trained outside these programs must apply to one of Canada's programs for advanced standing and then complete any required coursework to achieve full standing before they can begin the registration process with MNA.

Although they have had no applications from internationally educated naturopaths in 2011-2014, MNA recognizes the need to develop the ability to assess people in an accessible, timely manner. A federal project to develop national competency standards is underway. It will lay the foundation for assessment tools and strategies to be built.

The MNA has committed to providing better registration information for internationally educated naturopaths, but progress remains slow.

Opticians of Manitoba

The Opticians of Manitoba (OOM) have 284 registered members with one full-time and one part-time staff, and received 35 applications including six internationally educated applicants during 2011-2014. The Opticians of Manitoba continues to improve its progressive licensure process. Professional work experience is assessed and supervised practice opportunities are available. The National Association of Canadian Opticians recently updated practice standards and guidelines, including an expert review of the prior learning assessment tools and a new training program for assessors.

The OOM led an initiative to provide applicants an opportunity to complete its interview out-of-country. This process was adopted by the profession across Canada in November 2014. They also made improvements to appeal information and introduced detailed written reasons for unfavourable assessment decisions. Overall, Opticians Manitoba provides comprehensive, user-friendly information for internationally educated opticians.

The OOM received a 2014 Pearl Award from the Manitoba Association of Prior Learning and Assessment Network

for their work developing a progressive prior learning assessment process.

Optician Registrations (2011-2014): Of the six IEAs that applied to OOM, three (50 per cent) were fully licensed.

Psychological Association of Manitoba

The Psychological Association of Manitoba (PAM) has 312 registered members with two part-time staff, and received 34 applications including nine internationally educated applicants during 2011-2014. PAM provides a timely and flexible licensure process for psychologists educated in the North American clinical model. Professional work experience is recognized and supervised practice and academic upgrading can occur under conditional registration and various types of licenses.

The association has made progress improving registration and appeal information. They have streamlined documentation requirements so that people no longer have to arrange for the submission of documents twice, once to a credential assessment agency and then again to the PAM. Formalized assessment criteria for PAM's interview have been put in place to support transparency and objective assessments. Applicants can now track the status of their applications with the Association of State and Provincial Psychology Boards.

The PAM is currently transitioning under *The Regulated Health Professions Act* and its licensing regime will move from "right to title" to "right to title and practice." This will mean anyone engaged in the practice of psychology in Manitoba will need to be registered with PAM. Previously individuals could practice psychology without registration so long as they did not represent themselves as psychologists or refer to their activity as psychological. This transition may have significant implications for internationally educated practitioners working in the field not trained in the North American clinical model.

Psychologist Registrations (2011-2014): Of the nine IEAs that applied to PAM, five (56 per cent) were fully licensed.



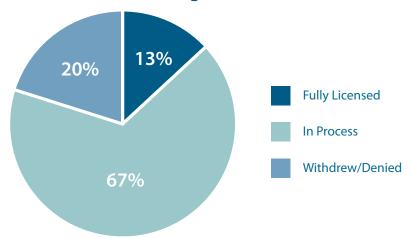
Progress in Science, Technical, Legal and Financial Professions

This section provides progress statements for each of the 10 Manitoba science, technical, legal and financial regulators subject to *The Fair Registration Practices in Regulated Professions Act*.

Compared to the health professions, licensure processes in the science, technical, legal and financial professions tend to be more flexible with timelier entry to employment. A few of these professions are governed by "right to title" legislation including Chartered Professional Accountants and Engineering and Applied Science Technicians and Technologists. This allows a person to work in the field as long as they do not identify themselves by or use a professional title. Other professions with "right to title and practice" legislation permit professional work in some capacity as long as it occurs under the supervision of a registered member. These professions include architects, agrologists, engineers and geoscientists, land surveyors and lawyers.

Of 2,441 internationally educated applicants to science, technical, legal and financial professions in the 2011-14 period, 320 (13 per cent) received full licensure, 1,630 (67 per cent) remain in process, and 491 (20 per cent) either withdrew or were denied by the end of December 2014.

Science, Technical, Legal and Financial



Association of Manitoba Land Surveyors

The Association of Manitoba Land Surveyors (AMLS) has 56 registered members with one full-time staff, and received 12 applications during 2011-2014. The AMLS does not provide internationally educated land surveyors timely licensure opportunities in Manitoba. The process takes an estimated five to seven years.

Currently, to be academically certified, international applicants must pass the Canadian Board of Examiners of Professional Surveyors' numerous technical confirmatory exams or take approved academic coursework.

The AMLS is working to improve opportunities for academic certification by lobbying for more academic courses in Manitoba and online access to courses from out-of-province educational institutions.

The association is also taking significant steps to improve its two-year articling program. New legislation will allow AMLS to recognize professional work experience, permit exam exemptions and waive parts of its articling program.

Improved registration information is now available and a handbook to support IEAs with articling exams is in development. The progressive actions undertaken by the AMLS, however, are not likely to be sufficient to result in licensed internationally educated land surveyors. Difficulties surrounding academic certification by the national body need to be addressed with stronger action before improvements to the articling program will provide results. The Fairness Commissioner has called for AMLS to consider an alternative assessment strategy. There were no registrations of IEAs in 2011-2014.

Association of Professional Engineers and Geoscientists of Manitoba

The Association of Professional Engineers and Geoscientists of Manitoba (APEGM) has 7,451 registered members with 13 full-time and one part-time staff, and received 1,470 applications including 685 internationally educated applicants during 2011-2014. The APEGM continues to make progress evolving licensure practices for internationally educated engineers and geoscientists.

By way of mutual recognition agreements and accords established by Engineers Canada, the APEGM recognizes the equivalence of academic qualifications from numerous jurisdictions around the world. This recognition provides timely entry into practice for a significant number of Manitoba IEAs.

IEAs with academic qualifications earned outside of APEGM's recognized jurisdictions have a variety of pathways to be deemed academically qualified. Options include completing exams, academic coursework, an interview for those with at least 10 years of professional experience, and the University of Manitoba's one-year Internationally Educated Engineers Qualification program. Currently, APEGM is moving to accept a national exam from the United States (NCCEES Fundamentals of Engineering Exam) as an additional pathway to confirm academic qualification.

The APEGM has introduced a dedicated staff member to advice and support its IEAs. They have put in place a progressive "reconsideration" or pre-appeal process which

several Manitoba regulators now emulate. Improved registration material is now available on the APEGM website.

Recently the APEGM proposed to government, an amendment to its legislation to introduce a limited scope of practice license and title that will allow some international applicants a much timelier path into practice.

In 2008, APEGM made an important shift in how international academic qualifications are assessed. Truer to the nature of knowledge and skills practiced in the field, the association moved to require academic qualification in two areas of discipline. As a result, IEAs are assigned no more than six exams. Previously, the assignment of a dozen or more exams was not uncommon.

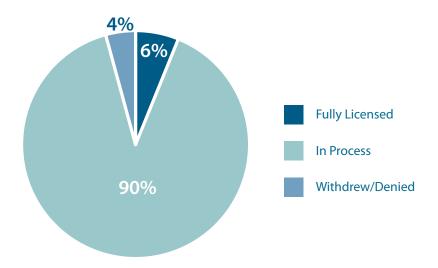
Despite significant progress and several pathways to licensure, some substantive fairness issues remain to be addressed:

- The pathways to confirm academic qualification are not timely or accessible for the majority of IEAs applying to APEGM. OMFC data indicates approximately 75 per cent of them need to confirm academic qualification. Few competent mid-career Canadian engineers could pass confirmatory exams without a return to study. Completing academic coursework or the IEEQ Bridging Program is costly and many IEAs are not in a position to return to university to study.
- The APEGM's interview option is more timely and accessible, but it is restricted to applicants with at least 10 years of professional experience. Several provincial regulators offer the interview option for applicants with far less than 10 years of professional work experience.
- For the purposes of its four-year Members-in-Training Program, APEGM recognizes international professional work experience and will waive up to three years of the program. One year of Canadian experience is a mandatory requirement, regardless of the extent and accomplished nature of the individual's international professional experience.

The Fairness Commissioner has recommended APEGM do more to assess qualifications evident in professional work experience. The association should reduce its restrictive 10-year requirement currently needed before applicants are deemed eligible for an interview. IEAs with professional experience similar to the Canadian engineering marketplace merit full recognition.

Engineer Registrations (2011-2014): Of the 685 IEAs that applied to APEGM, 42 (six per cent) were fully licensed, 614 (90 per cent) remain in process, and 29 (four per cent) either withdrew or were denied.

| APEGM | Fully Licensed | 42 |
|-------|-----------------|-----|
| | In Process | 614 |
| | Withdrew/Denied | 29 |
| | Total | 685 |





Chartered Professional Accountants Manitoba Joint Venture

Manitoba's three accounting regulators, the Institute of Chartered Accountants of Manitoba, Certified General Accountants Association of Manitoba, together with the Society of Management Accountants of Manitoba are currently merging under a new designation of Chartered Professional Accountants (CPA) Manitoba Joint Venture. New legislation merging the accounting bodies was proclaimed September 1, 2015.

The Institute of Chartered Accountants of Manitoba had 3,006 members with eight full-time and two part-time staff, and received 1,322 total applications including 66 internationally educated applicants during 2011-2014.

The Certified General Accountants Association of Manitoba had 2,242 registered members with 21 full-time and one part-time staff, and received 2,386 applications including 565 internationally educated applicants.

The Society of Management Accountants of Manitoba had 1,813 registered members with 10 full-time staff, and received 1,166 applications including 465 internationally educated applicants in 2011-2014.

The former licensing processes in these three accounting professions were progressive. They provided a work-while-you-study structure that supported timely entry into practice with flexible academic upgrading opportunities. Professional experience was recognized and could be credited toward reduced requirements. Licensure in the accounting professions in Manitoba has right to title and this allows people the opportunity to work in the field so long as they do not represent themselves as registered chartered, management or general certified accountants.

The new CPA licensing process resembles the former programs, including the work-while-you-study structure. It introduces a new Advanced Certificate in Accounting and Finance that will support recognition for IEAs with bachelor-level accounting and finance degrees. Reasonable transition policies have been put in place so that people enrolled in the legacy accounting licensing processes are not delayed as a result of the merger.

Internationally educated accountants in Manitoba have access to CPA Canada's Business Culture Course and Manitoba's Professional Practice Seminars.

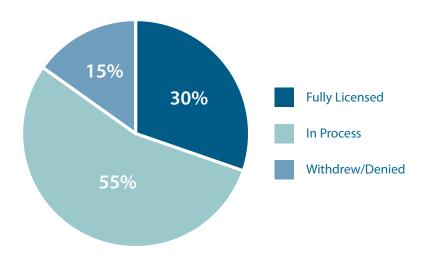
All three legacy programs (CGA, CA, CMA) used to have strategies to assess and recognize IEA work experience. If qualified, elements of the programs were waived and a faster licensure process was possible. An issue with the new CPA program is the failure to recognize professional work experience. This means highly qualified accountants may be subjected to redundant coursework and professional training.

Manitoba's accounting bodies see the need to recognize international professional work experience and, along with accounting bodies from the Western provinces, are participating in a working group to review this concern.

Institute of Chartered Accountants of Manitoba

Registrations (2011-2014): Of the 66 IEAs that applied to ICAM, 20 (30 per cent) were fully licensed, 36 (55 per cent) remain in process, and 10 (15 per cent) either withdrew or were denied.

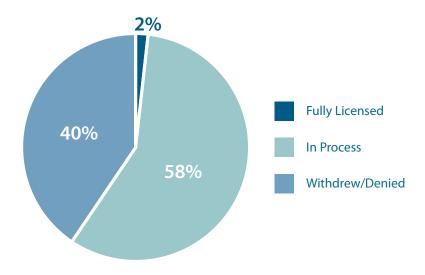




Certified General Accountants Association of Manitoba

Registrations (2011-2014): Of the 565 IEAs that applied to CGA Manitoba, 10 (two per cent) were fully licensed, 326 (58 per cent) remain in process, and 229 (40 per cent) either withdrew or were denied.

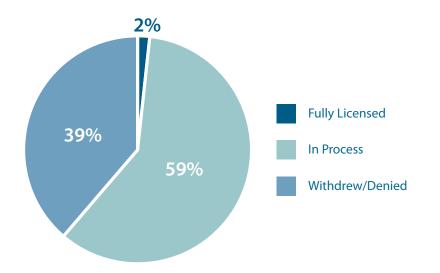
| CGA | Fully Licensed | 10 |
|-----|-----------------|-----|
| | In Process | 326 |
| | Withdrew/Denied | 229 |
| | Total | 565 |



Society of Management Accountants of Manitoba

Registrations (2011-2014): Of the 465 IEAs that applied to the SMAM, eight (two per cent) were fully licensed, 277 (59 per cent) remain in process, and 180 (39 per cent) either withdrew or were denied.

| SMAM | Fully Licensed | 8 |
|------|-----------------|-----|
| | In Process | 277 |
| | Withdrew/Denied | 180 |
| | Total | 465 |



Certified Technicians and Technologists Association of Manitoba

Certified Technicians and Technologists Association of Manitoba (CTTAM) has 3,184 registered members (2014) with four full-time staff, and received 999 applications, including 445 internationally educated applicants during 2011-2014. The CTTAM provides effective, flexible and timely licensure opportunities for internationally educated technicians and technologists. As a right to title license, IETTs can work in the field without licensure so long as they do not call themselves registered technicians or technologists.

Internationally educated technicians and technologists can have their professional work experience considered in the determination of academic qualification. A Technical Report Writing Course at Red River College gives applicants the necessary skills to complete a technical report, a key licensure requirement for the Technologist designation.

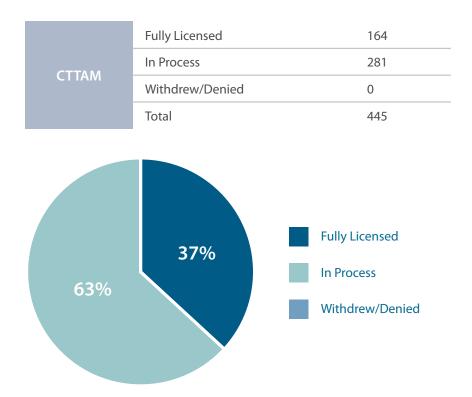
The CTTAM provides strong personal support and assistance to applicants. Licensure costs are low and application fees will be refunded if the person is not qualified.

The association has improved its registration information and links to the new Canadian Technology Immigration Network. The Network provides IEAs access to dedicated professional orientation, self-assessment, and licensure and employment information. Applicants also benefit from the recognition of academic qualifications supported by the Canadian Council of Technicians and Technologists' International Qualifications Data Base that contains 8000 programs in 60 countries that are recognized.

Currently all IEAs, regardless of qualification and professional work experience, require a mandatory year of Canadian experience for licensure.

Many internationally educated engineers benefit from the certification opportunity provided by CTTAM as they pursue licensure as a professional engineer.

Engineering Technician and Technology Registrations (2011-2014): Of the 445 IEAs that applied to CTTAM, 164 (37 per cent) were fully licensed, and 281 (63 per cent) remain in process. None withdrew or were denied.



Law Society of Manitoba

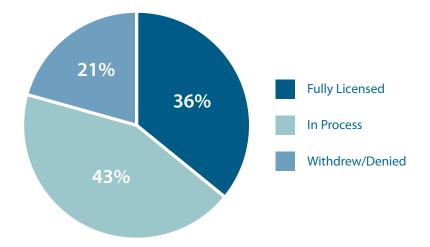
The Law Society of Manitoba (LSM) has 4,254 registered members with 31 full-time and 10 part-time staff, and received 414 applications including 92 internationally educated applicants during 2011-2014. The LSM excels at procedural fairness with clear information, well articulated policies, evaluation criteria, written reasons for unfavourable assessment decisions and review opportunities.

The licensure process for internationally educated lawyers, however, is not timely. Many IEAs take three to five years. Acquiring academic certification from the National Certification Association is the biggest challenge for IEAs as it often requires an extended return to study before they apply to an articling program. The Fairness Commissioner has called for a review of NCA academic certification. Faster academic certification would be a major step forward.

The LSM's articling program, the Canadian Centre for Professional Legal Education Program in Manitoba, provides a variety of supports and accommodations for IEAs. With a focus on training and remedial support, rather than screening, IEAs have experienced high success rates. The majority complete the two-year program on time. The Law Society of Manitoba recently introduced an exemption process that allows applicants to have the articling program waived in whole or in part based on their professional experience.

Lawyer Registrations (2011-2014): Of the 92 IEAs that applied to the LSM, 33 (36 per cent) were fully licensed, 40 (46 per cent) remain in process, and 19 (21 per cent) either withdrew or were denied.





Manitoba Association of Architects

The Manitoba Association of Architects (MAA) has 475 registered members with two full-time staff, and received 85 applications including 26 internationally educated applicants during 2011-2014. The MAA and the profession nationally, have made remarkable, substantive progress with the Broadly Experienced Foreign Architect Program (BEFA). BEFA is a great example of how a licensure process can be made timely and cost-effective with a shift in focus to professional work experience. Internationally educated architects with a professional degree and at least seven years of qualifying experience undergo a rigorous prior learning/interview assessment process and can be licensed within two years. This is a timely alternative to the more conventional Triple E (education, experience and exams) licensure process that can take up to a decade to complete. The MAA played an active, leadership role in the development and piloting of BEFA.

Internationally educated architects have access to the Royal Architectural Institute of Canada's Syllabus Program that allows applicants an opportunity to fill gaps with specific coursework to meet academic qualification. This means people are not blocked by limited academic course availability commonplace in professional academic programs.

Since 2008, the Canadian Architectural Certification Board has been a signatory to the Canberra Accord. The Accord benefits IEAs as it recognizes the equivalency of international academic programs. Mutual recognition agreements support timely licensure as returning to study to secure recognition of academic qualification can be a significant barrier.

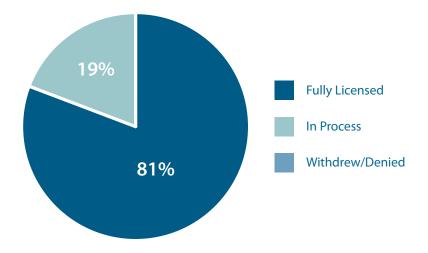
In 2014, the Canadian Architectural Certification Board finalized two tri-national mutual reciprocity agreements with Mexico and the United States, and a second with Australia and New Zealand. These agreements will support the recognition of similar regulatory assessments between these jurisdictions.

The MAA provides strong personal support and assistance and has made improvements to its registration information for IEAs. An appeal process for assessment and registration decisions remains a work in progress.

As many internationally educated architects do not possess the broad range of experience required to qualify for the BEFA licensure program, further progress in this profession would be to adapt BEFA's assessment tools and approach to support a timelier process for this group as well.

Architect Registrations (2011-2014): Of the 26 IEAs that applied to MAA, 21 (81 per cent) were fully licensed and five (19 per cent) were in process.







Manitoba Institute of Agrologists

The Manitoba Institute of Agrologists (MIA) has 658 registered members with two full-time and one part-time staff, and received 213 applications including 78 internationally educated applicants during 2011-2014. The institute has made remarkable progress improving its licensure practice for internationally educated agrologists. IEAs have access to a gap training process where they can complete individual learning plans while they work in the field.

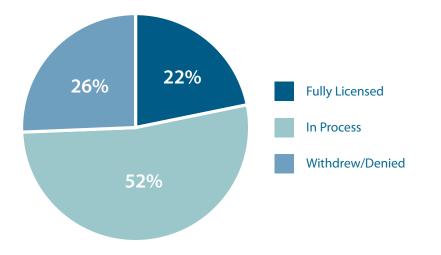
IEAs also have access to the University of Manitoba's one-year Internationally Educated Agrologists Program. Graduates of the program have been very successful with 90 per cent securing professional employment. The MIA was actively involved in developing the program and recognizes graduates as meeting its qualification requirements. Unfortunately, funding issues put the future of the IEAP at risk.

The MIA has worked to develop policies and procedures for its gap training process. Registration information is also improved.

The Fairness Commissioner has recommended MIA develop professional agrologist competencies. The institute recognizes the need and is collaborating with Agrologists Canada (national body) to develop them. This work is important because it lays the foundation for the MIA's ability to assess qualification evident in professional work experience and strengthens their ability to recognize the equivalence academic qualifications.

Agrologist Registrations (2011-2014): Of the 78 IEAs that applied to MIA, 17 (22 per cent) were fully licensed, 41 (52 per cent) remain in process, and 20 (26 per cent) either withdrew or were denied.







Manitoba Veterinary Medical Association

The Manitoba Veterinary Medical Association (MVMA) has 384 registered members with three full-time and two part-time staff, and received 49 applications including 18 internationally educated applicants during 2011-2014. Internationally educated veterinarians benefit from a few progressive aspects of the MVMA licensure process.

The Canadian Veterinary Medical Association recognizes an extensive list of international veterinary academic programs around the world. Temporary licensure is possible for those who have completed the first two national exams, the Basic and Clinical Sciences Exam and the North American Veterinary Licensing Exam. These allow IEAs to work under supervision for up to two-years until they complete the final Clinical Proficiency Exam. IEAs can access an MVMA seminar with professional orientation and preparation for its jurisprudence exam.

The MVMA is currently working to improve its registration information and a new dedicated web page is expected in 2015.

A major issue for IEAs is the difficulties posed by the final Clinical Proficiency Exam which is a seven-day, \$8,064 objective structured clinical exam. IEAs often cannot obtain the appropriate clinical placement opportunities for the right type of exposure to Canadian practice before attempting the exam. The Canadian Veterinary Medical Association is introducing a pre-test to provide feedback about an individual's readiness for the Clinical Proficiency Exam. Opportunities for exposure to clinical practice are needed for IEAs to be successful.

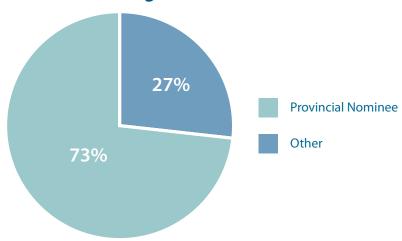
Veterinarian Registrations (2011-2014): Of the 18 IEAs that applied to MVMA, five (28 per cent) were fully licensed and nine (50 per cent) remain in process.



Data Findings

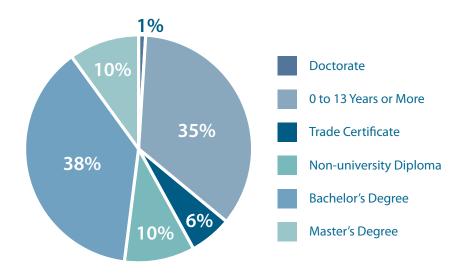
Manitoba continues to successfully implement the Growing through Immigration Strategy as part of provincial economic development and a contributor to the vitality and diversity of communities and workplaces. Manitoba's Provincial Nominee Program accounted for 73 per cent (42,914) of the total of 58,600 immigrants who arrived during 2011-2014.

Manitoba Immigrants 2011-2014



Source: Citizenship and Immigration Canada Landings data

Of economic class immigrants to Manitoba who are over 25 years of age, 23,209 (65 per cent) have post-secondary education.



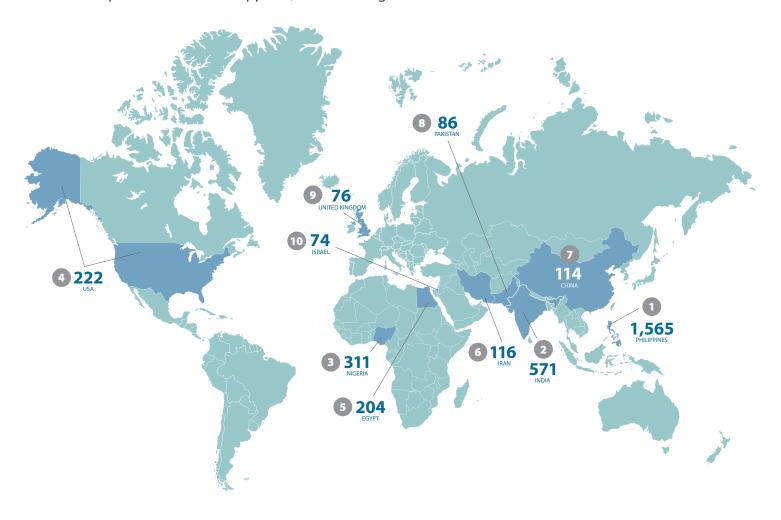
Source: Citizenship and Immigration Canada Landings data

The professions receiving the largest number of permanent residents arriving during the 2011-2014 period were accountants, registered nurses and teachers.

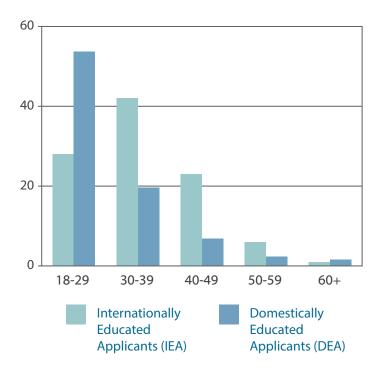
| Self-regulated Profession | Total Landings 2011- 2014 |
|----------------------------------|------------------------------|
| Accountants | 1,463 |
| Registered Nurses | 1,206 |
| Teachers | 826 |
| Engineers and Geoscientists | 596 |
| Technicians and Technologists | 589 |
| Physicians and Surgeons | 230 |
| Pharmacists | 164 |
| Dentists | 101 |
| Agrologists | 91 |
| Architects | 73 |
| Licensed Practical Nurses | 72 |
| Medical Laboratory Technologists | 61 |
| Lawyers | 44 |
| Physiotherapists | 39 |
| Midwives | 27 |

Source: Citizenship and Immigration Canada landings data

Based on regulator data, the top countries of education for the 4,848 internationally educated applicants in the 2011-2014 period were the Philippines, India and Nigeria.



Internationally educated applicants tend to be older than domestically educated applicants. Their professional work experience gained before coming to Manitoba is significant.



Source: Manitoba Regulator Data 2011-2014

These regulators registered more internationally educated than domestically educated applicants.

| Regulator | Licensed Internationally Educated Applicants | Licensed Domestically Educated Applicants |
|--|---|--|
| College of Audiologists and Speech Language Pathologists of Manitoba | 37 | 14 |
| College of Podiatrists of Manitoba | 2 | 0 |
| Denturist Association of Manitoba | 2 | 0 |
| Manitoba Chiropractors Association | 25 | 4 |
| Manitoba Association of Architects | 21 | 0 |

Source: Manitoba Regulator Data 2011-2014

This reliance on international talent may be due to international agreements, lack of Canadian professional schools or specific trends within the profession.

For the period 2011-2014 the following regulators received the largest numbers of internationally educated applicants, representing 83.6 per cent of total applications from internationally educated professionals to Manitoba regulators. 15.2 per cent of these applicants were fully licensed in the same period.

| Regulator | Total Internationally Educated Applicants | Total Full Licenses |
|--|--|------------------------|
| Association of Professional Engineers and Geoscientists of Manitoba | 685 | 42 (6.1%) |
| College of Licensed Practical Nurses of Manitoba | 625 | 67 (11.0%) |
| College of Physicians and Surgeons of Manitoba | 580 | 52 (9.0%) |
| Certified General Accountants Association of Manitoba | 565 | 10 (1.8%) |
| College of Registered Nurses of Manitoba | 480 | 109 (22.7%) |
| Society of Management Accountants of Manitoba | 465 | 8 (1.7%) |
| Certified Technicians and Technologists Association of Manitoba | 445 | 164 (36.9%) |
| College of Pharmacists of Manitoba | 206 | 165 (80.0%) |

Source: Manitoba Regulator Data 2011-2014

In professions where there are high numbers of IEAs, the importance of fair registration practice is heightened.



Regulatory Bodies by the Numbers

| Regulatory Body | Registered members 2014 | | aff 14 | Applications 2011-2014 | | | |
|---|-------------------------------|----|-----------|---------------------------|--|---|---------------------------------|
| | | FT | PT | Total Applicants | Total Internationally Educated Applicants | Total provisionally licensed IEAs | Total fully licensed IEAs |
| Association of Manitoba Land Surveyors | 56 | 1 | | 12 | | | |
| Association of Professional Engineers and Geoscientists of the Province of Manitoba | 7,451 | 13 | 1 | 1,470 | 685 | 198 | 42 |
| Certified General Accountants Association of Manitoba | 2,242 | 21 | 1 | 2,386 | 565 | | 10 |
| Certified Technicians and Technologists Association of Manitoba Inc. | 3,184 | 4 | | 999 | 445 | 272 | 164 |
| College of Audiologists and Speech Language Pathologists of Manitoba | 459 | 2 | | 89 | 66 | 16 | 37 |
| College of Dental Hygienists of Manitoba | 760 | 2 | 1 | 185 | | | 3 |
| College of Dietitians of Manitoba | 438 | | 3 | 41 | 6 | | 1 |
| College of Licensed Practical Nurses of Manitoba | 3,194 | 10 | 2 | 797 | 625 | | 67 |
| College of Medical Laboratory Technologists of Manitoba | 1,174 | 2 | | 236 | 50 | 6 | 36 |

| Regulatory Body | Registered members 2014 | Staff 2014 | | | Applica 2011-2 | | |
|---|-------------------------------|---------------|----|---------------------|--|---|---------------------------------|
| | | FT | PT | Total Applicants | Total Internationally Educated Applicants | Total provisionally licensed IEAs | Total fully licensed IEAs |
| College of Midwives of Manitoba | 68 | 1 | 2 | 90 | 75 | 5 | 4 |
| College of Occupational Therapists of Manitoba | 700 | 1 | 2 | 136 | 9 | | 4 |
| College of Pharmacists of Manitoba | 1,631 | 8 | | 466 | 206 | | 165 |
| College of Physicians and Surgeons of Manitoba | 3,849 | 27 | 5 | 1,032 | 580 | 52 | 52 |
| College of Physiotherapists of Manitoba | 933 | 4 | 1 | 149 | 10 | | 4 |
| College of Podiatrists of Manitoba | 32 | 1 | 1 | | | | 2 |
| College of Registered Nurses of Manitoba | 13,613 | 30 | | 2,216 | 480 | | 109 |
| College of Registered Psychiatric Nurses of Manitoba | 983 | 3 | 1 | 194 | 62 | | 1 |
| Denturist Association of Manitoba | 54 | | 1 | 5 | | | 2 |
| Institute of Chartered Accountants of Manitoba | 3,006 | 8 | 2 | 1,322 | 66 | 34 | 20 |
| Law Society of Manitoba | 4,254 | 31 | 10 | 414 | 92 | 36 | 33 |

| Regulatory Body | Registered members 2014 | St. 20 | | Applications 2011-2014 | | | |
|---|-------------------------------|-----------|----|---------------------------|--|---|---------------------------------|
| | | FT | PT | Total Applicants | Total Internationally Educated Applicants | Total provisionally licensed IEAs | Total fully licensed IEAs |
| Manitoba Association of Architects | 475 | 2 | | 85 | 26 | 5 | 21 |
| Manitoba Association of Optometrists | 152 | 3 | | 28 | 12 | | 9 |
| Manitoba Association of Registered Respiratory Therapists | 314 | | 2 | 56 | | | 1 |
| Manitoba Chiropractors Association | 285 | 2 | 3 | 29 | 25 | | 25 |
| Manitoba Dental Association | 1,959 | 6 | 2 | 75 | 15 | | 14 |
| Manitoba Institute of Agrologists | 658 | 2 | 1 | 213 | 78 | 18 | 17 |
| Manitoba Naturopathic Association | 26 | | 1 | | | | 0 |
| Manitoba Veterinary Medical Association | 384 | 3 | 2 | 49 | 18 | 9 | 5 |
| Opticians of Manitoba | 284 | 1 | 1 | 35 | 6 | | 3 |
| Psychological Association of Manitoba | 312 | | 2 | 34 | 9 | | 5 |
| Society of Management Accountants of Manitoba | 1,813 | 10 | | 1,166 | 465 | | 8 |

Source: Manitoba Regulator aggregate data 2011-2014- small volume applicant data not shown

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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