

2023 Registration Review Report

College of Audiologists and Speech-Language Pathologists of Manitoba



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Introduction

The Fair Registration Practices Office (FRPO) issues this registration review report for the College of Audiologists and Speech-Language Pathologists of Manitoba (CASLPM) under authority of The Fair Registration Practices in Regulated Professions Act (act).

Registration reviews are conducted at times specified by the director of fair registration practices and in accordance with the review provisions in the act, section 15.1, 15.2, and 15.3. The purpose of this review is to determine compliance with the legislation and to identify areas that may need improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the director.

Manitoba's fairness legislation was amended in December 2021. This review is largely restricted to the consideration of compliance regarding three new duties in the Fair Registration Practices Code: a duty that assessment criteria be necessary, a duty to abide domestic trade agreements and a duty to notify FRPO regarding changes in assessment and registration practice. Outstanding issues raised in previous registration review reports may also be raised or result in further recommendation for action.

This registration review results in an FRPO statement of compliance for the regulator. Reviews that result in recommendations to change practice or policy contain an action plan response from the regulator, current as of June 2023.

To provide context, a brief description of CASLPM's state of progress under fairness legislation to date precedes the compliance analysis. The report also includes appendices containing a flowchart of the registration process for internationally educated applicants, as well as registration data. Data is the latest information available at the time of review completion.

State of Progress

Since the introduction of Manitoba's fairness legislation in 2009, CASLPM has and continues to work co-operatively with FRPO and is committed to the fair assessment and registration of internationally educated audiologists and speech-language pathologists.

In 2016, the Canadian Alliance of Audiology and Speech-Language Pathology Regulators (CAASPR), with support and involvement of provincial regulators launched a Centralization and Capacity Building Project aimed at centralising certain functions related to the assessment of IEAs under a single body with the goal of better standardising outcomes. Starting in 2020, IEAs first step in the registration process with CASLPM is to apply to CAASPR for their initial assessment. Also, CASLPM now recommends all eligible applicants complete an entry-to-practice exam delivered by Speech-Language & Audiology Canada (SAC) before they register in Manitoba.

In response to the last registration review, CASLPM has worked to ensure applicants have access to information that is clear, complete, accurate and easy to find, updating their website and application documents. They also adopted a progressive criminal record check policy.

CASLPM has a well developed mentorship program and calls on members to provide supports to Provisionally Regulated Registrants. Mentorship arrangements with observation, feedback and targeted learning activities are also a means of allowing applicants to address small gaps. Historically, CASLPM has considered distance education courses, extended mentorship periods and additional mentorship activities among other approaches to address gaps while applicants are provisionally registered. This is also a progressive practice.

Fair Practice Analysis

I. Assessment criteria must be necessary – act, 8(4)

The criteria used in an assessment of qualifications must be necessary to assess competence in the practice of the profession.

With regard to substantive assessment criteria in a profession, for instance, the type and level of academic training required or the level of scrutiny brought to assess qualifications, FRPO recognises the authority of self-regulated professions setting these standards and will only question these requirements in the circumstance they are patently unreasonable. FRPO's evaluation focuses on the ways in which criteria and requirements may be unnecessary, unduly burdensome, or potentially result in forms of systemic discrimination, particularly as they may impact internationally educated applicants (IEAs).

CASLPM's compliance to necessary assessment criteria

1. CAASPR Language Proficiency Standard used by CASLPM indicates that cut scores are **'informed by language benchmarking work for the professions completed by the Canadian Centre for Language Benchmarks (CCLB) and mapped to Canadian Language Benchmark (CLB) of 9 in all domains of language use (Speaking, Listening, Reading and Writing)'**.

With regards to English language proficiency tests, requirements are for IELTS speaking 7.5, listening 8.0, reading 7.5 and writing 7.5. TOEFL is also accepted and TEF is one of the options for demonstrating proficiency in French.

The Government of Canada has developed language test equivalency charts for comparing CLB levels to IELTS and TEF but they do not have a chart for TOEFL. These charts indicate that TEF levels required by CAASPR are equivalent to CLB 9 but that levels required for IELTS are higher by .5 for the skill areas of reading, writing and speaking.

FRPO notes that CASLPM's language proficiency requirements are the highest among Manitoba professions. It is unclear why English language cut score requirements, demonstrated with an IELTS result, are higher than identified by the benchmarking work completed by CCLB and their equivalent requirement in French.

2. Since 2020, the first step in the registration process is to apply to CAASPR. CAASPR conducts initial academic assessments on behalf of CASLPM and several other Canadian regulators of audiology and speech-language pathology. International education programs are assessed against an academic equivalency framework that outlines required professional knowledge and competencies. This framework outlines that basic knowledge — theory-based courses — can be acquired through a Bachelor level degree but professional competencies — knowledge, skills and behaviors — must be acquired through a master's degree.

FRPO's concern is the fair consideration of those who apply with Bachelor level degrees, but who may have these competencies, acquired through their degree and/or work experience.

Educational standards for professional registration in other health professions — e.g., physiotherapy, occupational therapy — are similar in that a master's degree is required of a graduate of a Canadian program. However, differences in professional educational requirements outside of Canada are recognised; an IEA is not required to have a master's degree — only an entry-level professional degree found to be substantially equivalent. Pharmacy also moved to a Pharm-D requirement for graduates of Canadian programs but IEAs can apply with a bachelor's degree.

BC and Alberta consider qualifications evident in an internationally earned bachelor degree in audiology or speech-language pathology, providing a route to licensure in these provinces for IEAs as well as in Manitoba and other Canadian provinces through labour mobility.

It is unclear why competencies acquired through a professional undergraduate program and professional work experience are not considered in Manitoba. On the face of it, the master's level requirement CASLPM uses for IEAs appears unfair.

FRPO recognises the challenge assessing applicants may pose for a small profession such as CASLPM. FRPO is also uncertain of the level of demand for such an assessment. However, referring applicants to other jurisdictions with methods to consider IEAs who do not meet the master's level degree requirement may be a feasible option.

II. [Duty to comply with domestic trade agreements – act, 4\(1\)](#)

A regulated profession must ensure that its registration practices comply with the obligations of a domestic trade agreement.

The Manitoba government has labour mobility obligations that extend to regulated occupations, under both Chapter 7: Labour Mobility of the Canadian Free Trade Agreement (CFTA) and Article 13: Labour Mobility of the New West Partnership Trade Agreement (NWPTA). In Manitoba, regulated professions are required to comply with labour mobility obligations under The Fair Registration Practices in Regulated Professions Act, section 4(1), The Labour Mobility Act, section 3(1) and for health professions, under The Regulated Health Professions Act, section 32(3).

In the regulated occupations, the purpose of these obligations is to provide labour mobility through license-to-license recognition. This needs to occur without any material requirements for training, experience, examinations or assessments — CFTA, Article 705, paragraph 1, NWPTA, Article 13, paragraphs 1 and 2.

CASLPM's compliance to abide labour mobility obligations

CASLPM's labour mobility policies for individuals registered in other provincial jurisdictions applying for registration in Manitoba do not fully comply with provisions set out in the Canadian Free Trade Agreement and the New West Partnership Trade Agreement.

FRPO identifies the following concern:

CASLPM requires all applicants registered in other Canadian jurisdictions to have practiced 750 hours within the three years immediately preceding their application date.

This practice hour requirement is material and not permitted under CFTA or NWPTA. If the applicant is considered current by the provincial regulator in their home jurisdiction at time of application to CASLPM, they must be considered qualified in this respect in Manitoba.

III. Notice of changes in registration practices – act, 5(2)

A regulated profession that proposes to change its registration practices, as described in the information provided under clause (1)(a), must notify the director of the proposed change, at the time and in the manner and form required by the director.

The purpose of notification is to ensure FRPO has accurate, up-to-date information about the registration practices of Manitoba regulators. This supports FRPO's oversight role and allows for proactive discussion about the fairness of proposed changes.

CASLPM's compliance to the duty to notify

In preparation for this registration review, FRPO requested updates regarding changes to assessment and registration practice. CASLPM responded to this request and is in compliance with the duty to notify.

Recommendations

The Fair Registration Practices Office sees the following opportunities for the College of Audiologists and Speech-Language Pathologists to improve compliance to The Fair Registration Practices in Regulated Profession Act:

1. Ensure fair consideration for IEAs with bachelor level degrees in audiology and speech-language pathology.
2. Revise the IELTS language proficiency cut score requirement to be in line with the outcomes of the national benchmarking exercise and to match the French language score requirement.
3. Remove the practice hour requirement for labour mobility applicants.

Regulator Action Plan

In response to the recommendation made by the Fair Registration Practices Office, the College of Audiologists and Speech-Language Pathologists of Manitoba committed to the following action plan, current as of June 2023:

Recommendation	Action(s)	Anticipated Completion Date
<p>1. Ensure fair consideration for IEAs with bachelor level degrees in audiology and speech-language pathology.</p>	<p>Step 1: Meet with CASLPM Council to review FRPO recommendations — June and September 2023.</p> <p>Step 2: Review CAASPR international assessment process in light of software issues and lack of provincial representation in CAASPR. Currently, Manitoba and Newfoundland and Labrador remain.</p> <p>Step 3: Revise internationally educated credential review process to bring in-house to CASLPM — December 2023.</p> <p>Step 4: Create Board of Assessors from among CALSPM registrants, creating a secondary credentialing level for cases that do not meet current master’s level equivalency or who have major gaps in either education or clinical hours. — Spring 2024.</p> <p>Step 5: Hire and train assessors for the review of educational requirements — Spring/Summer 2024.</p> <p>Step 6: Conduct a comprehensive review of applicants over 2023 and 2024 to determine where changes can be made in the requirements for international education equivalency.</p>	<p>End 2024</p>

Recommendation	Action(s)	Anticipated Completion Date
<p>2. Revise the IELTS language proficiency cut score requirement to be in line with the outcomes of the national benchmarking exercise and to match the French language score requirement.</p>	<p>Step 1: Meet with other provinces to determine appropriate cut scores across Canada — ongoing starting in July 2023.</p> <p>Step 2: Consult with CASLPM Council to modify internal policy and process for changing the cut score — projected for early 2024.</p> <p>Step 3: Modify IELTS score to harmonise with Canadian regulators — where possible and to adjust scores as needed.</p>	<p>End 2024</p>
<p>3. Remove the practice hour requirement for labour mobility applicants.</p>	<p>Practice hours are no longer a requirement for labour mobility applicants.</p> <p>Changes to checklists, the CASLPM website, and guiding documents are to be made by September 2023.</p>	<p>September 2023</p>

Comments

CASLPM remains committed to ensuring fair practices for all registrants and regularly reviews application and registration requirements for compliance with relevant legislation, including The Regional Health Professions Act, the General Regulations, and the FRPO Legislation.

Recommendation 1:

Conversations around international application processes are underway at the CASLPM Council level.

Across Canada, a master's degree — or equivalent — is accepted by regulators. The assessments are made by third-party organizations — typically, World Education Services (WES) or other generally accepted organizations. WES provides instructional information on the equivalency of international bachelor's degree programs with the Canadian master's degree.

In making determination on the credentials required, there must be agreement from the other regulatory bodies across Canada and an agreement of CASLPM Council, on how to proceed with equivalency requirements, and where an equivalent bachelor's degree program with work experience may be acceptable.

CASLPM is committed to reviewing its international application and registration processes to ensure fairness for all applicants. Protection of the public, while ensuring the number of SLPs and AUDs in Manitoba remain consistent and a high standard of care if maintained are important factors for consideration.

Recommendation 2:

The IELTS cut score requirements are being discussed by provincial regulators to ensure consistency of requirements across Canada should the agreed-to CAASPR recommendations require modification. The expectation is that regulators will agree to recommendations for Pan-Canadian guidance on language requirements.

CASLPM recognises the need to work towards harmonization of the scores between IELTS and TEF as identified by the benchmarking work completed by the Centre for Canadian Language Benchmarks (CCLB).

Compliance

FRPO's 2023 registration review of the College of Audiologists and Speech-Language Pathologists of Manitoba (CASLPM) examines their compliance to three duties in the Fair Registration Practices Code of the act; assessment criteria are necessary, labour mobility obligations are respected and FRPO is notified regarding changes in assessment and registration practice.

FRPO finds CASLPM compliant with the duty to notify FRPO regarding changes in assessment in registration practices.

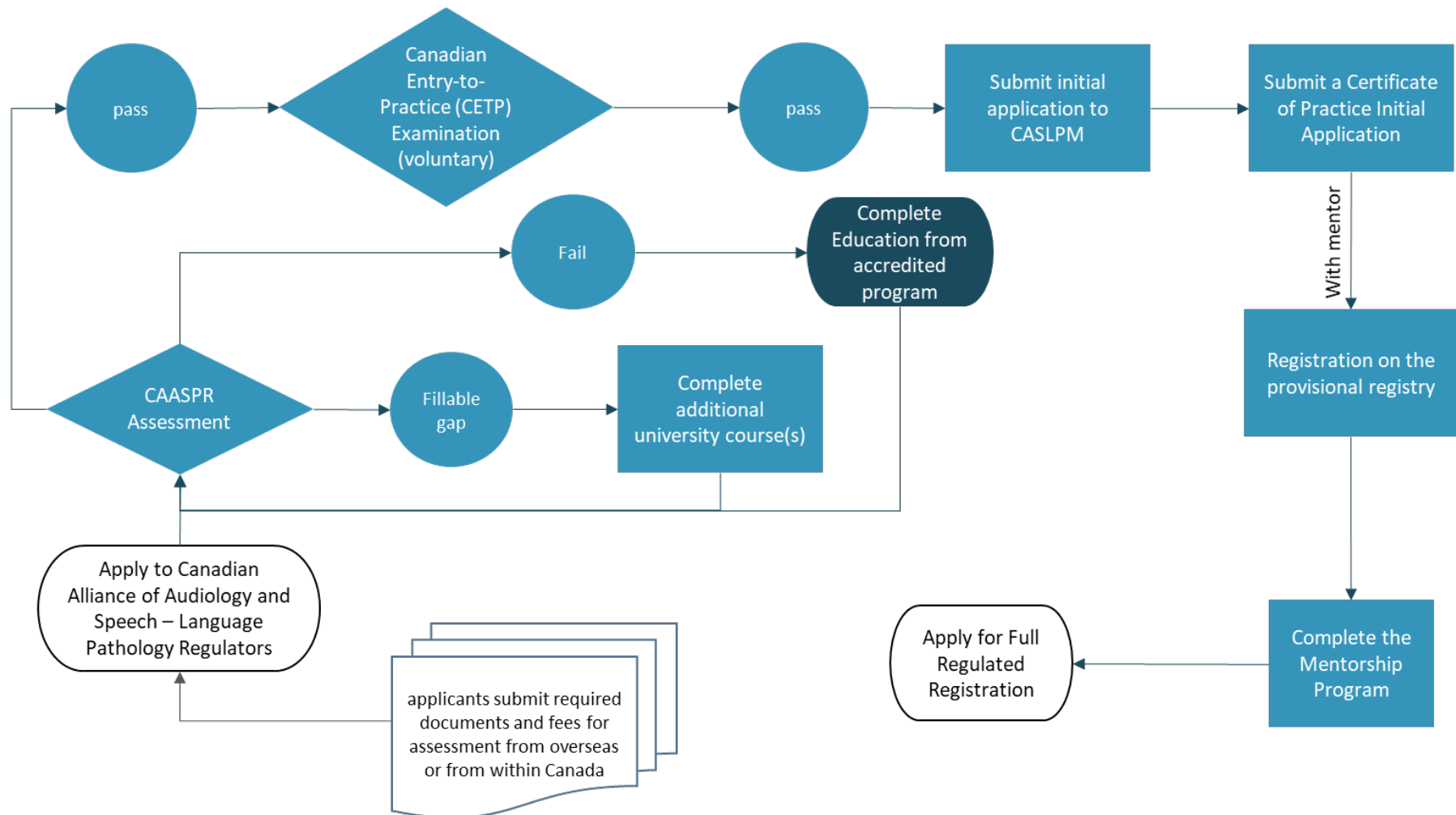
In this review, FRPO raises a concern about the need to give fair consideration to internationally educated applicants with bachelor level degrees in audiology or speech-language pathology. A concern is also raised about CASLPM's IELTS cut score requirement being both higher than recommended by their national benchmarking project and higher than what is required for applicants meeting requirements in French. Finally, FRPO expresses concern related to a practice hour requirement for mobility applicants. Although in practice, practice hours are no longer required, to be compliant with mobility legislation there is a need to update information and application materials to ensure requirements are clearly and accurately communicated.

CASLPM's commitments are a strong and positive response to FRPO recommendations. FRPO recognises that the recommendation to give fair consideration to applicants with bachelor level education will require significant internal capacity development and possible new approaches to allowing applicants to demonstrate competencies/address gaps. As a small organization, CASLPM's commitment to take this on is admirable.

FRPO acknowledges the importance of harmonising professional standards across the country and recognises that changes to language proficiency requirements will involve work on a national level. FRPO is confident the end result will be changes that will better ensure fair practice and compliance to The Fair Registration Practices in Regulated Professions Act.

Finally, updating information and application materials for mobility applicants in a timely manner supports applicant understanding of registration requirements and brings CASLPM into compliance to mobility legislation.

Appendix 1 – Registration Process for Internationally Educated Applicants



College of Audiologists
and Speech-Language
Pathologists of Manitoba



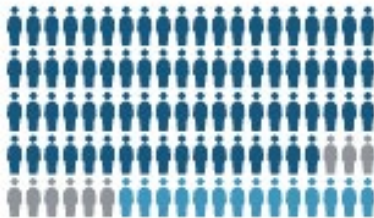
523
Registered
Members
(As of December 2022)

2011-2022 Internationally Educated Applicant Data



129
applications

Application Outcomes



registered - 77% | in process - 9% | file closed - 14%

Closed File Status



72%
withdrawn



28%
not approved



Top Countries of Education



applicants were educated in **10**
different countries



Median Time to Registration

1.3 years

2012-2022 Domestic Applicant Data



114
applications

59 (52%)
registrations