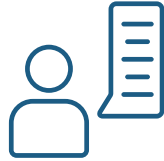


The Duty to Collaborate

A report on collaboration among Manitoba professions on remedial opportunities and supports for internationally educated applicants

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Introduction

From fall 2023 to winter 2024, the Fair Registration Practices Office (FRPO) engaged Manitoba regulated professions under fairness legislation in a review regarding their duty to collaborate with educators and employers on programs and strategies to support registration of internationally educated applicants (IEAs).

This report presents and summarizes the results of this registration review. It describes the nature of IEA qualification gaps and remediation needs reported by Manitoba regulated professions, the types of assistance strategies available, the challenges to collaboration, and the various commitments to progress made during the review by professions.

FRPO finds all Manitoba regulated professions demonstrate some measure of compliance to the duty to collaborate. Remedial opportunities for IEAs vary markedly across professions. For regulators, collaboration is impacted by numerous contextual and practical considerations: the extent and character of IEA remediation and assistance needs; the availability of resources and educational opportunities; and the willingness or ability of stakeholders to engage.

IEA remediation opportunities and support strategies remain a work in progress critical to IEA registration outcomes and timelines. Moving forward, approaches that allow IEAs the ability to address gaps while they are working in the field hold promise. Restricted scope-of-practice registration is another promising, alternative strategy allowing IEAs well-qualified in some areas of Canadian practice to be recognized, licensed and work with restriction.



Amended Fairness Legislation

In December 2021, the Manitoba government amended The Fair Registration Practices in Regulated Professions Act, introducing a specific duty in the Fair Registration Practice Code for Manitoba professions to collaborate with educators and employers to support successful registration outcomes for IEAs.

Regulated professions to collaborate in program development

8.1(1) A regulated profession must take reasonable steps to collaborate with education providers and employers to

(a) identify opportunities to develop programs that may assist internationally educated individuals and unsuccessful applicants in obtaining registration in the regulated profession; and

(b) develop programs identified in clause (a).

The purpose of the duty to collaborate is to maximize success rates and timely outcomes for IEAs. Internationally educated professionals may be qualified and experienced abroad but lack some aspect of qualification and experience relative to Canadian standards. For many in this group, successful registration depends on opportunities to address gaps. This may include measures like bridge training programs at educational institutions, access to university courses, supervised practice opportunities, internships and learning plans with employers. Without adequate opportunities, professions may see poor registration rates with only a select group of perfect-fit applicants having a timely route to registration.

The duty to collaborate directs professions to take 'reasonable steps' with educators and employers developing programs that assist applicants to become registered. What defines a reasonable step varies by the context and circumstance of the profession. The number of IEAs and the nature and extent of their qualification gaps largely determines how pressing the duty to collaborate is for a profession. Manitoba regulated professions work with limited resources to engage employers and educators. There may be a significant collaboration, a high degree of compliance to the duty by the regulator, but given the character of support or remediation achieved, still only limited IEA opportunities and a need to continue to evolve supports.

For more information about the duty to collaborate, please see FRPO's Duty to Collaborate Policy.



The Landscape

Most Manitoba regulated professions see applications from IEAs with a range of qualification gaps, where remediation and/or supports are critical for better registration rates. A few do not see IEAs with any qualification gaps and some have little or no applications from IEAs.

IEAs requiring less remediation and support often possess academic training recognized as substantively equivalent to Canadian standards. This group typically faces fewer exams or assessments. In some cases, Manitoba regulated professions have mutual recognition agreements and accords established by their respective national bodies with other international regulating authorities. In other cases, certain jurisdictions are recognized without formal agreements. IEAs qualifying to register with little or no remediation needs are in the minority in most of the professions.

The extent and availability of academic remediation opportunities for IEAs is often impacted by the presence of professional education programs in Manitoba. Seventy-four per cent (23/31) of Manitoba regulated professions have education programs in the province. Professions without Manitoba-based education programs must engage out-of-province programs for IEA remediation opportunities. Manitoba professions have little influence on these programs, so collaboration may be more challenging, and programs may not allow entrance to out-of-province residents. In 20 per cent of the professions, remediation is only available online.

There are currently five dedicated bridging programs for IEAs in Manitoba. These programs typically require considerable financial commitment from government and can be challenging to sustain if need fluctuates. Some Manitoba bridging programs have little capacity compared to demand and can only accommodate a fraction of the IEAs seeking remediation. In two Manitoba professions, out-of-province bridging is the only path to remediate gaps.

Fifty-two per cent (16/31) of Manitoba regulated professions rely on national bodies for initial assessment of IEAs and exam administration. In some of these professions, IEAs are required to show evidence of competence by passing a series of examinations. When IEAs are not successful on an exam(s), there may be little preparation support for another exam sitting; remediation is not assigned and often opportunities to remediate are not available.

Seventy-seven per cent (24/31) of Manitoba regulated professions allow qualified IEAs to work under supervision prior to registration. The nature and type of remediation and support available under supervision varies across professions. Depending on the character of public safety concerns in the occupation, professions may be limited in the ability to support formal remediation and assistance in the field. In some professions, significant vetting occurs before applicants can practice. In other professions, more support is offered with a larger range of gaps addressed under supervision.

The capacity and resource of Manitoba regulated professions to collaborate on IEA supports and remedial opportunities is impacted by their size. Manitoba's smallest profession has less than 25 members whereas the largest has over 14,000. Some have a regulatory staff of a few, part-time volunteer members while others have several dozen dedicated full-time employees. Annual registration fees provide regulators with their operation budgets.

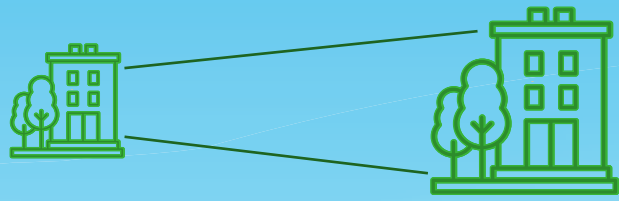
The annual number of IEAs also varies significantly by Manitoba profession – from zero applicants in some of the smaller professions in 2023, to more than 350 in other larger professions.

There are currently 10 professional education programs at Manitoba post-secondary institutions that allow IEAs to access courses on an as-needed basis to address academic remediation needs. In several professions where this isn't currently possible, Manitoba regulators are committed to advocating for these opportunities.

Restricted licensing is emerging in Manitoba regulated professions as an option for IEAs wishing to be assessed for and licensed with a narrower scope-of-practice. Two professions currently provide this opportunity, two are actively working towards offering this option and one is beginning to explore its feasibility.

Collaboration requires willing partners – educators, government, national third-party assessment bodies, employers, registered members – who also operate in resource-constrained environments.

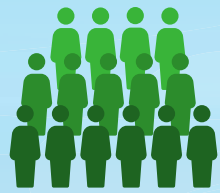
31 Regulated Professions



<25 members

>14,000 members

APPLICATIONS



some receive many IEAS



others receive very few or none

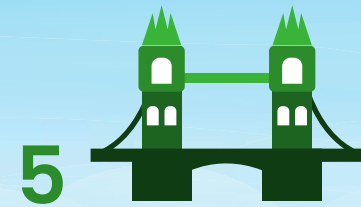
SOME professions

assess for gaps using competency-based or prior learning assessment and academic credentials. If gaps are found, remediation may be assigned

In **other professions**, applicants must demonstrate skills and knowledge by passing exams - remediation is not assigned

THE LANDSCAPE

COLLABORATION with Post-Secondary Institutions



5 DEDICATED bridging programs in Manitoba

These programs include practical training, typically in collaboration with employers

8 Professions without educational programs in Manitoba



In **6** professions

academic remediation must be done online



Professional programs at Manitoba **post-secondary institutions** allow IEAs to complete coursework needed to remediate



In **4** professions, bridging programs are only available out-of-province



24 regulators allow qualified applicants to work under supervision prior to registration



3 professions are exploring restricted license opportunities



2 professions have restricted license opportunities



Gaps

Gaps vary by profession and by applicant.

They mainly relate to:

- education (depth, focus, clinical training)
- scope-of-practice
- knowledge of Canadian professional practice requirements



15 professions

assess applicants themselves with some help from third parties



19%

of professions do not see IEAs with gaps or they receive few or no IEAs



In **16** professions

applicants are first assessed by third-party national bodies



81%

of professions report receiving IEAs with qualification gaps

COLLABORATION with Employers

Employers and licensed professionals work with IEAs in many professions as internship preceptors, supervisors and mentors.

In some professions they are also responsible for competency-based assessments, evaluations, and to participate in practical examinations.



Review Process

FRPO conducts registration reviews under authority of The Fair Registration Practices in Regulated Professions Act. Reviews are conducted at times specified by the director of fair registration practices and in accordance with the review provisions in the legislation, section 15.1, 15.2, and 15.3. The purpose of review is to determine compliance with the legislation, to identify areas that may need improvement and to secure commitments to action by Manitoba regulated professions.

This registration review required regulators to engage a self-assessment regarding the duty to collaborate. Regulators described the nature and extent of IEA qualification gaps, documented current remedial opportunities and support strategies with post-secondary institutions and employers, identified challenges and considered opportunities for progress. FRPO's self-assessment strategy supported an open communication process, better suited to consider the context-specific issue of collaboration, than a more conventional, auditor-style approach with well-defined compliance criteria.

FRPO objectives for this review were to:

- ensure Manitoba regulators fully understand their duty to collaborate
- acquire a good understanding of IEA qualification gaps, remedial opportunities, and other strategies that support successful registration of IEAs across professions
- explore opportunities for collaboration and secure commitments to improve compliance among Manitoba regulated professions

FRPO's review process involved Manitoba regulated professions:

1. participating in a group registration review meeting where FRPO reviewed what is involved in the duty, provided details of the review process, and presented FRPO's self-assessment tool
2. completing a self-assessment documenting IEA remediation and support needs, current approaches to collaboration and where appropriate, identifying opportunities for progress
3. meeting with FRPO to discuss and finalize their self-assessment and action plan commitments

Upon finalization of the self-assessment, FRPO issued a review statement to each Manitoba regulated profession summarizing findings, key challenges, action plan commitments and commenting on their compliance to the duty to collaborate.



group meeting



self-assessment



one : one meeting



review statement



Review Findings

This section provides a summary of findings from self-assessments completed by Manitoba regulated professions and detailed discussions at one-on-one review meetings. IEA qualification gaps, remedial and support opportunities, and challenges, as well as progress commitments and compliance findings are presented.

Remediation and Support Needs

Traditionally in the professions, key substantive qualification requirements involve academic training and a period of successful practice in the field. Regulatory assessments revolve around these two substantive requirements. For IEAs, providing evidence of qualification invariably involves an academic credential evaluation, and then, depending on the profession, completion of any or all of the following:

- a. academic remediation
- b. assessment of professional experience – either practical experience obtained in a formal education program or in the field post-graduation
- c. Canadian experience requirement
- d. regulatory exams and assessments

Assessment results serve as an indicator of qualification or a lack thereof. Often, they genuinely reflect gaps in qualification, but in some circumstances, they only indicate poor assessment performance.

FRPO distinguishes remediation needs from those of support or assistance. IEA qualification gaps resulting in **remediation needs** are those that are identified through some sort of assessment. This may occur with academic credential assessments, written exams, clinical/competency-based assessments, prior learning assessments or professional work experience assessments. Addressing qualification gaps assessed by the regulator is mandatory or necessary for registration. Some qualification gaps are not identified through assessment but rather presumed as common for IEAs. For instance, lack of experience working in a Canadian practice environment or knowledge of the professional and legal obligations of a licensed professional in Canada. These types of qualification gaps are addressed through **assistance or support**. This assistance may be optional or mandatory; for instance, exam preparation support may be voluntary, but a period of supervised practice before registration may be mandatory.

IEA Qualification Gaps

The majority of Manitoba regulated professions, 81 per cent (25/31), report receiving IEAs with qualification gaps. The extent and character of these qualification gaps vary by profession. A smaller group, 19% (6/31) either do not see IEAs with qualification gaps or have little or no experience with IEAs.

In most professions, there is a limit to the extent or range of academic qualification gaps that can be remediated. Bridge training programs are designed to address a specific range of gaps. Most professions require academic training that is substantially similar to Canadian standards. Without this type of training, applicants must re-do their education or pursue an alternate career.

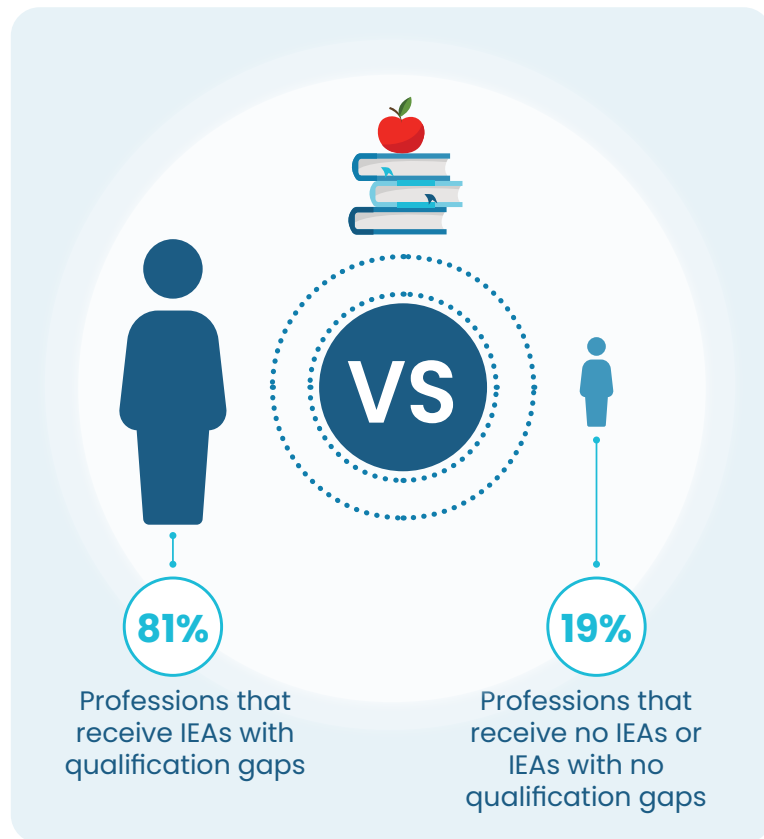
A range of qualification gaps

Most Manitoba regulated professions receive IEAs with a range of qualification gaps, from the well-qualified to those with significant gaps, too great to address.

IEAs well-qualified to enter practice in Manitoba tend to perform well on regulatory exams and assessments. Often, they come from jurisdictions with academic training recognized by Manitoba professions or where mutual reciprocity agreements have been established. Those with recognized academic training often require fewer exams or assessments.

In a few Manitoba professions, the Canadian model of training and practice is sufficiently distinct from other international jurisdictions that all IEAs will possess qualification gaps. In some cases, like the profession of midwifery, the scope-of-practice and professional training is different in Canada. In others, like the law profession, knowledge of Canadian law and court system is required.

The most common IEA qualification issue reported by Manitoba regulated professions is the need for exposure to the Canadian practice environment, including a better understanding of practitioner roles, local laws, regulatory jurisprudence, workplace culture and client



expectations. Qualification gaps tied to scope-of-practice issues and technical expertise were also identified and relate to differences in the training and practice of the profession abroad. In some professions, adequate English language proficiency was identified as a barrier and cause of registration delays. In the health professions, currency-of-practice was reported as one of the qualification issues.

Few or no qualification gaps; few or no IEAs

Nineteen per cent (6/31) of Manitoba regulated professions report receiving no IEAs with qualification gaps or simply few or no IEAs. In the professions not seeing IEA qualification gaps, registration rates are very high. This may be due to a straightforward education standard met in many international jurisdictions or because applicants are trained in a country with a similar education model. A few professions have not had any IEAs in the last several years. In these professions, IEA qualification gaps are not well understood.

The Manitoba Chiropractors Association is a good example of a profession that receives a significant number of IEAs annually, but without gaps in academic qualification. The IEA registration rate is nearly 100 per cent. Over the last decade, more than 90 per cent of applicants have been trained in recognized chiropractic programs in the United States. The chiropractic profession benefits from an internationally recognized education standard and accreditation process; there are several dozen recognized chiropractic training programs around the world. There is no academic program in Manitoba and only two in Canada. In Manitoba, no one has applied to the Manitoba Chiropractors Association without recognized training.

The naturopathy profession is an example of a profession with few applicants and no experience with IEA qualification gaps. Canada's model and scope-of-practice for naturopathy requires doctorate level training focused on science-based, Western medicine. There is no academic program in Manitoba and only two in Canada. There are seven recognized programs outside of Canada. To date, all IEAs qualified with recognized academic training. There have been a few inquiries from individuals with more traditional naturopathic training, but the qualification gap for this group is challenging, beyond what conventional remediation strategies can address. IEAs trained in a science-based naturopathy, but educated outside of recognized education programs may be referred to the College of Naturopaths of Ontario for assessment. Currently if gaps are identified, there are no formal academic remediation policies. FRPO understands that to date, no applicant has used this assessment.

Collaboration with Educators

Gaps in academic qualification are typically an assessed qualification gap that requires remediation.

Academic remediation opportunities require collaboration between regulating authorities and educational institutions and often involve other stakeholders such as governments and employers. Manitoba regulated professions may be directly involved working with local educators or indirectly through participation on committees with their respective national bodies responsible for assessing IEAs or accrediting Canadian academic programs. For regulators, collaboration with academic institutions provides IEAs opportunities to address gaps. This often involves training that supports professional orientation and successful workplace integration.

Remediation opportunities may take the form of access to select courses in university undergraduate and professional programs. They may involve dedicated bridging programs specifically designed to support the needs of IEA applicants in a profession. Degree completion programs allow IEAs to re-do the last couple of years of a professional degree at a Canadian university to qualify for licensure. Co-op work placements or clinical practicums may be components of this programming. Online courses delivered by out-of-province education institutions are increasingly becoming an option for remediation, particularly when there is no academic program in Manitoba or there is no capacity to remediate IEAs within a program here.

Across Manitoba regulated professions, IEA access to academic remediation opportunities varies. In 71 per cent (22/31) of professions there is some form of academic remediation opportunity for IEAs.

In Manitoba, physicians, registered nurses and licensed practical nurses benefit from local, dedicated bridge training for IEAs; dentists benefit from a degree completion program. For IEA physicians and dentists, these programs are highly competitive, must be completed in their entirety and are open to IEAs seeking registration in other provinces across the country. The Nurse Re-Entry Program at Red River College Polytechnic and the Practical Nurse Qualification Program, offered through Assiniboine Community College, may be completed in whole or in part depending on the regulator's assessment. Currently, these programs do not have capacity issues. The College of Medical Laboratory Technologists of Manitoba is awaiting news of a start date for their profession's recently resurrected gap training program.



BEST PRACTICE

The College of Registered Psychiatric Nurses of Manitoba collaborates with out-of-province education providers for the remediation of IEAs. Applicants can complete a combination of online coursework (even before arriving in Canada) and in-province clinical placements. The College has helped build relationships between the Manitoba Provincial Nominee Program, Manitoba nursing employers and these education providers, ensuring IEAs have a means of addressing gaps and entering the profession in a timely way.

Several Manitoba regulated professions engage out-of-province bridging programs to support IEA remediation needs in Manitoba. Several have a history advocating for the importance of bridge training programs and IEA access to academic courses at both out-of-province and in-province post-secondary institutions.

For IEAs to be eligible to access professional programs and academic coursework, a regulatory assessment and referral is usually required (conducted by the Manitoba regulated profession or a national, third-party assessor). Because professional programs often have program-based entrance requirements, regulators must typically work with the education program or faculty to grant IEAs access to select courses. Permanent residency is often required.

Regulators such as the College of Dietitians of Manitoba and the Manitoba Association of Registered Respiratory Therapists continue to be vocal advocates for IEA access to courses and practicums available in professional education programs. Over the last decade, the College of Midwives of Manitoba has collaborated with several midwifery gap training programs both in and out of Manitoba and worked to pilot a Manitoba Gap Training and Assessment Program. They continue to advocate for the development of IEA remediation capacity for the University of Manitoba's recently implemented midwifery program.

Professions with dedicated IEA bridge training programs, particularly in the health professions, often involve completing a practicum or supervised clinical placement opportunity. Educators collaborate with employers to make this possible. Some Manitoba regulated professions have arrangements with out-of-province bridging programs allowing practicums to occur in Manitoba.



BEST PRACTICE

In accounting, law and architecture, IEAs benefit from access to academic coursework in a broad range of areas to meet the education requirement in these professions. The national Chartered Professional Accountant's Preparatory Education Program, the Royal Architectural Institute of Canada's Syllabus Program, and most Canadian law faculties provide IEAs in these professions access to academic courses deemed necessary by the Manitoba regulator or their respective national assessment bodies.



In 29 per cent (9/31) of Manitoba regulated professions, IEAs have no academic remedial opportunity. In all but one profession, this is not a concern. These professions either have few or no IEAs, IEAs without academic qualification gaps, or remediation strategies that do not require academic coursework.

In the case of the Manitoba Veterinary Medical Association (MVMA), IEAs are not required to complete academic remediation. Applicants from non-accredited programs complete a series of written and practical examinations designed to assess their knowledge and skills in relation to the full scope of Canadian veterinary practice. These exams can be challenging, particularly for IEAs who are mid-career and have become more specialised in their practice of the profession. Bridging or refresher programming does not currently exist in Canada for IEAs nor can they access courses within existing professional programs. These opportunities would likely benefit many IEAs from non-accredited programs. With only five veterinary medicine programs in Canada (one in French), and no in-province program, capacity to deliver academic remediation for IEAs is limited. However, work is currently underway in this profession on an alternative assessment pathway leading to restricted scope-of-practice licensing. This is expected to improve registration rates and timelines for IEAs from non-accredited programs preferring to be assessed and work within a narrower scope. This licensing option will also reduce the need for IEA remediation supports.

Collaboration with Employers

Supervised practice offers an effective and efficient way for IEAs to address gaps and supports successful registration outcomes for IEAs. Supervised practice opportunities may:

- allow IEAs timely entry into the profession with gainful employment
- ensure IEAs stay current and are not deskilled for lack of practice
- provide exposure and professional orientation to Canadian practice environments
- allow for remediation of some profession-specific skills gaps
- offer a uniquely relevant, on-the-job assessment opportunity, giving people an opportunity to learn, adapt and show what they can do

Twenty-four Manitoba regulated professions (77 per cent) have opportunities for IEAs to work under supervision, typically using some form of conditional registration. There are significant differences in how this works across professions.

Among this group of professions with supervised practice opportunities, 71 per cent use it as a means for IEAs to help address remediation needs or to support professional skills and knowledge assessment. In 29 per cent (7/24) of these professions, supervised practice is used in a somewhat limited way. Often this only supports professional orientation and exposure to Canadian practice. Sometimes it's used to address gaps in currency or to support language development. To qualify for supervised practice, IEAs often have met nearly all of the profession's assessment and registration requirements.



Supervised practice can be mandatory or voluntary. In pharmacy for example, IEAs complete a mandatory internship requirement, receive regular evaluations and are given feedback by preceptors. Remediation needs of each IEA are not identified prior to internship but passing the internship is a requirement for registration. The internship addresses general IEA needs as they relate to expectations of practicing pharmacy in Canada, but it also supports individual development of areas of need identified through intern evaluations.

In respiratory therapy, a period of supervised practice is required but further applicant evaluation is not completed. IEAs in this profession must address their remediation needs before they enter the workplace under supervision. In veterinary medicine, supervised practice for a period of up to two years is possible but not required. This can be done after completing mandatory written exams and before required clinical exams; remediation is not assigned but IEAs often make use of this opportunity to address skill gaps and to better prepare for clinical exams.

In most cases, when there is a dedicated gap training program it includes a collaboration between the education provider and the employer and allows for participants to complete practicums or clinical placements in the workplace with support from both the employer and the educator. These placements are part of the remediation needed to address regulator identified gaps. Registered nursing, licensed practical nursing, midwifery and medical laboratory technology are examples of professions with this approach. In registered psychiatric nursing, there isn't a dedicated gap training program, however, IEAs in need of remediation typically complete a similar supervised clinical placement once assigned online coursework has been completed.

Some professions support IEAs addressing specific gaps under supervision, outside of bridge/gap training programs. In occupational therapy, qualifying IEAs are allowed to address currency-of-practice and minor language proficiency issues. Audiologists and speech-language pathologists can address minor skills gaps in the field with mentors and learning plans. Physiotherapists working under supervision receive regular feedback from their supervisors and are expected to work to address identified issues. IEAs must complete 12 months of supervised practice with a minimum of 1,200 practice hours in this period.

Several non-health professions – architecture, accounting, agronomists, engineering technology, social work – allow IEAs timely entry into practice as they can work in their field, abiding title and practice restrictions, before and during their application and assessment process with the regulator.

BEST PRACTICE



The College of Pharmacists of Manitoba has a long-standing internship program designed to support the transition of new practitioners into Canadian professional practice. In addition to guidance provided by an extensive internship manual, the College will be introducing training for preceptors specific to working with internationally educated pharmacists and supporting their unique needs.

Architect interns must complete a minimum of 3,720 hours in various areas of professional experience. IEAs may be credited with experience gained outside Canada if their work was supervised by an architect authorised to practice in the jurisdiction, is relevant to practice in Canada and can be appropriately documented.

The chartered professional accountant's (CPA-Manitoba) Professional Experience Program has a 'work-as-you-learn' structure, requiring employment in the field to complete the program. CPA Manitoba provides IEAs counseling support and networking information and works with Manitoba employers to approve training positions and support experience verification.

The engineers and geoscientists recently introduced a competency-based assessment (CBA) approach that involves employers (licensed professionals or equivalent) in the validation and assessment of intern competencies in the workplace over time.

For agrologists, engineering technologists and technicians as well as social workers, local work experience hours can be recognized towards meeting experience requirements for licensure.

Registered nursing and licensing practical nursing now allow IEAs enrolled in bridging to practice in the field under supervision. In the case of registered nurses, IEAs can work as undergraduate nurse employees (UNEs), similar to what is available for third-year nursing students at Manitoba nursing programs. For IEAs undergoing gap training for the LPN designation, registration in the Supervised Practice IEN program is available.

In professions such as dentistry, dental hygiene, naturopathy, podiatry, paramedicine and optometry, there are currently no opportunities for an IEAs to enter practice under supervision prior to licensure.

BEST PRACTICE

In 2022, Engineers Geoscientists Manitoba adopted a new pan-Canadian competency-based assessment to assess experience. Applicants with engineering and geoscience degrees from accredited or recognized programs are invited to enroll as interns and allowed to practice under the supervision of registered professionals as they develop and demonstrate competence in the field. Previously, more emphasis was placed on confirming academic qualifications, resulting in applicants spending considerable time and expense returning to study or writing technical exams before they were eligible to become an intern.



Restricted Scope-of-Practice Opportunities

In this review, Manitoba regulators were asked whether they offer restricted scope-of-practice registration or other forms of conditional registration intended to allow IEAs with qualification gaps a permanent registration opportunity. Although this falls outside of the duty to collaborate on remedial opportunities, restricted scope-of-practice registration represents another way to address the issue of qualification gaps. While some IEAs have gaps relative to the profession's full scope-of-practice due to differences in training and practice abroad, they may still be well-qualified to practice in a restricted role. Like many mid-career Canadian professionals, many IEAs have become specialised, and are ill-positioned to be qualified across a full scope-of-practice.

While this licensing option lends itself well to some professions, it does not work in all. The College of Physicians and Surgeons and Engineers Geoscientists Manitoba reported having restricted scope licensing options, allowing IEAs to license without needing to demonstrate the full scope-of-practice of the profession and allowing them to work in their area of expertise.

The Manitoba Veterinary Medical Association and the College of Medical Laboratory Technologists of Manitoba are actively engaged in national projects aimed at developing restricted scope assessment processes and eventually, restricted scope licenses. The Manitoba Dental Association is beginning to explore whether a restricted scope license would work in dentistry.

Throughout this review, Manitoba regulators were encouraged to consider the feasibility of restricted scope licenses for IEAs. These licensing options represent a systemic change to traditional licensing approaches. They support improved timelines and outcomes for IEAs and more skilled practitioners for Manitoba.

Compliance

This registration review resulted in Manitoba regulated professions making numerous commitments to improve or work toward improving IEA remediation opportunities. All 31 Manitoba regulated professions made commitments, many of which reflected activities in process or already under consideration at the time of review. Progress commitments covered a wide range of collaborative activities promising an equally wide range of impacts, from the weakly beneficial to substantive, systemic change.

FRPO found all 31 Manitoba regulated professions exhibiting some measure of compliance to the duty to collaborate in The Fair Registration in Regulated Professions Act. No formal recommendations were issued.

The majority of regulated professions (71 per cent) collaborate to support academic remediation opportunities; 77 per cent collaborate to provide supports necessary for registration including supervised practice opportunities. In those professions where there is little or no collaboration for remedial opportunities and supports, the commitments in place are reasonable. To date, these regulators have not received IEAs with qualification gaps or have received few if any IEAs. In the circumstance that such an applicant applies they are committed to giving the applicant consideration and where feasible to collaborate with educators and/or employers to provide support.

Although Manitoba regulators show compliance with the duty in these ways, IEA remediation and support opportunities can be improved and remain works in progress. An overview of the progress commitments of Manitoba regulated professions is presented below. Please see the appendix to this report for a detailed list of these commitments by profession.

Summary of Regulator Commitments



Collaboration with Employers

- engage licensed practitioners in IEA gap assessment, skills evaluation and remediation determinations
- consider supervised practice as a means for IEAs to address qualification gaps
- introduce preceptor training specific to working with IEAs
- explore supervised practice, including formal student opportunities, as a means for IEAs to enter their fields sooner while addressing gaps through assigned programming
- develop mentorship opportunities



Collaboration with Educators

- advocate for IEA access to courses and practicums within MB post-secondary professional programs
- engage out-of-province education providers regarding remedial opportunities for IEAs - coordinate practicum components in MB
- advocate for IEAs to audit courses as preparation for licensing exams
- explore new online coursework options and advocate for increased online delivery of in-province programs
- advocate for IEA gap training /bridging program options



Collaboration with other Stakeholders

- work with national bodies to review and streamline assessment processes
- develop better orientation for IEAs
- advocate for funding for sustainable bridging programs
- establish opportunities for IEAs to be assessed by other provinces when not possible in Manitoba
- introduce legislative changes necessary to create student registers for IEAs
- engage in working groups tasked with improving supports for IEAs



New Approaches

- introduce permanent restricted license options
- recognize out-of-province gap training/bridging programs
- consider US-based online courses for gap remediation
- make better use of conditional registration options for near qualified applicants
- introduce streamlined, expedited registration pathways



Moving Forward

Across Canada, IEA assessment and registration pathways as well as remediation/support strategies are evolving rapidly. In large part this is being driven by practitioner shortages, a recognition of the potential resource IEAs represent and a newfound sense of urgency for provincial governments and regulators.

In Manitoba, IEA remediation and support opportunities of some sort are available in nearly all professions. Manitoba regulators are committed and engaged. Many of the measures being taken are directed to improving and streamlining current remedial opportunities. For example, the move to online education, coursework and orientation materials is improving accessibility of supports for IEAs. Other efforts involve systemic change, new ways of assessing, remediating and registering applicants.

In some cases what is available for IEAs in Manitoba is limited and continued work and evolution of supports is needed. In this context, IEA remediation opportunities, support approaches and licensure pathways remain a critical issue and an ongoing project among Manitoba regulated professions.

Recognizing the challenges associated with collaboration with stakeholders in a resource constrained environment, FRPO identifies two key, systemic change strategies moving forward:

- Expanding the use of supervised practice – greater regulator collaboration with employers for IEA assessment and/or remediation of skills gaps, while people work in the field, would give IEAs a chance to learn, adapt and fit in while completing the profession's registration process. Increased resources and supports may be needed for employers and supervisors to ensure success.
- Restricted scope-of-practice registration – this allows IEAs well-qualified in some areas of Canadian practice to be recognized, licensed and work with restriction. The value of this approach depends on the nature of Canadian practice and the fit of partially qualified IEAs to the needs in the workforce.

FRPO continues to engage Manitoba regulated professions evolving IEA remedial and support opportunities. This engagement is itself a work of collaboration. Progress requires a willingness and commitment by regulators and other stakeholders to explore and develop new remediation strategies, IEA-supportive approaches and registration pathways.



Appendix – Commitments by Manitoba Professions

Agrologists Manitoba

Continue to work with key stakeholders to re-introduce a formalized program to support gap remediation of internationally educated agrologists in Manitoba.

Association of Manitoba Land Surveyors

Continue to support the Canadian Board of Examiners for Professional Surveyors as it works towards more streamlined assessment and remediation processes for internationally educated applicants.

Certified Technicians and Technologists Association of Manitoba Inc.

Continue to work with employers allowing IEAs the opportunity to gain experience and show evidence of qualification required for registration.

Chartered Professional Accountants of Manitoba

Continue to collaborate with Manitoba Start and Economic Development Winnipeg to develop business and cultural preparation resources for IEAs as appropriate.

Continue collaboration with CPA Western School of Business, recognized post-secondary institutions, employers and provincial colleagues to better understand the gaps and enhance remedial opportunities.

College of Audiologists and Speech-Language Pathologists of Manitoba

Explore referral options for IEA assessment and remediation opportunities available outside of Manitoba.

Engage with members to assist with collaboration on education, remedial opportunities, and advice to applicants with gaps needing remediation.

College of Dietitians of Manitoba

Continue discussions and engagement with the University of Manitoba's Human Nutritional Sciences Program and Dietetic Practicum Program exploring IEA bridge training and practicum opportunities.

Appendix – Commitments by Manitoba Professions

College of Licensed Practical Nurses of Manitoba

Continue collaborating with stakeholders to inform the direction and future of the Practical Nurse Qualification Recognition (PNQR) program through the PNQR Working Group. This includes exploring the possibility of offering the PNQR remotely.

Continue to collaborate with Shared Health on the ongoing expansion of the SIEN program, including work evaluating the program.

Continue to review registration pathways and continue to work to innovate, streamline, and expedite whenever possible and appropriate.

College of Medical Laboratory Technologists of Manitoba

Continue to advocate for long-term sustainable funding for a Manitoba bridging program for internationally educated medical laboratory technologists (IEMLTs).

Continue to work with/support the Canadian Alliance of Medical Laboratory Professionals Regulators to explore flexible pathways to registration for IEMLTs and IEAs with non-traditional MLT education.

College of Midwives of Manitoba

Continue to work with the Canadian Midwifery Regulators Council to explore opportunities to develop a pan-Canadian orientation and assessment process for internationally educated midwives (IEMs).

Support the development of assessment and/or remediation opportunities for IEMs in cooperation with a Manitoba post-secondary institution including via the University of Manitoba, Bachelor of Midwifery Program.

Explore referral opportunities for IEM assessment and remediation opportunities available in other provinces.

College of Occupational Therapists of Manitoba

Continue to support and be actively involved in the initiatives of the Internationally Educated Health Professionals (IEHP) Access Hub at the University of Manitoba.

Work with the Association of Canadian Occupational Therapy Regulatory Organizations in developing supports for internationally educated occupational therapist success.

Appendix – Commitments by Manitoba Professions

College of Pharmacists of Manitoba

Continue to support and be actively involved in the initiatives of the IEHP Access Hub at the University of Manitoba.

CPhM has identified the need for improved preceptor training in its strategic plan and has researched preceptor training programs both in Manitoba and at other Canadian universities. They will be introducing preceptor training in Manitoba that will help support safe, competent pharmacy practice of new practitioners.

College of Physiotherapists of Manitoba

Continue to support and be actively involved in the initiatives of the IEHP Access Hub at the University of Manitoba.

Explore access to bridging programs for MB applicants including the potential for IEAs to complete aspects of bridging, such as clinical placements, in Manitoba.

Continue to plan physiotherapy profession stakeholder meetings between College of Rehabilitation Sciences – Physiotherapy, the Manitoba Physiotherapy Association and the College of Physiotherapists of Manitoba.

College of Podiatrists of Manitoba

Engage the Michener Institute in Ontario regarding access for Manitoba IEAs to training needed for the new prescribing authority for podiatrists.

College of Registered Nurses of Manitoba

Continue to engage with the provincial government, Red River College Polytechnic, and provincial health employers regarding the evolution and development of internationally educated nurse (IEN) remedial opportunities and expedited registration pathways.

Explore FRPO’s recommendations to:

- create remedial education opportunities through employers, allowing IENs the ability to be exposed to Canadian practice before clinical competence assessment and to address gaps under supervision.

Appendix – Commitments by Manitoba Professions

College of Registered Psychiatric Nurses of Manitoba

Work with the National Nurse Assessment Service (NNAS), continue to explore ways to streamline their assessment processes for internationally educated psychiatric nurse (IEPN) applicants.

Continue to collaborate with Manitoba stakeholders, including the College of Registered Nurses of Manitoba and the College of Licensed Practical Nurses of Manitoba to explore clinical competence/performance-based assessment opportunities. Learn more about RPN performance-based assessment tools used by the Nursing Community Assessment Service in British Columbia.

Continue participating on the IEN Integration Advisory Group, working with Manitoba stakeholders to improve the efficiency and effectiveness of IEN registration pathways.

Continue pursuing regulatory changes with the legislative unit of Manitoba Health to allow IEPN applicants to work as Undergraduate Nurse Employees (UNE) while completing remedial upgrading.

Continue to collaborate with key stakeholders including Manitoba nurse employers, bridging programs and the Manitoba Provincial Nominee Program to help ensure IEPNs are using the most appropriate immigration pathways to complete clinical placements.

Engineers Geoscientists Manitoba

Continue to work for the effective implementation of the Competency Based Assessment, supporting proper orientation/training for applicants, validators and assessors, and access to online education resources for IEAs.

Continue to engage with the Price Faculty of Engineering at the University of Manitoba regarding a new Post-Baccalaureate program with co-op placements open to participants including IEAs.

Manitoba Association of Optometrists

A policy that will allow conditional registration for IEAs who may not meet MAO's currency-of-practice requirement is under review.

Appendix – Commitments by Manitoba Professions

Manitoba College of Social Workers

Continue to explore the development of gap training opportunities for IEAs through the Inter-sectoral Committee, made up of representatives from Canadian Association of Social Workers (CASW), Canadian Association for Social Work Education and the Canadian Council of Social Work Regulators.

Continue to explore opportunities for IEAs to address CASW identified gaps (liberal arts courses and field work), with provincial social work educational institutions (University of Manitoba, Booth University College, Université de St. Boniface) and to complete training regarding the Canadian context of social work practice such as: working with Indigenous Peoples, equity, diversity, and inclusion.

Continue to consult on and provide input regarding University of Manitoba certificate programs as well as micro-credential and professional development programming.

Manitoba Veterinary Medical Association

Continue to develop a resource to support effective and supportive supervised practice arrangements by allowing Manitoba veterinary practices and IEAs to indicate their desire to either train or be trained in specific areas as they prepare for their exams.

Continue to support the Canadian Council of Veterinary Registrars with its restricted scope-of-practice project.

Continue to advocate for increased capacity for the Western College of Veterinary Medicine which would:

- Increase capacity for the Clinical Proficiency Exam
- Increase capacity for IEAs to engage in the PAVE program and/or clinical 4th year program - by accepting IEAs as fourth year students of veterinary medicine.

The College of Dental Hygienists of Manitoba

Further explore expanding the role of mentors to assist IEAs in the field.

Further engage the University of Manitoba, Extended Education, regarding the development of Restorative Refresher and Orthodontic Refresher courses for dental hygienists.

Appendix – Commitments by Manitoba Professions

The College of Paramedics of Manitoba

Work with IEAs on a case-by-case basis to find remediation solutions to identified gaps when possible.

Work with Manitoba educational institutions to ensure opportunities for course-based access exist for IEAs with remediable gaps.

Include gap assessment of processes regarding IEAs in strategic planning development.

The College of Physicians and Surgeons of Manitoba

Strike a new international medical graduate (IMG) working group to make recommendations regarding: an orientation program for registrants new to practice, registration issues specific to IMGs including policies, processes, and procedures that are in place for provisionally registered physicians, and IMG mentorship.

Continue to develop informational resources, including a formal orientation program for IMGs.

The Denturists Association

Work with IEAs on a case-by-case basis to find remediation solutions to identified gaps when possible.

The Law Society of Manitoba

Continue to support registration as law students for those IEAs going through the National Committee on Accreditation process and who reside in Manitoba. Support, consult and where appropriate collaborate with stakeholders involved in the following activities:

- CPLED is reviewing past Capstone results to identify areas where IEAs have struggled and is consulting with IEA focus groups to assist in making possible changes to PREP content, developing new supplementary courses or possibly creating new preparation courses for those students re-attempting the Capstone.
- The University of Manitoba's Faculty of Law is currently engaged in the development of a program that will be designed to address many of the hurdles that IEAs face when they arrive in Manitoba hoping to practise law. Key goals of the program will be to provide a clear pathway for IEAs to follow that reflects their diverse needs, to facilitate access to broader supports and resources for them within the University, to enhance connections among IEAs, the faculty, and the practising bar, and to improve access to and diversity within the legal profession in Manitoba.

Appendix – Commitments by Manitoba Professions

The Manitoba Association of Architects

Continue supporting and engaging the Canadian Architectural Certification Board regarding the piloting of preparation material for Broadly Experienced Foreign Architect candidates, as well as advocating for reasonable application fees.

The Manitoba Association of Registered Respiratory Therapists

Continue to support and be actively involved in the initiatives of the IEHP Access Hub at the University of Manitoba.

Continue to advocate for remediation opportunities for IEAs in Manitoba such as course-based access to the respiratory therapy program at the University of Manitoba.

Continue to engage in opportunities to support IEHPs through membership on the newly established International Interest/Working Group as part of Equal Council.

The Manitoba Chiropractors Association

Where appropriate and feasible, continue to consider conditional registration supporting near qualified IEAs toward full registration.

The Manitoba Dental Association

Review the feasibility of restricted licensing for internationally educated dentists.

Continue to work with/support key stakeholders to review gap assessment and certification processes for internationally educated dentists.

The Manitoba Naturopathic Association

Continue to collaborate with the College of Naturopathic Doctors of Ontario, allowing access to their prior learning assessment and recognition (PLAR) program and monitoring PLAR assessment outcomes and available remedial opportunities.

The Opticians of Manitoba

Explore the use of supervised practice as a means for IEAs to address certain skills gaps while continuing to work with the National Alliance of Canadian Optician Regulators to foster collaboration.

The Psychological Association of Manitoba

For IEAs with qualification gaps that could be addressed completing academic coursework through the University of Manitoba, approach the parties involved regarding access for these individuals to enroll in select coursework.



Fair Registration Practices Office
301-155 Carlton Street
Winnipeg MB R3C 3H8

E: frpo@gov.mb.ca
T: 204-945-7353
manitoba.ca/frpo