



OMFC REGISTRATION REVIEW

**College of Medical Laboratory Technologists of
Manitoba
Final Registration Review Report (2013)**

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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Introduction

This Final Registration Review Report presents the results of the Office of the Manitoba Fairness Commissioner's (OMFC) registration review with the College of Medical Laboratory Technologists of Manitoba (CMLTM) as of February 2013.

Registration reviews are conducted as part of the Fairness Commissioner's mandate to review the registration practices of regulatory bodies subject to *The Fair Registration Practices in Regulated Professions Act (Act)*.

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations to improve compliance. Compliance refers first and foremost to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants. It also refers to the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that a registration review for any given regulator is to be undertaken at times specified by the Fairness Commissioner. The content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

The OMFC's review process culminates in a Final Registration Review Report, complete with an Action Plan from the regulator. This report is a public document submitted to the Province's Minister of Immigration and Multiculturalism and posted on the OMFC's website.

Review Process

For the purposes of the 2012/13 registration review cycle, regulatory bodies with few internationally educated applicants and/or that rely heavily upon third parties for their assessment process participated in a self-assessment review process.

The review process had several steps: agreeing to a review schedule, arranging for the involvement of key staff and council members, participating in a two day self-assessment workshop, drafting an action plan and finalizing the plan in consultation with the Fairness Commissioner.

The process was designed to support meaningful reviews that concretely identify fairness issues and lead to progressive change.

The Fairness Standard and Self-Assessment Workshop

As a first review encounter with the OMFC, regulatory practice was evaluated against a single broad fairness standard as defined by the OMFC's *Fairness Standard and Criteria Document*:

Dedicated and fair practices are applied for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure their effectiveness.

This fairness standard covers the full spectrum of fair assessment and registration practice and is defined with multiple elements and criteria in the *Fairness Standard and Criteria Document*.

Over the course of a two-day self-assessment workshop, the standard was explained and regulators examined their practice in light of the various elements and criteria involved. Special emphasis was placed on the importance of clear, complete and accurate assessment and registration information, fair third party assessment practice and the consideration of qualifications acquired through professional work experience. Solutions and best practice models were presented as regulators drafted action plans to address issues of concern.

Action Plan & Compliance Statement

Shortly after the workshop, regulators submitted board-approved Action Plans to the OMFC. Regulators met with the Fairness Commissioner to discuss the plans and in some instances, revisions were made.

The Action Plan contained in this report has been reviewed by the Fairness Commissioner and is comprised of actions needed to address fairness concerns and improve compliance to *The Fair Registration Practices in Regulated Professions Act*.

Concluding this report, the Fairness Commissioner's Compliance Statement provides comment on the suitability of the regulator's Action Plan and the overall compliance of the regulator's registration practice.

Overview of the Assessment and Registration Process of the College of Medical Laboratory Technologists of Manitoba

The College of Medical Laboratory Technologists of Manitoba (CMLTM) regulates the profession in Manitoba under the authority of *The Medical Laboratory Technologists Act of 2002* (C.C.S.M. c. M100). Registration by the CMLTM grants the right to title. Only registered members can represent themselves as a ‘medical laboratory technologist’ or any of its variations.

Medical laboratory technologists perform procedures related to the diagnoses and treatment of disease. They commonly work in hospitals, health clinics, and research and health laboratories.

Provincial immigration statistics indicate that 70 internationally educated medical laboratory technologist immigrated to Manitoba from 2005 to 2011.

Qualifications

There are two principal qualifications required for registration as a medical laboratory technologist. Individuals must possess a medical laboratory technologist diploma from an educational program accredited by Conjoint Accreditation Services, Canadian Medical Association (CAS). Secondly, applicants must successfully write the Canadian Society for Medical Laboratory Technologist (National Body) National Certification Examinations.

Internationally educated applicants with CAS unaccredited academic qualifications must undergo the National Body’s Prior Learning Assessment to determine if their academic training and professional work experience provide substantively equivalent training to the Canadian standard.

Assessment and Registration Process

To initiate the registration process, applicants apply to the National Body. Graduates from CAS accredited academic programs directly apply to write the National Certification Exam.

Internationally educated applicants must first apply for a National Body PLAR assessment. Applicants complete an online ‘Personal Competency Rating Booklet and a “PLA Online Self-Assessment”, pay a \$1,000.00 application fee and supply the following documents:

- notarized copy of resident status
- notarized copy of professional certificate or license from the country in which you worked*
- if applicable proof of English or French language proficiency
- credential evaluation report from an approved credential assessment service*

- syllabus of studies or outlines and descriptions of course content studied*
- documentation of clinical education and apprenticeship training including official outline of scope and volume of testing performed*
- official transcripts and course outline for other relevant education*
- work experience letters from employers including detailed outline of responsibilities and tests performed*
- documentation of continuing education and professional development*

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

The National Body assesses the results of the online assessments as well as the applicant's education, training and work experience to determine equivalence to the Canadian standard as defined by the National Body's Competency Profile. There are three types of assessment results:

1. Applicant meets the requirements and is eligible to write the National Exam
2. Applicant meets the majority of requirements, but there are identified gaps. The National Body will advise applicants about remedial gap training opportunities.
3. In large measure, the applicant does not meet the requirements to be a Registered Medical Laboratory Technologist. Applicants receive information about complete retraining options.

Unsuccessful applicants are provided with a report outlining the areas in which they need to upgrade. This includes a learning plan outlining required courses and education institutions offering those courses. The CLMTM recognizes two bridging programs, those offered by Diagnostic Services of Manitoba in Winnipeg and the Michener Institute for Applied Health Sciences in Toronto.

Successful applicants and those who have completed any required remedial training are deemed eligible to write the National Certification Examination by the National Body.

National Exam Eligibility & Conditional Registration with the CLMTM

Upon being granted eligibility to write the National Certification Examination, applicants can apply to the CLMTM for conditional registration. Conditional registration allows individuals the ability to practise under supervision as an MLT while preparing to write the National Certification Examination and while waiting for the results of the exam. A CSMLS Conditional Certificate to Practice is valid for 14 months or 3 attempts at the CSMLS MLT certification examination, whichever comes first.

Applicants complete a CLMTM application form, pay a \$100.00 application fee and supply the following documents:

- original copy of the National Body prior learning assessment report
- letter of eligibility to write the Canadian Society for Medical Laboratory Science certification examination

- copies of relevant degrees and certificates
- copy of Canadian government-issued photo identification
- \$350.00 annual registration fee

National Certification Examination

The National Certification Examination is a 3 part, 2 hour per part, multiple choice exams. There is a general exam and two speciality exams in clinical genetics and diagnostic cytology. The full exam costs \$1,699.00 for applicants with conditional registration with the CLMTM and \$2,525.00 for unregistered applicants. These exams are offered three times per year (February, June, and October).

CMLTM Registration

Upon successfully completing the National Certification Exam, applicants apply to the CMLTM for full registration. For those applicants with conditional registration this simply involves providing verification from the National Body of completing the national exam. Those without conditional registration must supply the documents and fees identified above for conditional registration as well as this National Body documentation about the exam.

Appeal Process

CMLTM registration decisions that deny or apply conditions to registration can be appealed to the CMLTM Council. Appeals must be launched by the applicant within 30 days of receipt of the decision and are heard by the CMLTM Council within 90 days of receiving the notice of appeal. Appellants are entitled to appear before the council with counsel. A member of the board of assessors who is also a member of the council may participate in the hearing but cannot vote on a decision. Appeal decisions must be rendered within 90 days; unsatisfied appellants may take the matter to the Court of Queen's Bench.

Time and Cost

The time and cost to be registered will vary depending on the circumstances of the applicant. The CMLTM reports that upon completed application registration commonly will take from several months to over a year. There likely will be additional time required to secure the required documentation. Pass rates for the National Certification Exam are low and more than one writing may be required for all or parts of the exam. Directs costs for registration approximately total \$3200.00 to \$6500.00. There may be associated costs supplying documentation, translating documents, preparing for exam. There will be significant additional costs if remedial upgrading is required or if multiple exam attempts are needed.

Fees

Exam Type	Member	Non-Member	Non-Resident
General MLT	\$499	\$725	\$1,350
Clinical Genetics	\$600	\$900	\$1,800
Diagnostic Cytology	\$600	\$900	\$1,800

English or French language competency test \$160.00-\$320.00 (required if MLT was not trained in French or English).

CSMLS PLA \$1,000.00

First Time Application Fee \$100.00

Annual registration fee \$350.00 (First time applicants applying after June 1st in any year will pay \$175.)

College of Medical Laboratory Technologists of Manitoba's Action Plan

In response to the self-identified Compliance Issues, the College of Medical Laboratory Technologists of Manitoba proposed the following action plan as of February 2013. The plan is reprinted in its entirety under the 'CMLTM's Action Plan' column in the table below.

The CMLTM's Action Plan will form the basis of its relationship with the OMFC moving forward. The plan is monitored by the OMFC and will be tracked in the 'Completion Date' box of the Action Plan as it comes to fruition. As the report will be available online, this allows any interested party to see the progress to date.

Compliance Issues	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
Fees and fee payment options; <ul style="list-style-type: none"> Fees and costs need some clarification 	Add cost of credential evaluation to “Certification and Registration Process” with a note that the WES ICAP reduces the document duplication Add costs of GAP Training \$400-\$600 per course and that it is self-directed (done within course requirements)	✓ ✓			
Financial support opportunities <ul style="list-style-type: none"> No information on available funding and financial supports 	Add to the “Time and Cost” a link to any sites that OMFC provides re: financial support (i.e. SEED program)		✓		
A realistic sense of time range and how long the entire process takes <ul style="list-style-type: none"> Time expectations not as accurate as they could be 	Add to “Time and Cost” after “It can take...” add “On average, the entire process takes 18 months to 2 years to complete.”	✓			

Compliance Issues	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>Alternative documentation opportunities are avail and clearly explained</p> <ul style="list-style-type: none"> Nothing on the website regarding alternative documentation 	<p>Will be contacting the 3rd party assessor (CSMLS) and discuss what information would be allowed on our website (where needed, dealt on a case by case bases)</p>			✓	
<p>Criminal records policy is warranted and clearly explained</p> <ul style="list-style-type: none"> Criminal record policy not posted on website 	<p>Will post criminal record policy on CMLTM website</p>		✓		

Compliance Issues	Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>Applicants are informed of their access to records and the process for requesting records.</p> <ul style="list-style-type: none"> No policy dealing with access to records. 	<p>Create policy for "Access to Records" and post on website</p>		<p>✓</p>		

Fairness Commissioner's Statement of Compliance

The College of Medical Laboratory Technologists of Manitoba Action Plan is a constructive response to the registration review. The College's proposed actions will support fairer practice and improve their compliance to *The Fair Registration Practices in Regulated Professions Act*.

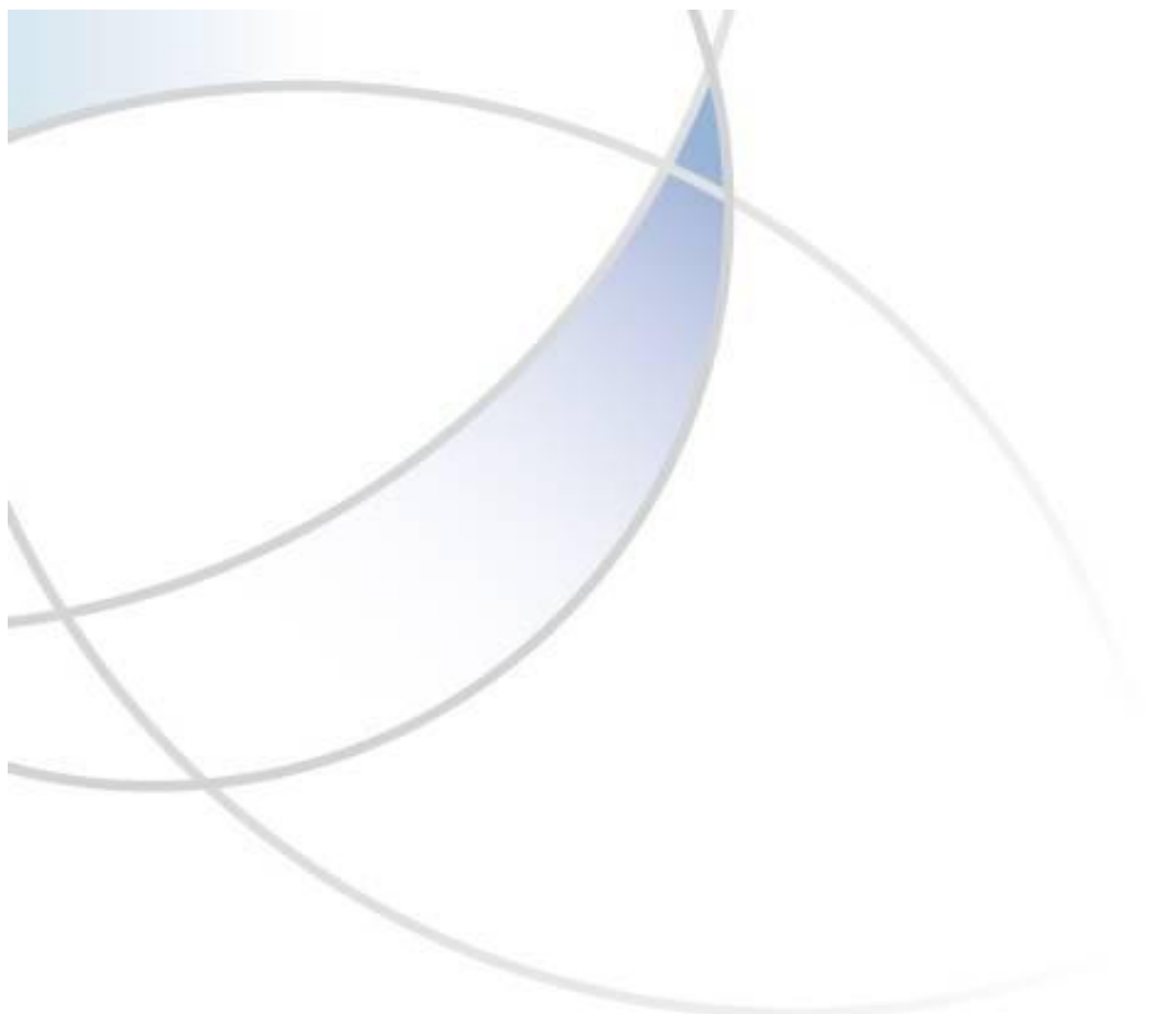
The College is a progressive regulator backed by a strong national organization committed to the fair assessment and recognition of internationally educated applicants.

We appreciated the positive, productive participation of the College's staff and board members at the OMFC review workshop. We have also appreciated the College's history of active engagement with the OMFC and look forward to our work together moving forward.



Ximena Munoz

Manitoba Fairness Commissioner



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