



# **2017 Registration Review Report College of Audiologists and Speech-Language Pathologists of Manitoba**

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER



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## Executive Summary

The 2017 Registration Review Report for the College of Audiologists and Speech-Language Pathologists of Manitoba (CASLPM) examines their state of progress with regard to the fair consideration of individuals educated outside of Canada. The Fairness Commissioner identifies progress opportunities and CASLPM responds with an action plan.

Many aspects of CASLPM's licensure process for internationally educated audiologists and speech-language pathologists are progressive. CASLPM allows qualified internationally educated applicants (IEAs) to work on a Provisional Certificate to Practice while receiving mentorship supports from an experienced professional and completing a learning plan. In place since the 1960's, CASLPM's mentorship program is well supported by its membership and is seen as an important way to assist new practitioners, including IEAs, to be successful in the profession. Since mentorship activities are customized to the needs of each applicant, IEAs may also be able to address small gaps in training during the mentorship program while returning to practice and putting their skills to use.

CASLPM is working nationally with other provincial regulators of audiologists and speech-language pathologists on the development of a centralized approach to assessment of IEAs that will include a new online application portal, competency based entry-to-practice examination, a self-assessment tool and a best practice model for mentorship. Project development is expected to be complete in 2019 with implementation to follow.

The Fairness Commissioner calls for CASLPM to monitor and review the national project to ensure the licensure process is timely, cost effective and accessible for Manitoba IEAs ultimately ensuring Manitoba's Fairness Standard is central to this new system. The Fairness Commissioner also sees a need for improvements to CASLPM's web and print information for IEAs; fair consideration of security checks completed by the federal government for immigration purposes; and continued work on registration data collection that includes early discussions for reporting once a third party assessment process is introduced nationally.

In response to the progress opportunities identified by the Fairness Commissioner, CASLPM commits to:

- Maintaining a high level of involvement in the profession's national capacity building project with an interest to ensure any new systems or processes continue to be accessible, timely and cost effective for Manitoba IEAs
- Improving its web and print information
- Considering the acceptance of federal security checks
- Continued cooperation on data collection including work to gather meaningful data about Manitoba IEA's experience with a new national process

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

## Introduction

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

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

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

The 2017 Registration Review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

In this report, CASLPM's assessment and registration practice is evaluated in terms of its overall state of fair practice and for the purpose of identifying progress opportunities. This includes an analysis of CASLPM's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

This report is a public document and will be posted on the OMFC's website, submitted to the Minister of Education and Training and the Minister of Health, Seniors and Active Living.

## Context of the Profession in Manitoba

Audiologists assess auditory and vestibular function; treat and prevent auditory and vestibular dysfunction to develop, maintain, rehabilitate, or augment auditory, vestibular, and communicative functions and auditory and vestibular health.

Speech-language pathologists assess speech and language functions, related communication disorders, and swallowing functions; treat and prevent speech and language dysfunctions and disorders, and develop, maintain, rehabilitate, or augment oral motor communicative functions, vocal tract dysfunction, or elective modifications of communication behaviours, and enhance communication.

Practitioners are employed in both private and public practice in hospitals, health centres, clinics, and educational institutions. As of December 2016, CASLPM had 452 registered members.

Currently, there are no university programs in Manitoba that offer training for either profession. Manitobans wishing to pursue a career in either audiology or speech-language pathology train in other Canadian jurisdictions or internationally. Many Manitobans choose to train in the United States.

The entry-to-practice requirements for registration and licensure of both professions in Manitoba and across Canadian regulated jurisdictions may differ from the requirements of international jurisdictions.

In Canada, each profession, audiology and speech-language pathology, is regulated as a separate profession. Some countries consider the practice of both audiology and speech-language pathology practice as a single profession. Graduates from training programs in such jurisdictions typically do not meet the academic entry-to-practice requirements in Manitoba or other Canadian regulated jurisdictions.

CASLPM, as a member with the Canadian Alliance of Audiology and Speech-Language Pathology Regulators, is working to develop a national competency-based entry-to-practice assessment process to harmonize the registration requirements across regulated jurisdictions in Canada. This will be accomplished through a series of initiatives within the Centralization and Capacity Building Project for Audiologists and Speech-Language Pathologists. Once complete, all internationally educated applicants seeking registration and licensure to practice either audiology or speech-language pathology in Canada will be assessed using one consistent, competency-based process.

## Overview of Assessment and Registration Process

The College of Audiologists and Speech-Language Pathologists of Manitoba (CASLPM) regulates the professions of audiology and speech-language pathology in Manitoba under the authority of *The Regulated Health Professions Act* (C.C.S.M. c. R117) and successive regulations. Only persons licensed and registered with CASLPM may practice audiology or speech-language pathology and use the professional designations 'Audiologist' or 'Speech-Language Pathologist' in Manitoba.

### Qualifications

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Principal qualifications for registration include a Master's degree in Audiology or Speech-Language Pathology from an institution accredited by the Council for Accreditation of Canadian University Programs in Audiology and Speech-Language Pathology (CACUP–ASLP) or a Master's degree determined by the registrar to be equivalent to one earned in a CACUP–ASLP accredited program. A university program is deemed equivalent if the program meets the criteria of the Canadian Alliance of Audiology and Speech-Language Pathology Regulators (CAASPR) Academic Equivalency Framework.

Other requirements of applicants from programs outside of Canada include successful completion of a minimum of 350 hours of supervised clinical education meeting minimum hours in each of the components established by CASLPM; proficiency in English or French; and, for all who are not new graduates, currency of practise consisting of 750 hours of practice in the three years immediately preceding the application for registration.

### Assessment and Registration Process

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The following steps are involved in the assessment and registration of applicants from academic programs outside of Canada.

#### **Step 1 – Submit the Initial Application for Full Regulated Registration to the College of Audiologists and Speech-Language Pathologists of Manitoba**

Applicants must contact the Registrar to request an application package. Application to CASLPM requires the following:

- Completed Initial Application for Full Regulated Registration Form
- Proof of Identity and Current Legal Name. This may be established by providing photo ID such as a passport or a driver's license in combination with a birth certificate
- Official transcripts, sent directly from the Educational Institution to CASLPM
- Completed Minimum Academic Requirements Form



- Completed Summary of Clinical Practice Requirements Form, signed and notarized by the Educational Institution, sent directly to CASLPM
- A World Education Services (WES) Basic, Course-by-Course Evaluation
- Establishing eligibility to work in Canada by providing evidence of one of the following:
  - Canadian Citizenship
  - Permanent resident/Landed Immigrant of Canada status
  - Valid work permit which allows work in Canada
- Criminal Record Check
- Child Abuse Registry Check
- Adult Abuse Registry Check
- Establishing Language Proficiency in either English or French by demonstrating one of the following:
  - Evidence of completion of three or more years of post-secondary education, including the completion of an entire audiology or speech-language pathology university degree (consisting of both didactic learning and clinical practice), in either English or French.
  - Satisfactory score on an approved standardized language proficiency test in either English or French, achieved within two years of application for registration.
- Verification of prior registration from each jurisdiction (in Canada and elsewhere) in which the applicant is currently or has been registered or licensed to practice sent directly from the issuing organization
- Completed Employer Reference Form, attesting to currency of practise requirement of 750 hours of practice in the three years immediately preceding the Initial Application for Full Regulated Registration. This is not required of new graduates.

Once CASLPM receives a complete application, the applicant is asked to submit a processing fee of \$105.

All documentation must be in English or French or accompanied by an official translation.

The registrar reviews applications once all required documentation and full payment of the application fee is received. Applicants are informed of the status of their application in writing. If their degree is determined to be equivalent to one issued from a CACUP–ASLP accredited program, and all other application requirements have been met including demonstration of adequate professional liability coverage, applicants are granted a Certificate of Registration. The fee is \$330.75. They can then can apply for a Certificate of Practice as outlined in Step 2.

## **Step 2 – Submit the Certificate of Practice Initial Application and a Completed Provisional Mentorship Agreement to CASPLM**

To be able to practice as an audiologist or speech-language pathologist in Manitoba a registrant requires a Certificate of Practice. To obtain this, registrants must submit a Certificate of Practice Initial Application, secure a mentor and submit a Provisional Mentorship Agreement.

The Certificate of Practice Initial Application requires registrants to make a number of disclosures and declarations regarding their current and past practice and their practice intentions in Manitoba. The fee is \$441.

Registrants are required to secure their own mentor and a Mentorship Agreement must be submitted to CASLPM for approval by the registrar. CASLPM offers support to individuals who may have difficulty in securing a mentor.

## **Step 3 – Complete the Mentorship Program**

Once an individual has been granted registration with CASLPM on the provisional registry, their mentor has been approved and they have been granted a Certificate of Practice, the mentorship program can begin.

Participants must complete a self-assessment survey with the support and guidance of their mentor. The purpose is to help enhance awareness of the essential practice competencies of the profession.

They must also develop a learning plan. This involves transferring learning targets from the self-assessment survey, beginning a “learning process” chart and developing measurement criteria. The learning plan must be submitted to the registrar within 30 days of the Certificate of Practice being granted.

The mentorship period includes a minimum of 50 hours of mentorship activities, distributed evenly throughout a six-month period. As part of this program, the mentor must complete a minimum of 25 hours of observation of the provisionally regulated registrant in clinical practice activities. Observation may occur in person, by web conferencing or by review of videotaped sessions.

At the midpoint of the mentorship program an interim report, which includes a report of mentorship activities, must be completed and submitted to the registrar. A final report, completed learning plan and account of mentorship activity hours is due within 30 days of completing the mentorship program.

## **Step 4 – Apply for Full Regulated Registration**

Once the above requirements are complete and approved by the registrar, the applicant can apply for Full Regulated Registration.

## Appeal Process

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An individual whose application for registration is not approved, or whose application is approved subject to conditions, may appeal the decision to CASLPM Council.

## Time and Cost

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The time and cost required to be registered with CASLPM will vary depending on the circumstance of the applicant. The average time to assessment of an initial, complete application is one week. Once approved, qualified applicants with an approved mentorship agreement are granted a Certificate to Practice and can begin to work as Provisionally Regulated Registrants.

Upon satisfactory completion of the mentorship period, Full Registration is granted, usually within a month of application.

### Specific Costs (2017):

Third Party Credential Assessment	\$200 – \$300
Application for Full Regulated Registration	\$105
Initial Certificate of Registration	\$330.75
Initial Certificate of Practice	\$441
Annual Registration	\$330.75

Registration and practice fees are assessed according to the current practice year (January 1 to December 31) and are subject to annual increases.

## State of Progress

The College of Audiologists and Speech-Language Pathologists of Manitoba's self-assessment in the 2013 Registration Review focused on the need for improved information for internationally educated applicants. They noted a need for information on costs associated with their registration process; financial support opportunities; alternate careers and academic upgrading opportunities; appeal processes; how to access records; timelines and key dates in their registration process.

CASLPM understands the importance of clear, complete, accurate and easy to find information and the requirements under the Act. Since 2013, CASLPM has made improvements such as introducing an application checklist and introducing information about fees and processing times. However, more needs to be done to meet the Fairness Standard. Our recommendations are detailed in the analysis section that follows.

CASLPM, as a member of The Canadian Alliance of Audiology and Speech-Language Pathology Regulators, is currently involved in a Centralization and Capacity Building Project aimed at centralizing certain functions related to the assessment of Internationally Educated Applicants (IEAs) under a single body with the goal of better standardizing outcomes. Among other things, the project aims to improve access to licensing information and introduce a streamlined national assessment process for IEAs. The project was launched in October 2016 and its anticipated completion is September 2019. Further details of project deliverables are provided in the analysis section below.

Between 2011 and 2015, the majority of CASLPM's IEAs were educated in the United States (78 per cent). The remaining 22 per cent of IEAs were educated in seven other countries. By the end of 2015, 89 per cent of those educated in the United States were either provisionally or fully registered, compared to 47 per cent of those from other countries. This in large part is due to differences in educational models as outlined earlier in this report.

## Fair Practice Analysis

The Fairness Commissioner has identified the need for timely and effective registration, the recognition of qualifications acquired through professional work experience and the need for supervised practice opportunities as key substantive issues critical to realize progress among Manitoba regulators.

Following the Manitoba Fairness Standard, the Fairness Commissioner has the following commendations, comments and concerns about CASLPM's state of progress concerning these key fairness issues:

### Timely Registration

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*The assessment and registration process is structured efficiently (Manitoba Fairness Standard, 7.1)*

The current process is structured efficiently with the opportunity to practice on a provisional register for a period while receiving mentorship supports and meeting final requirements for Full Registration.

CASLPM is working with the Canadian Alliance of Audiology and Speech-Language Pathology Regulators (CAASPR) on a national Centralization and Capacity Building Project. One of the deliverables of this project is a self-assessment tool that will be available to applicants free of charge. This tool will give individuals a preliminary view of how they compare relative to Canadian entry-to-practice requirements and whether educational gaps exist that may need to be remediated. It could also support efficiency of CASLPM's registration process particularly if it has value in the assessment for the applicant.

*The assessment and registration process is periodically reviewed to ensure timeliness for internationally educated applicants (Manitoba Fairness Standard, 7.2).*

CASLPM will benefit from the CAASPR project, which aims to better standardize outcomes across jurisdictions. One of the project deliverables, a national web portal aimed at providing IEAs with information on the licensure pathway in Canada and a means of submitting their application and supporting documents electronically, may support a timely process.

*Communication with applicants is timely and systematic (Manitoba Fairness Standard, 7.3).*

To apply for registration with CASLPM, applicants must request an application package. The College responds quickly to these requests. Regulator data indicates that processing times for initial applications and applications for Full Registration are reasonable.

*The registration process is such that qualified internationally educated applicants have an opportunity to practice in some capacity within a year of application (Manitoba Fairness Standard, 7.4).*

Provisional Registration within six to eight weeks is common for qualified IEAs assessed as meeting CASLPM's education standard and eligibility requirements. Full Registration is possible within six months of qualifying for Provisional Registration once mentorship activity requirements are met.

Applicants assessed as having small gaps in their education may also be able to work under provisional registration provided they meet all other requirements and a remediation plan is developed and agreed upon. CASLPM will consider distance education courses, extended mentorship periods and additional mentorship activities among other approaches to address small gaps.

## **Recognition of Professional Work Experience**

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*Professional work experience is considered to determine qualification (Manitoba Fairness Standard, 5.10).*

*Regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience (Manitoba Fairness Standard, 5.11).*

Professional work experience is currently not a consideration in the determination of qualification by CASLPM.

Details of past professional employment are requested but knowledge and competencies acquired through this work experience are not currently assessed.

CASLPM will benefit from the national project led by CAASPR to develop a set of professional competencies for both audiology and speech-language pathology. Once the competencies are validated and finalized a list of performance indicators will be developed to inform and harmonize assessment tools. Written, competency-based, entry-to-practice exams for both audiology and speech-language pathology will be developed in a later phase of this project, expected in 2019. This could allow for assessment of knowledge and competencies acquired through work experience against objective standards and criteria.

*If Canadian work experience is a mandatory requirement, it is clearly justified (Manitoba Fairness Standard, 5.12).*

CASLPM does not require Canadian work experience, however, applicants must practice as Provisionally Regulated Registrants in Manitoba with mentorship from a registered member before they are eligible for Full Registration. This period of practice, with supports from an experienced practitioner, provides an opportunity for feedback and learning that encourages success.

## Supervised Practice Opportunities

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*Supervised practice opportunities are available for the purpose of assessment and gap training (Manitoba Fairness Standard, 5.13).*

CASLPM has a well developed mentorship program and calls on members to provide mentorship supports to Provisionally Regulated Registrants. At least 25 of the 50 required hours of mentorship involve observation and feedback by the experienced practitioner. Mentorship feedback is provided to the new registrant throughout the process as well as to CASLPM through interim and final reports.

Mentorship arrangements with targeted activities are also a means of allowing applicants to address small gaps that may be identified through the application assessment by CASLPM. This is progressive practice.

As a part of the national capacity build project, a model mentorship program will be developed based on best practices identified within the profession and from research into mentorship models in similar professions. Measureable outcomes expected from participants will come from the newly developed competency profile and performance indicators. CASLPM will have an opportunity to adopt this new model once it is complete. It is hoped that the new process will allow for new options to address gaps while keeping the same degree of flexibility for meeting small gaps under supervision as the current mentorship approach permits.

## Additional Fairness Concerns

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1. *Applicants are provided clear, complete, accurate and easy to find information about:*
  - 1.1 *the steps involved in the registration process*
  - 1.2 *the role of third-parties in the assessment and registration process*
  - 1.3 *what can be done to prepare for registration before migration*
  - 1.4 *qualification requirements*
  - 1.5 *criteria used to assess qualifications*
  - 1.6 *documentation requirements*
  - 1.7 *alternative documentation opportunities*
  - 1.8 *fees and common associated costs*
  - 1.9 *the length of time registration processes usually take*
  - 1.10 *key dates and timelines*
  - 1.11 *supports the regulator provides or other available supports of which the regulator is aware*
  - 1.12 *appeal process, timelines and fees*
  - 1.13 *access to records*

Although CASLPM provides much of the above information in its application package that is made available to applicants upon request, little information

about the licensure process is made publically available on its website. The following key information is not included in their application package:

- the steps involved in the registration process
- steps that can be taken pre-migration
- alternative documentation opportunities
- supports (financial and other)
- appeal process
- access to records

In the 2013 registration review, CASLPM identified the need to enhance and expand information available through its website and committed to doing so in their action plan. However, CASLPM's website is missing a big picture description of the registration process and the steps involved. To understand the Full Registration process the applicant must piece together information from the forms included in their application package or they have to contact CASLPM for information.

As part of the application package, the Application Checklist designed specifically for IEAs, developed since the last review, is undoubtedly helpful to an applicant compiling their documentation for submission of the initial application form for Full Registration. The application package itself does not explain the steps involved in the registration process, forms have headings that are not consistently titled, there are references to requirements that must be met, such as language, without necessary detail provided, and various terms such as provisional regulated registration/registrant are not introduced or properly explained. Language is used that makes sense to a regulator but is not self-explanatory to an applicant likely raising more questions than answers. An application guide for IEAs would be a helpful. Done well, this will reduce the burden on CASLPM to answer questions and explain processes.

Providing an application package upon request only, also makes the process less accessible. Best practice is to develop clear, complete, accurate and easy to find information all of which is available on the regulator's website. CASLPM's information, both on-line and print, continues to need improvement.

Although a national website will be developed through the Centralization and Capacity Building Project spearheaded by CAASPR it is not expected to be completed until 2019 and there is a need to deal with this now.

#### *4. Documentation requirements are reasonable.*

##### *4.2 Good character policy is clear and criminal record checks are warranted.*

CASLPM currently requires applicants to supply a criminal record check covering the period of time they lived outside of Canada. All permanent residents to Canada undergo a security check by the federal government as a condition of immigrating. Security checks conducted by the federal



government occur before visas are granted and are more reliable and thorough than what can be provided by the applicant. Because of this, it is the position of the OMFC that a criminal record check from the applicant's home jurisdiction is unnecessary. Knowing that a check has been completed by the federal government for immigration purposes should satisfy the need for an applicant to provide a record check for their time outside of Canada. Criminal record checks for an applicant's time in Canada are fair.

## Progress Opportunities

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

1. Monitor and review the national Centralization and Capacity Building Project and its impact on IEAs to ensure the licensure process is timely, cost effective and accessible.
2. Improve website and print information for IEAs addressing issues identified in the Analysis section of this report and missing criteria outlined in element number one of the Fairness Standard Guide.
3. Revise policy on record checks to be in line with the OMFC Fair Practices Standard.
4. Continue work on data collection and reporting and begin planning for data collection from CAASPR once a centralised application process and national examination system is introduced.

## Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that College of Audiologists and Speech-Language Pathologists of Manitoba take action regarding these progress opportunities.

## College of Audiologists and Speech-Language Pathologists of Manitoba – Action Plan

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

CASLPM’s Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2017 Registration Review to discuss implementation of activities and updates to the Action Plan. Action Plan updates will be posted on the OMFC’s website on an annual basis, following these meetings allowing any interested party to see the progress to date.

Progress Opportunity	Action(s)	Completion Date
<p>1. Monitor and review the national Centralization and Capacity Building Project and its impact on IEAs to ensure the licensure process is timely, cost effective and accessible.</p>	<p>The President and Registrar of the College serve on the CAASPR Board of Directors.</p> <p>In addition, the Registrar of CASLPM currently serves as Chair of the CAASPR Board of Directors and will remain a part of the CAASPR Executive until spring 2019.</p> <p>These comprehensive accountabilities assure that the College’s efforts to improve its registration processes align and integrate with the national centralized application process to attain:</p> <ul style="list-style-type: none"> <li>• consistent registration requirements which are timely, cost-effective, and accessible</li> <li>• enhanced public protection, and</li> <li>• continued adherence to labour mobility legislation</li> </ul> <p>The centralized application process will serve both IE and DE candidates applying for registration to practice either audiology or speech-language pathology across Canadian regulated jurisdictions.</p>	<p>Ongoing</p>
<p>2. Improve website and print information for IEAs addressing issues identified in the analysis section of the progress report and missing criteria</p>	<p>The College will improve website and print information re:</p> <ul style="list-style-type: none"> <li>• the steps involved in the registration process</li> <li>• the role of third-parties in the assessment and registration process</li> </ul>	<p>June 2018</p>

Progress Opportunity	Action(s)	Completion Date
outlined in element number one of the Fairness Standard Guide.	<ul style="list-style-type: none"> <li>• what can be done to prepare for registration before migration</li> <li>• qualification requirements</li> <li>• criteria used to assess qualifications</li> <li>• documentation requirements</li> <li>• alternative documentation opportunities</li> <li>• fees and common associated costs</li> <li>• key dates and timelines</li> <li>• appeal process, timelines, and fees</li> </ul> <p>In addition, the College will link its website with the national Online Portal when it becomes operational and the pre-arrival resource is available for use by internationally educated applicants.</p>	Anticipated fall 2019
3. Revise policy on record checks to be in line with the OMFC Fair Practices Standard.	<ul style="list-style-type: none"> <li>• Review information provided by OMFC as to evidence that may be available through other sources (immigration)</li> <li>• Determine if the evidence available from other sources meets the criteria, as set out in College regulation; and if so</li> <li>• Develop and release information as part of the application package, that a candidate may provide to outside sources to have the information sent directly from source to the College to support the candidate's application.</li> <li>• PROPOSED: Make a change in policy regarding record checks and ensure this is clear in all applicant information</li> </ul>	Within 6 months of receipt of information from OMFC
4. Continue work on data collection and reporting and begin planning for data collection from CAASPR once a centralized application process and national examination system are introduced.	<ul style="list-style-type: none"> <li>• Confirm Centralized Application Process</li> <li>• Request transfer of jurisdiction-specific data to CASLPM annually, within the context of the Centralized Application Process. This provision will be included in an MOU with CAASPR which details the service agreement between the two parties as part of the Centralized Application Process</li> </ul>	Ongoing through September 2019  Draft MOU Anticipated Fall 2018

Progress Opportunity	Action(s)	Completion Date
	<ul style="list-style-type: none"> <li>Actual Data transfer will begin once the Centralized Application Process is in place.</li> </ul>	

<p style="text-align: center;"><b>College of Audiologists and Speech-Language Pathologists of Manitoba</b></p> <p style="text-align: center;"><b>Comments</b></p>
<p>The College of Audiologists and Speech-Language Pathologists of Manitoba (the College) acknowledges its commitment and responsibility to ensure fair registration processes with regards to all applicants.</p> <p>Furthermore, as a signatory to the Agreement on Internal Trade, Chapter 7 Labour Mobility, which came into force for regulated professions, including audiology and speech-language pathology, 1st April 2009, the College also acknowledges its responsibility to work with its fellow Canadian regulators to harmonize entry-to-practice requirements across jurisdictions, to facilitate the mobility of professionals from one Canadian regulated jurisdiction to another, while ensuring public safety, consumer protection and the integrity of the professions.</p> <p>To this end, the College, through its membership in the Canadian Alliance of Audiology and Speech-Language Pathology Regulators (CAASPR), committed available resources to develop a national competency-based entry-to-practice assessment process to harmonize the requirements across regulated jurisdictions in Canada.</p> <p>In October 2016, CAASPR began work on a series of initiatives under the umbrella of the “Centralization and Capacity-Building Project for Audiologists and Speech-Language Pathologists”. The overriding purpose of this project is to centralize functions related to the assessment of internationally educated applicants to better standardize registration processes and outcomes across jurisdictions. This will be achieved by developing and refining certain tools to support the application assessment process.</p> <p>The Centralization Project includes:</p> <ul style="list-style-type: none"> <li>Review and update of Essential Competency Profiles and performance indicators for both professions</li> <li>Developing and implementing a national competency-based entry-to-practice examination for both professions in both English and French</li> <li>Creating a national Online Portal for internationally and domestically educated applicants to facilitate the application process</li> <li>Developing a pre-arrival resource for internationally educated applicants accessible through the online portal</li> <li>Establishing national language proficiency standards and approved options to verify meeting the standards</li> <li>Developing a national mentorship model for internationally and domestically educated applicants</li> </ul>

**College of Audiologists and Speech-Language Pathologists of Manitoba**

**Comments**

This Action Plan, as submitted to OMFC, represents the College's efforts to improve its registration processes, within the context of its commitment to the national centralization project, to achieve a consistent approach to the registration of internationally educated applicants in Manitoba and across Canadian regulated jurisdictions, to enhance public protection and labour mobility.

## Statement of Compliance

CASLPM's role in the development of a new national process for the professional regulation of audiology and speech-language pathology is important. I trust CASLPM's involvement will help ensure changes are consistent with Manitoba's Fairness Standard. I look forward to hearing more about the outcomes of this project in 2019 when completion is anticipated and to learning about IEA's experience with changes once implemented.

CASLPM's engagement in OMFC lead activities will be important as other Manitoba regulators may benefit from the lessons learned from their involvement in this exciting national Centralization and Capacity-Building project.

Clear, complete, accurate and easy to find information is central to a progressive registration process and CASLPM's commitment to work on their website and print information is an important step towards this.

We value the work CASLPM has committed to and we are pleased to offer support where needed. I would like to wish CASLPM and its board much success with this meaningful work.



Ximena Munoz  
Manitoba Fairness Commissioner





## Appendix I: 2011-2015 Registration Data

The College of Audiologists and Speech-Language Pathologists of Manitoba reports annually to OMFC on the registration of internationally educated audiologists and speech-language pathologists to Manitoba. The OMFC will continue to work with CASLPM on the collection of registration data and will begin planning for the collection of additional data when a national, third party assessment process is implemented.

CASLPM received 117 total applications from 2011-2015. Among those, 78 or 67 per cent were internationally educated applicants (IEAs).

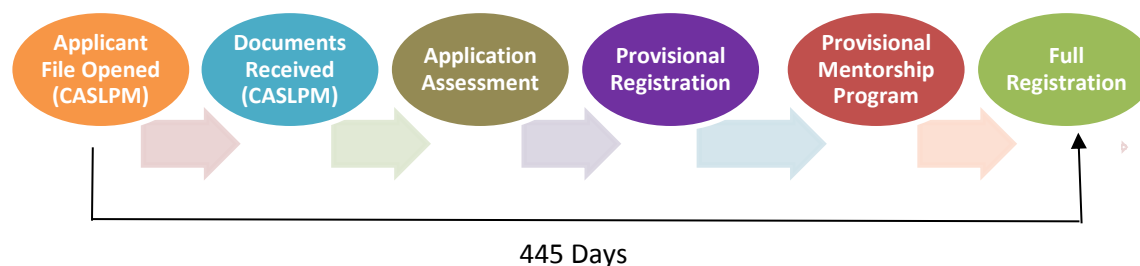
Those 78 IEAs had education from eight different countries. The top country of education was the United States with over 78 per cent of applicants. India and the Philippines ranked second and third, respectively.

With regard to licensure outcomes, 62 per cent of the 78 IEAs obtained full registration by the end of 2015 and 19 per cent were provisionally registered. The remaining applicants were either still in process or had closed files.



For those 48 that obtained full registration, the average time to do so upon applicant file opened by CASLPM was 445 calendar days, or just over 14 months.

### Average Time to Full Registration



The shortest time from when an IEA's file was opened by CASLPM to when full registration was obtained was just over one month, while the longest time was almost two and a half years.

### Analysis of 2011-2015 regulator data on internationally educated applicants provided by the Manitoba Bureau of Statistics.

For additional context, there were nine immigrant landings for NOC 3141 - audiologists and speech-language pathologists between 2011-2015 (Immigration, Refugees and Citizenship Canada. Prepared by Manitoba Education and Training).



## Appendix II: 2017 Registration Review Process

The OMFC's 2017 review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
<b>Registration Review Workshop</b>	<ul style="list-style-type: none"> <li>Group meeting between OMFC and regulators</li> <li>Latest data and research presented</li> <li>Fairness Standard, review focus and process presented</li> <li>Review schedule provided</li> </ul>	June 10, 2016
<b>Progress Report</b>	<ul style="list-style-type: none"> <li>CASLPM report on its fair practice progress</li> <li>Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities</li> <li>Progress opportunities identified</li> <li>Recommendation from Fairness Commissioner to address progress opportunities</li> </ul>	September 21, 2017
<b>Progress Meeting</b>	<ul style="list-style-type: none"> <li>CASLPM and Fairness Commissioner discuss report and possible actions CASLPM is considering addressing progress opportunities</li> </ul>	October 16, 2017
<b>CASLPM Action Plan</b>	<ul style="list-style-type: none"> <li>CASLPM's Action Plan submitted to OMFC</li> </ul>	November 2, 2017
<b>2017 Registration Review Report</b>	<ul style="list-style-type: none"> <li>Report submitted to CASLPM</li> <li>Report contains the review findings, CASLPM's Action Plan, and the Fairness Commissioner's Compliance Statement</li> </ul>	November 16, 2017
<b>Registration Review Closeout Meeting</b>	<ul style="list-style-type: none"> <li>CASLPM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how CASLPM's action plan will inform the relationship moving forward</li> <li>Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Seniors and Active Living and uploaded on OMFC website</li> </ul>	December 11, 2017

### Review participants:

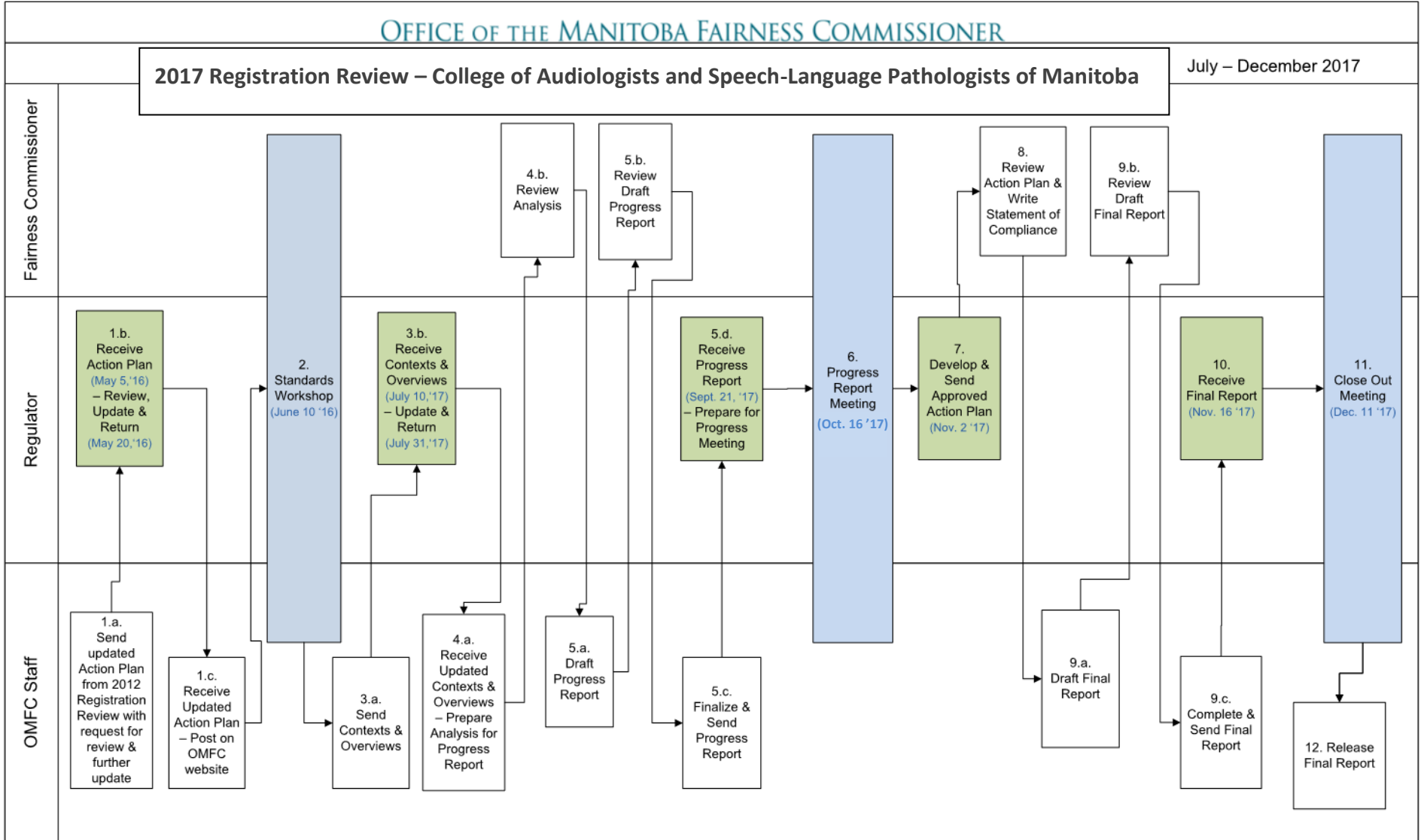
Lori McKietruk, Registrar, College of Audiologists and Speech-Language Pathologists of Manitoba



# OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

## 2017 Registration Review – College of Audiologists and Speech-Language Pathologists of Manitoba

July – December 2017







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FAIRNESS COMMISSIONER

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