

# 2017 Registration Review Report

## College of Dietitians of Manitoba



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## Executive Summary

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

CDM's licensure process for internationally educated dietitians (IEDs) is progressive. Professional work experience is assessed and a practicum assessment allows IEDs the opportunity to demonstrate clinical competence under supervision in the field.

Many internationally educated applicants possess nutritionist-level training and lack the degree of clinical training required for a dietitian. IED licensure outcomes are low in this profession and many internationally educated applicants may pursue work as nutritionists, an unregulated occupation in Manitoba.

Subsequent to the Office of the Manitoba Fairness Commissioner's (OMFC) 2012 registration review, CDM took steps:

- improving registration information with introduction of a new, dedicated web section, a talking PowerPoint and IED Guidebook. This includes the addition of appeal information as well as employment and alternative career information
- introducing a practicum interview process to better select IED applicants for its practicum assessment
- adopting an alternative documentation policy

The Fairness Commissioner sees two progress opportunities for CDM: firstly, to explore allowing IEDs an alternative assessment pathway with access to the newly developed Knowledge and Competency Assessment Tool (KCAT) in Ontario; and secondly, to continue to work with the OMFC on data collection to ensure we have a good picture of IED timelines and outcomes.

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

- to engage the College of Dietitians of Ontario to allow Manitoba IEDs access to the KCAT assessment
- if feasible, to establish dates and cost for writing the KCAT assessment in Manitoba
- to promote the value of the KCAT to Manitoba IED applicants
- to establish the KCAT as an alternative to CDM's credential/practicum assessment licensure pathway
- to continue to work with the OMFC to ensure accurate data collection

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

## Introduction

The Fairness Commissioner conducts registration reviews following her mandate under *The Fair Registration Practices in Regulated Professions Act* (Act) to review the assessment and registration practice of regulatory bodies subject to the 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.

This 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, the College of Dietitians of Manitoba's (CDM) assessment and registration practice is evaluated in terms of its overall state of fair practice and for purpose of identifying progress opportunities. This includes an analysis of CDM'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 and submitted to the Minister of Education and Training and the Minister of Health, Seniors and Active Living.

## Context of the Profession in Manitoba

Dietitians organize, conduct and supervise programs in nutrition, diet and food service. Practitioners have skills in translating medical and nutrition information into practical healthy eating plans. They provide individualized nutrition advice to help people make healthy choices. Dietitians are employed in private and public sectors, including hospitals, nursing homes, and educational institutions.

In Manitoba, the dietitian profession is the only regulated nutrition profession. Many people with academic training in the nutrition sciences work as nutritionists, which is not a regulated occupation in Manitoba. The difference between these roles lies in the additional practicum training Dietitians possess and the more advanced clinical services offered. This enhanced level of technical and practicum training is also what distinguishes the Canadian model of dietetic practice from many international jurisdictions where nutritionist level training is common.

Life long learning is mandatory for all dietitians registered in Canada. Dietitians must annually participate in quality assurance /continuing competence program throughout their career ensuring they continue their education while they are in practice. Within in this program, all dietitians' submissions undergo a peer review and one in 25 undergoes a full audit of their submission. Some Canadian Colleges require minimum practice hours within a defined time period as well as have dietitians undergo practice audits with both stated within their provincial legislation. This is not yet enforced in Manitoba.

As of December 2016, there were 456 registered dietitians in Manitoba trained. Provincial statistics indicate that 16 internationally educated dietitians (IEDs) immigrated to Manitoba from 2011 to 2016. Labour market demand for dietitians in Manitoba is steady, with greater demand in northern regions.

Internationally educated dietitians bring diverse cultural experiences that enhance practice within the professional dietetic community.

## Overview of Assessment and Registration Process

The College of Dietitians of Manitoba (CDM) regulates the profession of dietetics in Manitoba under the authority of *The Registered Dietitians Act* (C.C.S.M. c.R39) and Regulation (234/2004). Only persons registered with the CDM can work in the role of a dietitian and use the title of 'Dietitian', 'Registered Dietitian', 'Graduate Dietitian,' and 'Dietetic Intern' in Manitoba.

### Qualifications

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Main qualifications required for registration as a dietitian include a baccalaureate degree from an accredited program in human nutritional sciences and completion of an accredited dietetic internship program. Individuals must also successfully complete the Canadian Dietetic Registration Examination (National Exam).

### Assessment Registration Process

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For internationally educated dietitians, the key steps in the assessment and registration process are:

#### Application

Applicants first arrange a credential assessment from a credential assessment agency recognized by CDM and then apply to CDM. Applicants complete a CDM application form, pay an initial application fee and assessment fee and supply the following documentation:

- a directly submitted credential assessment report from either World Education Services (WES – Canada), the International Qualifications Assessment Service(IQAS), or the University of Toronto, Comparative Education Services
- original or notarized transcripts of university degree sent directly from the university to CDM
- course descriptions from the calendar of the university the applicant attended
- a copy of each degree or certificate of graduation
- a detailed summary of internship/practicum education program
- a letter from the education program director that states that the program contained experience in Clinical/Therapeutic Nutrition, Food Service Administration, Community Health and was supervised by a registered dietitian
- completion of the Practical Summary Sheet



- original or notarized copy of graduation certificate from a dietetic internship or practicum training. The certificate must be sent directly from the facility to the College office
- copy of license or membership from previous regulatory body
- if applicant has earned their degree in a language other than English or French, proof of language proficiency. A variety of language tests with specified scores is accepted: TOEFL, IELTS, CanTest, CLB.
- if applicable, continuing education and professional development documentation
- for applicants in Canada more than one year, a vulnerable sector search, an Adult Registry Check and a Child Abuse Registry Check. For those in Canada less than a year, a criminal records check from the law enforcement agency in their home jurisdiction
- proof of identity by way of a passport

If documents are not in English or French, translations are required.

CDM's Board of Assessors evaluates applications. The initial assessment takes four to six weeks.

Applicants who meet CDM's qualification requirements are eligible to write the Canadian Dietetic Registration Examination and qualify for Graduate Dietitian Registration.

Those deemed to have gaps in academic training are required to complete coursework and those with gaps in dietetic training may need to undergo a panel interview and practicum assessment. Panel interviews assess the applicant's clinical training and professional experience to determine whether a practicum assessment is necessary.

#### **Practicum Assessment**

CDM's practicum assessment is a nine to twelve week program that assesses an applicant's practical skills.

Practicum assessments are arranged by CDM through the Manitoba Partnership Program (MPP). This includes the provision of a preceptor and employment placement. Assessments typically take three weeks to three months to arrange. Assessment results are communicated to CDM by the MPP coordinator. There is an administration fee and weekly assessment fees.

#### **Graduate Registration and the Canadian Dietetic Registration Examination**

The next step is for applicants to register as a 'Graduate Dietitian' and apply for and write the Canadian Dietetic Registration Examination (National Exam).

The National Exam is a multiple-choice format, computer-based exam, four hours in length. The exam evaluates fundamental dietetic practice knowledge. It is written in May and November. Candidates usually receive their results within six weeks. Candidates who fail the exam may rewrite the exam up to two additional times.

## Registration

Upon successful completion of the national exam, applicants can apply for full registration. A minimum of \$5 million in liability insurance is needed. Insurance can be obtained through an employer, Dietitians of Canada or other insurance providers. Applicants must also pay CDM's \$575 registration fee.

## Appeal Process

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Registration decisions that deny or condition registration can be appealed to CDM's Council. Applicants must appeal in writing, specifying the reason for appeal within 30 days of receipt of the decision. Appeal hearings are scheduled within 90 days of notification and appeal decisions are delivered within 90 days of the hearing.

## Time and Cost

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The time and cost to register as a dietitian vary depending on the circumstance of the applicant.

Internationally educated dietitians with academic credentials judged to be substantively equivalent to the Canadian standard, including the practicum component of the standard, can register in less than a year. Graduate Dietitian registration is possible within six weeks of completed application. Full registration will require the successful completion of the bi-annual, fixed date national exam and will add up to seven months to the process.

Direct registration costs total approximately \$1,500. Additional, associated costs may be incurred securing and translating documents and preparing for the national exam.

The time and cost to register are significantly extended and increased if academic upgrading and a practicum assessment are needed. University coursework is costly and may require a year or more to complete. The practicum assessment will take up to 12 weeks and cost up to \$2,150.

## Direct Costs

Initial Application Fee	\$80
Assessment Fees	
• Academic Assessment	\$250
• Practicum Assessment	\$250
• Both	\$400
Total	\$480 (application fee, both assessment fees)
Practicum Program	\$350 Administrative fee \$150/week \$1,800/12week max
Canadian Dietetic Registration Examination	\$525 \$525 rewrite
Insurance	\$90-\$120
Graduate Dietitian Registration	\$47.92/month
Dietitian Registration	\$575

## State of Progress

The College of Dietitians (CDM) is committed to the fair assessment and recognition of internationally educated dietitians (IEDs).

CDM's licensure process for IEDs involves meeting academic qualifications, internship requirements and then passing the Canadian Dietetic Registration Examination.

CDM's assessment process has several progressive features. Most notably this includes:

- the assessment of professional work experience to determine qualification and if necessary, the extent of practicum required. An innovative, panel interview process is used to ensure the practicum assessment conducted by the Manitoba Practicum Program (MPP) will be successful
- IEDs have practicum assessments arranged by CDM through MPP. Individuals are provided a preceptor and a workplace for their assessment. MPP is responsible for running practicum programs for graduates of the University of Manitoba and has two open spots set aside for non-traditional applicants, including IEDs.
- the Practicum Program and Graduate Registration provide applicants exposure to Canadian practice under supervision and support timely registration
- for those with gaps in academic qualification, remedial coursework is available at Manitoba universities
- CDM's process benefits from the nationally developed Canadian Dietetic Orientation and Self-Assessment Tool

CDM's registration data indicates a low success rate for IEDs. Only six per cent of IED applicants between 2011 and 2015 received full registration. This low success rate reflects the nutritionist level of qualification of many IED applicants.

### 2013 Registration Review and Recent Progress

CDM underwent an OMFC registration review in 2013, participating in a two-day self-assessment workshop. At this time, CDM identified a need to improve its registration information, develop a formal alternative documentation policy, revise its criminal record policy and provide appeal training for council members.

Subsequently, CDM took steps:

- improving registration information, including the introduction of a new, dedicated web section and Guidebook for IEDs. The new registration material is impressive including a helpful talking PowerPoint, step-by-step assessment and registration information, and immigration and financial resource information

- introducing appeal information for CDM’s assessment and registration decisions
- introducing employment and alternative career information on CDM’s website
- reviewing and revising its criminal records policy such that the security checks from the IED’s home jurisdiction are required only for those who have resided in Canada for less than a year
- adopting an alternative documentation policy

### Progress Opportunities

Based on a pan-Canadian initiative in the dietitian profession, a new, dedicated assessment for IED has been developed, the Knowledge and Competency Assessment Tool (KCAT). Currently the new assessment is being piloted and administered by Touchstone Institute in Ontario on behalf of the College of Dietitians of Ontario (CDO), the regulatory body for dietitians in Ontario. The purpose of the KCAT is to assess the foundational knowledge and competency of IEDs against Canadian standards for newly graduating dietitians. KCAT is a multiple-choice format exam with a knowledge-based component and a competency-based, case scenario component. It costs \$400 for the exam. Other administrative costs may be charged.

The KCAT offers a promising alternative assessment pathway for IEDs applying in Ontario. CDM, however, sees an opportunity for progress, if Manitoba IED applicants could have access to the assessment. For qualified IEDs in Manitoba, KCAT may offer a timelier alternative to CDM’s credential/practicum assessment pathway.

CDM has worked cooperatively with the OMFC to supply registration data on Manitoba’s IEDs. Continued work improving data collection will be helpful to ensure we have a good, fact-based picture of timelines and outcomes. This data may also be helpful to support any future considerations to improve the process.

### Additional Fairness Concern

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*English and French language proficiency policies are fair: Where test scores expire during an applicant’s registration process, a variety of relevant evidence of continued language proficiency is considered as an alternative to re-testing (Manitoba Fairness Standard, 6.3).*

CDM’s English language proficiency policy requires applicants needing to supply language test results do so with test results dated within two years of application.

CDM reports they have not encountered an applicant with expired test results and that, if they had someone in this circumstance, they would not likely ask for a retest. This is a fair approach, as people should only need retesting if circumstances suggest it is warranted.

The possibility of waiving the two-year expiration dating policy should be made clear in CDM's application guide.

*Documentation requirements are reasonable: Good character policy is clear and criminal record checks are warranted (Manitoba Fairness Standard, 4.2).*

Subsequent to the 2012 OMFC review, CDM revised its criminal records policy such that only IED applicants in Canada less than a year are required to supply records checks from their home jurisdictions.

The Fairness Commissioner, however, still has a concern with CDM's revised policy. Landed immigrants, including those in Canada for less than a year, should not be required to supply records checks for their home jurisdictions because the federal government has already conducted a security check and so this requirement is unnecessary.

To explain, as a condition of securing landed status, the individual has undergone a security check by the federal government. Security checks conducted by the federal government occur before individuals are granted visas and are more thorough than what can be arranged by the applicant. Anyone with a permanent resident card has undergone a federal security check. This includes landed immigrants in Canada less than a year.

Criminal record checks for an applicant's time in Canada are fair. Checks from an applicant's home jurisdiction may be warranted only if the applicant has not successfully passed the federal government security check, receiving landed status.

## Progress Opportunities

The Fairness Commissioner sees the following opportunities for progress regarding the College of Dietitians of Manitoba's assessment and registration practice:

1. Provide a competency based assessment alternative for return to practice and IEDs instead of the traditional credential assessment by the Board of Assessors.
2. Continuing work with OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for IEDs applicants in Manitoba.

## Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that the College of Dietitians of Manitoba take action regarding the above progress opportunity.

## College of Dietitians of Manitoba – Action Plan

In response to the Fairness Commissioner’s recommendation, the College of Dietitians of Manitoba (CDM) proposed the following Action Plan as of November 14, 2017.

Progress Opportunity	Action(s)	Completion Date
1. Provide a competency based assessment alternative for return to practice and IEDs instead of the traditional credential assessment by the Board of Assessors.	1. Present to the College of Dietitians of Ontario (CDO) the interest to establish the KCAT assessment outside of Toronto, ensuring Manitoba has the opportunity to offer this to registrants.	November 2017
	2. If there is interest, establish possible dates for writing the KCAT.	February 2018
	3. Establish a cost for writing the KCAT in Manitoba.	February 2018
	4. Present the KCAT as an alternative to the Board of Assessors of the College as an alternative to a credential assessment.	February 2018
	5. Present to CDM Council for approval of the KCAT as an alternative pathway for registration assessment.	April 2018
	6. Write an educational piece for registrants on the KCAT to promote the value of the assessment.	May 2017
2. Continuing work with OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for IEDs applicants in Manitoba.	1. Continue to work with OMFC to ensure data collection is accurate and reflects the timelines collected.	December 2017

### Action Plan Follow-Up

A planned follow-up meeting with CDM and the OMFC will occur January 2019 to discuss the implementation status of the Action Plan.



## Statement of Compliance

The College of Dietitians of Manitoba's Action Plan is a positive, significant response to the progress opportunities identified in this report.

These actions will support fair practice and align with the intent of *The Fair Registration Practices in Regulated Professions Act* to improve licensure processes for internationally educated dietitians in Manitoba.

The College of Dietitians proposal to work with its counterpart in Ontario to create access to a newly developed KCAT assessment for Manitoba IEDs is exciting. The College has a history of adopting practices working well in other provinces. A notable case in point is its recent adoption of Alberta's practicum interview; a best practice strategy to ensure people are good candidates and the practicums are successful.

The province and Manitoba IEDs benefit from the College's strong leadership and commitment to progressive practice.

I look forward to our future engagement.



Ximena Munoz  
Manitoba Fairness Commissioner



## Appendix I: 2011-2015 Registration Data

The College of Dietitians of Manitoba (CDM) reports annually to OMFC on the registration of internationally educated dietitians in Manitoba.

CDM received 93 total applications between 2011 and 2015. Among these applications, 12 per cent were internationally educated applicants (IEAs).

The top country of education was the Philippines, representing 31 per cent of IEAs. This was followed by India, representing 23 per cent of applicants.

### Assessment and Registration Process



### Outcomes and Time

With regard to licensure outcomes, 9 per cent of IEAs obtained full registration by the end of 2015. Of the remaining applicants, 9 per cent were provisionally registered; 46 per cent were in process; 36 per cent had withdrawn or been refused.

With regard to licensure timelines, the average time to full registration upon application to CDM was 322 calendar days or just under 11 months.



This analysis of 2011-2015, CDM applicant registration data was provided by the Manitoba Bureau of Statistics.

For additional context, immigrant landings for dietitians, NOC code 3132, indicates that between 2011 to 2015 Manitoba had 12 landings.

**Source: Immigration, Refugees and Citizenship Canada. Prepared by Manitoba Education and Training.**



## Appendix II: 2017 Registration Review Process

The OMFC's 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>Report on CDM fair practice progress</li> <li>Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities</li> <li>Progress opportunity identified</li> <li>Recommendation from Fairness Commissioner to address the progress opportunity</li> </ul>	October 3, 2017
<b>Progress Meeting</b>	<ul style="list-style-type: none"> <li>CDM And Fairness Commissioner discuss report and possible actions CDM is considering addressing the progress opportunity</li> </ul>	October 24, 2017
<b>CDM Action Plan</b>	<ul style="list-style-type: none"> <li>CDM's Action Plan submitted to OMFC</li> </ul>	November 14, 2017
<b>2017 Registration Review Report</b>	<ul style="list-style-type: none"> <li>Report submitted to CDM</li> <li>Report contains the review findings, CDM's Action Plan, and the Fairness Commissioner's Compliance Statement</li> </ul>	November 28, 2017
<b>Registration Review Closeout Meeting</b>	<ul style="list-style-type: none"> <li>CDM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how CDM's action plan will inform the relationship moving forward</li> <li>Registration Review Report submitted to Minister of Education and Training, the Minister of Justice and uploaded on OMFC website</li> </ul>	December 19, 2017
<b>Action Plan Follow-up</b>	<ul style="list-style-type: none"> <li>Meeting between CDM and OMFC to discuss status of action plan implementation</li> </ul>	January, 2019

### Review participants:

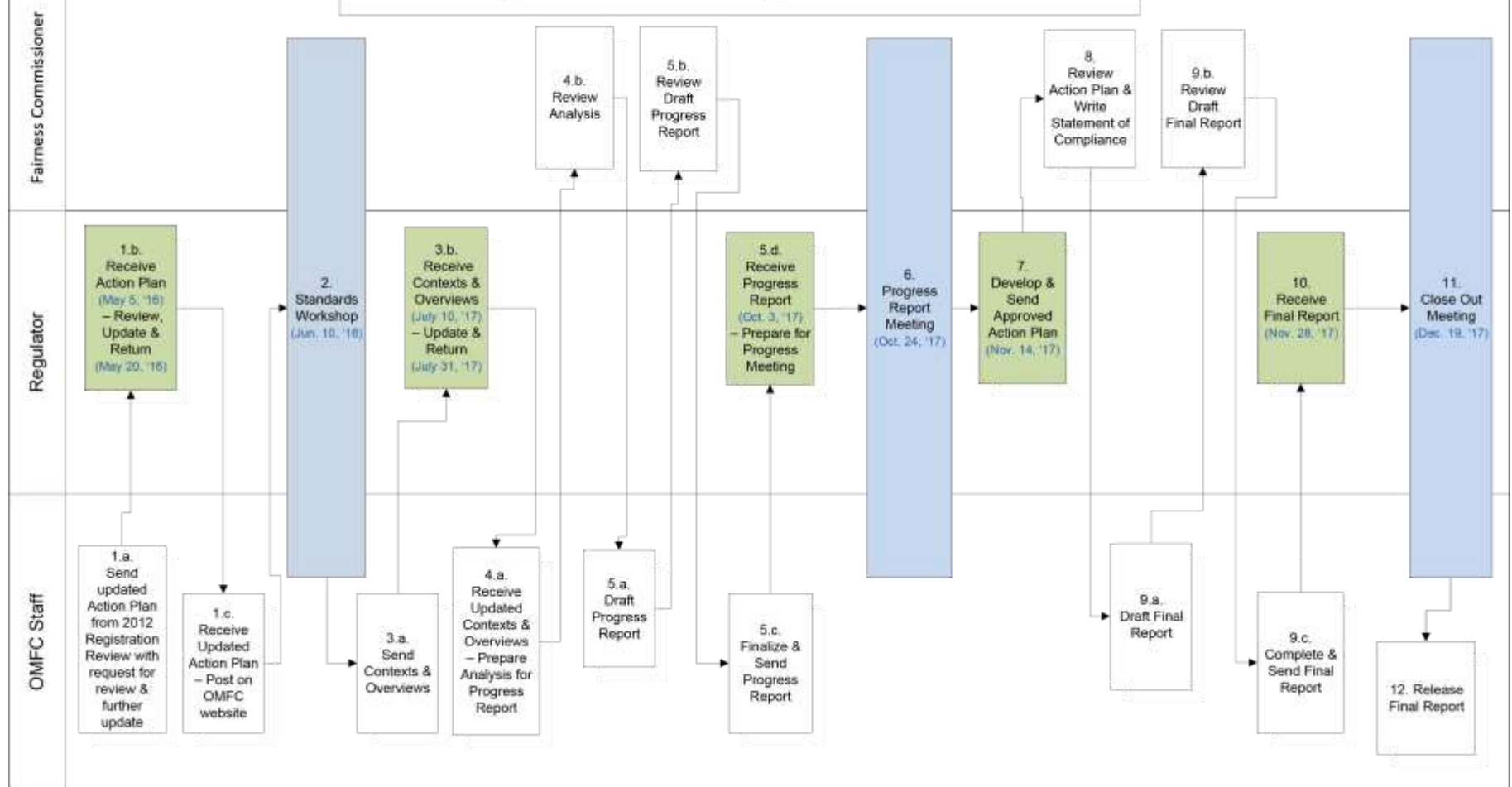
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# OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

## 2017 Registration Review – College of Dietitians of Manitoba

July – December 2017











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