

2016 Registration Review Report

College of Licensed Practical Nurses of Manitoba



Table of Contents

Executive Summary	1
Introduction.....	2
Context of the Profession in Manitoba	3
Overview of Assessment and Registration Process.....	4
State of Progress.....	8
Fair Practice Analysis	12
Progress Opportunities.....	16
Fairness Commissioner’s Recommendation.....	16
College of Licensed Practical Nurses of Manitoba Action Plan	17
Statement of Compliance	23
Appendix I: 2011-2015 Registration Data.....	24
Appendix II: 2016 Registration Review Process	26

Executive Summary

The Office of the Manitoba Fairness Commissioner (OMFC) 2016 Registration Review Report examines the College of Licensed Practical Nurses of Manitoba (CLPNM) state of progress with regard to the fair consideration of internationally educated nurses (IENs).

CLPNM is committed to fair registration practice with many progressive policies in place. The licensure process for IENs has undergone significant evolution over the past several years. CLPNM has a dedicated Clinical Competence Assessment in place that allows for a strong assessment of qualification. The Practical Nurse Qualification Recognition (PNQR) Program provides IEN bridge training and a key pathway to licensure.

IENs have experienced significant challenges in the licensure process with assessment delays as well as limited spots in the PNQR Program. Many IENs apply and are assessed in both the LPN and RN professions and there is limited co-ordination between these professions in the province.

The Fairness Commissioner sees a leadership role for CLPNM in a multi-stakeholder environment and identifies several progress opportunities: additional ways for IENs to receive professional orientation and address gaps; reducing duplication and inefficiencies for IENs applying between the RN and LPN professions; improved options for delivery of the PNQR Program; and research into communication issues in the workplace. Continued work on registration data collection and analysis between CLPNM and the OMFC will also be helpful.

In response to the progress opportunities identified by the Fairness Commissioner, CLPNM has committed to working with stakeholders to:

- Continue to provide Professional Practice Seminars on an as needed basis;
- Work to enhance transparency of NNAS Advisory Reports, including allowing applicants to review the full details of the reports;
- Continue to work to improve PNQR Program, including additional opportunities for practicums through Continuing Education;
- Work to articulate and better understand differences between RN and LPN licensure processes;
- Explore incorporating communication course into PNQR Program and continue to participate with regulatory groups and stakeholders discussing language proficiency issues; and
- Continue to work with OMFC to improve data collection for the registration process.

The Fairness Commissioner sees CRNM's Action Plan as a positive, cooperative response to the review.

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 2016 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 Licensed Practical Nurses of Manitoba's (CLPNM) 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 CLPNM'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

Licensed practical nurses provide nursing services and care for patients in a variety of work environments. They work in partnership with other health-care providers planning, implementing and evaluating care for clients throughout the life cycle.

In Canada, the nursing profession is differentiated into three regulated nursing groups: licensed practical nurses (LPN), registered nurses (RN) and registered psychiatric nurses (RPN). The chief difference between these types of nursing roles lies in the increasing breadth and depth of the education needed as well as the nature and scope of practice permitted. Most regions of the world only licence registered nurses. The Canadian model of nursing practice also differs from many regions with its emphasis on independent practice and clinical judgement.

Given the differences in practice internationally, the level of expertise required and the public safety issues involved, a rigorous assessment of qualifications and the provision of professional orientation is needed for internationally educated nurses (IENs).

The LPN profession in Manitoba took a significant step forward in 2012 with the introduction of a Clinical Competence Assessment (CCA) and an integrated bridge training program for IENs, the Practical Nurse Qualification Recognition (PNQR) Program at Assiniboine Community College. In 2014, the National Nursing Assessment Service (NNAS) was created to evaluate IEN academic qualifications against the nationally harmonized Canadian entry-to practice competencies of each of the Canadian nursing professions.

There are approximately 3,300 practicing LPNs in Manitoba, making it one of the larger regulated health professions in the province. The recognition of internationally educated nurses is a critical resource to ensure a healthy supply of practitioners. According to the Manitoba Nursing Labour Market Supply Report 2015, the province has 467 LPN position vacancies – 281 in the South, 44 in the North and 142 in Winnipeg (<http://www.gov.mb.ca/health/nurses/docs/mnlms15.pdf>).

In the 2011–2015 period, 1,586 internationally educated nurses landed in Manitoba (Source: Immigration, Refugees and Citizenship as prepared by Manitoba Education and Training).

Overview of Assessment and Registration Process

The College of Licensed Practical Nurses of Manitoba (CLPNM) regulates the practice of Practical Nursing in Manitoba and currently operates under the authority of *The Licensed Practical Nurses Act* (C.C.S.M. c. L125) and Regulation (27/2002). In Manitoba, all individuals practising practical nursing and using the title Licensed Practical Nurse or the professional designation 'LPN', must be registered with CLPNM.

Qualification

There are two main qualifications needed in order to be eligible for registration as a licensed practical nurse in Manitoba: graduation from a Board approved, diploma in practical nursing program and passing the Canadian Practical Nurse Registration Examination (CPNRE).

For internationally-educated nurses (IENs), a nursing program considered by CLPNM's board to be substantively equivalent to an approved program is required. IENs may also be required to undertake a Clinical Competence Assessment and depending on the results, may be required to complete additional training either through Assiniboine Community College's Practical Nurse Qualification Recognition (PNQR) Program or Assiniboine Community College's Practical Nursing Refresher Program.

Application and Assessment Process

Step 1: Apply to National Nursing Assessment Service

For IEN applicants, the first step in the application process involves opening a file with the National Nursing Assessment Service (NNAS) in order to have their education evaluated against entry-level Practical Nursing education in Canada. This requires submitting a variety of documents (education, current and previous licensure, professional nursing work history, language proficiency) and paying a \$650 USD application fee.

Upon completed application to NNAS, applicants receive an Advisory Report in 8 to 12 weeks.

Step 2: Apply to College of Licensed Practical Nurses of Manitoba

Applying to CLPNM involves completing an assessment application form, paying a \$441 fee and submitting a variety of documents (identification, immigration status, non-nursing employment, criminal records and registry checks) and arranging for NNAS to submit the applicant's Advisory Report to CLPNM.

Within two weeks upon completed application, CLPNM will provide the applicant an initial assessment decision where applicants may be:

- deemed eligible to apply for Graduate Practical Nurse (GPN) Registration and to then apply to write the Canadian Practical Nurse Registration (CPNRE) Exam (a no-fee jurisprudence session must be completed);

The Graduate Practical Nurse designation allows individuals to work in an environment where the supervision of a Licensed Practical Nurse, Registered Nurse or Registered Psychiatric Nurse is readily available. The GPN registration is valid for up to 4 months, and is renewable for up to 24 months as long as the applicant is continuing to pursue the registration process. Three attempts to challenge the exam are permitted. Graduate practical nurse registration is revoked and an assessment that may or may not result in remedial course work is required upon a second failing;

- required to complete the Clinical Competence Assessment (CCA); or
- deemed to have significant gaps in qualification such that complete retraining is required to pursue licensure.

Step 3: If necessary, Clinical Competence Assessment

The Clinical Competence Assessment (CCA), conducted by Assiniboine Community College, is a 7-8 hour interview, role-play style assessment of the entry-level practical nursing competencies.

Upon referral from CLPNM, the time to schedule a CCA varies depending upon demand. As of September 2016 the wait time is about one year. Applicants are informed of their CCA results in 4 to 8 weeks.

As of September 2016, there is no fee for the CCA. It has funding support from Manitoba Health, Seniors and Active Living.

Step 4: If necessary, Bridge, Gap or Refresher Training

If applicants successfully demonstrate all of the required entry-level competencies of a licensed practical nurse in Manitoba on the CCA, they are eligible to apply for GPN registration and then to apply to write the CPNRE.

If gaps in skills, knowledge and judgement are found, a course of study prescribed by the CLPNM must be completed. This usually requires fulfilling 17 weeks of academic and practicum work through Assiniboine Community College's PNQR Program. CLPNM may also refer the applicant to complete courses and practicum in Assiniboine Community College's Practical Nursing Refresher Program.

The Practical Nursing Refresher Program offers 13 courses and practicums ranging from \$285-\$650 each. Courses are available online through distance education. Book costs range from \$128 to \$590.

If the CCA finds gaps too significant to be addressed by gap, bridging or refresher training, applicants will need to complete a Board approved Diploma in Practical Nursing program to pursue licensure.

Step 5: Registration Exam

For applicants with substantively equivalent education qualifications, or those successful on the CCA, those applicants who successfully complete gap, bridging or refresher training, the next step is to apply for GPN registration and then to apply to write the CPNRE.

The CPNRE is a 4 hour, multiple-choice exam that tests practical nursing knowledge applied critically in the context of the Canadian health care system. It costs \$420 plus a \$110.25 scheduling fee. Currently, the exam can be written in a four week window, three times a year.

Step 6: LPN Registration

Upon passing the CPNRE, the final step is to apply for Licensed Practical Nurse registration with CLPNM. The initial enrolment and active practicing registration fee is \$493.50 (initial enrolment \$105/active practicing registration \$388.50); active practicing registration must be renewed annually for a fee of \$388.50.

Appeal

A pre-appeal and appeal process is in place for CLPNM's assessment and registration decisions. Formal appeals cost \$200.

NNAS also has a review process in place for its evaluation of academic qualifications. The fee is \$500 USD and refunded if the applicant is successful.

Time and Cost

Depending on the circumstances of the applicant, the range of time and cost to register with the CLPNM varies markedly.

Upon completed application, for an IEN applicant who does not need to complete a CCA assessment, bridge or gap training, English or French language testing or upgrading, the entire registration process, including the NNAS Advisory Report and the CPNRE, may take less than 8 months and will cost roughly \$2,400 (NNAS fee, CLPNM application fee, CPNRE fee, CLPNM initial enrolment and active practicing registration fee) plus associated documentation costs.

The majority of IENs, however, require a CCA and gap, bridging or refresher training before licensure. This group faces a longer, costlier process. Wait times for a CCA can be a year or more with the time to registration often taking 2 to 3 years.

Many applicants require language testing and some may need English or French language upgrading, which will add several hundred dollars and can take time to arrange testing and improve proficiency.

Government funding support for the Clinical Competence Assessment helps keep costs down.

State of Progress

The College of Licensed Practical Nurses of Manitoba (CLPNM) is committed to the fair assessment and recognition of internationally educated nurses (IENs). Many aspects of CLPNM's registration practice for IENs are progressive.

At the time of the 2012 registration review, CLPNM was undergoing a significant change to its licensure process for IENs. Work with Assiniboine Community College, the Manitoba department of Health, Seniors and Active Living and funding from Health Canada's IEHP program led to the piloting of a new Clinical Competence Assessment (CCA) and Practical Nurse Qualification Recognition (PNQR) Program.

The CCA, offered by Assiniboine Community College, provides a powerful assessment tool allowing IENs to demonstrate what they know and can do. It is integrated with individualized bridge training offered through the PNQR Program. Concern has been raised about the potential conflict of interest with this arrangement. The same party responsible for the delivery of bridge training is responsible for the assessment to determine the need for it. Recognizing this issue, separation of these functions is under consideration for ongoing program delivery.

CLPNM has several notable progressive practices and policies in place:

- CLPNM documentation policies allow staff to act as guarantors for I.D. and for copying original documents. Alternative documentation is a possibility;
- once applicants have applied to CLPNM, expiration dating is applied to language tests only in circumstances where there is reason for retesting;
- previous registration and work experience are not required of recent nursing graduates;
- professional work experience is assessed to determine qualification both for the purposes of supplementing the required clinical component of an academic program and by way of a clinical competence assessment that allows applicants to show what they know and can do;
- for IENs with comparable academic qualification as well as relevant and current professional experience, the clinical competence assessment is not required;
- CLPNM offers IENs Professional Practice Seminars that provide valuable professional orientation;
- 'Graduate PN Registration' provides timely entry into practice, allowing IENs to practice with restrictions until they write the national exam;
- qualification standards and entry-level competencies are well defined and periodically reviewed. The Canadian Practical Nurse Registration Exam (CPNRE) has been subject to psychometric review and an occupation-specific language test, CELBAN, is accepted.

Since the 2012 review CLPNM has taken further steps to improve its practice:

- Registration information was improved in 2014 with the introduction of a dedicated IEN Guidebook that presents complete, applicant-friendly information about the registration process. An audio-based presentation on the assessment and registration process has been developed.
- Better written reasons are now provided for unfavorable assessment decisions and a pre-appeal process has been introduced.
- Since August 2014, the National Nursing Assessment Service (NNAS) NNAS is now the first-step, centralized application body for the nursing professions in Canada. For licensed practical, registered psychiatric and registered nurses, the NNAS verifies IEN documents and credentials, evaluates IEN academic qualifications for comparability to Canadian standards and provides a secure, centralized electronic repository for credentials and registration documents.

NNAS provides a more informed, sophisticated assessment of academic credentials than was previously available.

The result of these changes and activities is a licensure process for IENs that has developed a greater ability to meaningfully assess the qualifications and competence of applicants with international education and professional experience. Procedural fairness has improved with better registration information, more detailed assessment results and an improved appeal process.

Challenges

IENs face significant challenges with the current system of LPN licensure. Very few IENs are being licensed in a timely way and many find themselves waiting for assessment, bridge, gap or refresher training.

Key issues include:

- Transition to the NNAS in August of 2014 caused delays. In its first year of operation, NNAS Advisory Reports took an average of 5 months to be completed. OMFC understands NNAS timelines to deliver an Advisory report are improving - now taking 8 to 12 weeks.

CLPNM's IEN applications have dropped dramatically since the introduction of the NNAS. In 2015, 17 IEN applications were received compared to the previous annual average of 157 IEN applications for 2011 to 2014.

New language proficiency policies adopted as part of transition to the NNAS are also more restrictive and pose a challenge and potential delay.

- Capacity limitations for CCA assessments at Assiniboine Community College have been a major issue since its introduction. With over 646 IEN applications in the 2011-2015 period, or approximately 130 applications annually, together with an assessment and bridge training pathway that can handle less than a quarter of this group, an extensive backlog of people waiting for assessment and bridge training developed. Wait times have varied throughout this period, from several months to several years.

In 2015, CLPNM worked with Manitoba Health, Seniors and Active Living and Assiniboine Community College to temporarily improve CCA assessment capacity. As of September 2016, CLPNM posts a one year wait for CCA assessment.

- Assiniboine Community College's PNQR Program finished its pilot funding in the spring of 2016. Provincial funding was pending and the PNQR did not offer a Fall intake in 2016. The program is transitioning out of its pilot phase with provincial funding for delivery in 2017.

The PNQR Program is a key component of CLPNM's licensure process, providing an individualized bridge and gap training response for IEN applicants. A large majority of CLPNM's IEN applicants are assessed by the CCA as needing bridge training. As of September 2016, CLPNM reports 101 IENs on the waitlist for the PNQR Program.

Timely licensure opportunities are undermined by these challenges. Time out of practice deskills nurses, lowers success rates and increases the need for costly and time consuming remedial bridge, gap or refresher training.

Moving Forward

Moving forward, several measures deserve consideration:

- Additional bridge and gap training strategies are needed to provide more licensure opportunities for IENs. In 2012, the Fairness Commissioner recommended CLPNM consider alternative paths to registration in the circumstances where the applicant does not need the full PNQR Program. In light of capacity limitations of the PNQR Program, alternatives to provide gap training and professional orientation need to be explored. CLPNM has been open and willing to work with employers and others to develop workplace-based opportunities.

Continued effort and leadership from CLPNM will be needed to make progress with multiple stakeholders to develop and implement a workplace-based pathway;

- Better coordination is needed between the assessment of IENs in the LPN and RN professions. Many IENs initially apply to the College of Registered Nurses of Manitoba (CRNM), are assessed, and then go on to

seek registration as a licensed practical nurse with CLPNM. As it is currently functioning, it is not uncommon for IENs to undergo CCA assessments with CRNM and CLPNM and some even go on to bridge training in both – first for an LPN then for an RN. An articulated pathway and coordinated approach for assessment in these related professions makes sense. Efforts are needed to better utilize resources, maximize assessment capacity, reduce duplication and match IEN skill sets to the right nursing profession at the start of their process.

In Conclusion

There is a pressing need to address the significant number of IENs currently out of practice and stalled in the licensure process. Moving forward, a better articulation and integration of licensure pathways between the LPN and RN professions, as well as ensuring the availability of bridge and gap training opportunities will be keys to improving outcomes and timely licensure opportunities for IENs. CLPNM will need strong leadership and effective collaboration with stakeholders to meet this challenge.

Fair Practice Analysis

The Fairness Commissioner has identified the need for timely and effective registration, the recognition of qualifications acquired in 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 CLPNM's state of progress concerning these key fairness issues:

Timely Registration

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

As it is currently functioning, CLPNM's assessment and registration process is not structured efficiently. Specifically, there are a few issues:

- a) Limited capacity of the CCA and PNQR Program means limited licensure opportunities. Additional, workplace-based licensure pathways to meet qualification gaps and receive professional orientation would offer IENs a timely alternative to the PNQR program.

An articulated intake and assessment approach for the LPN and RN professions in Manitoba would help IENs avoid the time wasted pursuing licensure in two professions and help maximize assessment resources.

The OMFC recognizes CLPNM is responsible only for LPN licensure, not the RN profession. However, CLPNM has expressed a willingness to investigate what may be possible and can play a key role in moving forward. This will require working collaboratively with stakeholders to allow for and support an improved intake and assessment; for example, establishing effective protocols with the College of Registered Nurses of Manitoba to share application and assessment documents.

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

Periodic review of standards, exams and assessments is one of CLPNM's strengths. CLPNM was active in the development of Assiniboine Community College's CCA assessment and PNQR and continues to review them as they transition out of their pilot stages with Manitoba Health, Seniors and Active Living.

CLPNM participated with other provincial nursing regulators reviewing NNAS policies and procedures. Further review of the service is planned as the NNAS transitions out of its pilot stage.

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

CLPNM's communication with IEN applicants is timely and systematic.

CLPNM staff are helpful and supportive of IEN applicants. A process is in place to regularly review files and applicants are contacted when necessary to ensure any outstanding documents are brought to the applicant's attention. To be prompt, the College communicates by phone and e-mail, using mail only for decisions that need to be provided in writing. Progressive documentation practices also help minimize the need to re-supply documents.

NNAS provides a helpful online application portal that allows applicants to see the current status of their applications, including any outstanding documents from third parties. A toll free number to talk with NNAS staff is provided.

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).

Licensure within a year is possible for IENs deemed to have substantively equivalent academic qualification upon initial application to CLPNM. For this group, time into practice under Graduate PN Registration may take as little as 6 months.

In the 2011-2015 period, only a minority of IEN applicants, less than 10%, were eligible for Graduate PN Registration upon initial application. The majority of IENs required a CCA assessment and some form of bridge, gap or refresher training.

With wait times to schedule a CCA a year or more, the time to licensure under Full or Graduate PN Registration for the majority of IENs is well over a year.

Recognition of Professional Work Experience

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

Professional work experience is considered to determine qualification. If the clinical element of an applicant's academic program does not meet the criteria, their professional work experience will be assessed.

CLPNM also assesses professional work experience for the purpose of determining currency and to determine eligibility for a CCA. IENs with strong academic qualification and professional work experience may have the CCA waived.

The CCA itself provides IENs the ability to demonstrate qualifications and skills acquired through professional work experience.

These are progressive practices.

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

CLPNM has professional work experience standards and criteria in place for the purpose of supplementing a consideration of academic qualification and to determine the applicant's eligibility and need for the CCA.

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

CLPNM does not have a mandatory Canadian work experience requirement.

Supervised Practice Opportunities

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

CLPNM's 'Graduate PN Registration' allow applicants to work with practice restrictions until they pass the CPNRE Exam. Graduate registration is progressive as it supports timely entry to practice.

Given the public safety concerns in the nursing profession and the diversity of professional practice abroad as well as the limited training capacity in the province, a period of supervised practice to provide IENs professional orientation and integration support needs consideration. Exposure to Canadian practice under supervision promotes safe practice and success in licensure rates.

Regional health authorities and employers have expressed interest in supporting a workplace-based orientation gap training for IENs.

Additional Fairness Concerns

English and French language proficiency policies are fair (Manitoba Fairness Standard, Element 6).

The Fairness Commissioner has had a concern with CLPNM's language proficiency policies since 2013. CLPNM's language proficiency policies have become more restrictive. Applicants are required to meet higher levels of proficiency and more applicants need to meet the language proficiency requirement.

The OMFC understands these policy changes are a response both to the need to nationally harmonize language proficiency requirements in the nursing professions and to the communication challenges nursing regulators are seeing among IENs in practice. However, it is not clear that more stringent language proficiency policies are the solution. A better understanding of the communication challenges in the field together with improved IEN training about the role and communicative responsibilities of nurses are potentially more effective in addressing these problems.

With the introduction of the NNAS in August 2014, all applicants are required to supply language proficiency test results with exemptions only for first language applicants whose primary language, where they live and studied, is English or French, or where they have practiced safely in an English or French environment within the last two years. Moreover, language test results need to be dated within 6 months of application to NNAS. This means applicants in possession of valid language tests results, may have to start the process by taking a second test. Undergoing repeated language tests after having met the standard raises a fairness concern.

Legal exceptions notwithstanding, applicants have access to records that relate to their application for registration (Manitoba Fairness Standard, Element 11).

IENs receive a shortened version of their Advisory Report that compares their academic qualifications for comparability to Canadian standards. A more detailed report is sent to the regulatory body. It is not clear if information is provided to applicants by NNAS regarding the differences between the report they receive and the report the regulator receives. Nor is it clear how these further assessment details are disclosed to applicants.

Applicants have a right to access their records and need to be informed about how to access their full Advisory Report. They should be able to see the complete details about how their academic qualifications have been assessed against the Canadian standard.

Progress Opportunities

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

1. A leadership role for CLPNM ensuring the development of additional ways for IENs to receive professional orientation and address gaps;
2. Co-operating and collaborating with stakeholders and partners to improve the IEN licensure process, including:
 - Work with NNAS to provide IENs access to full Advisory Report assessment details;
 - Work with Manitoba Health, Seniors and Active Living, employers and Assiniboine Community College to continue to improve delivery options for the PNQR Program;
 - Work with CRNM to reduce inefficiencies and duplications for IENs in the RN and LPN licensure pathways;
3. Research into communication issues in the workplace will help ensure the right language proficiency policies are adopted;
4. Work towards developing a robust and comprehensive data base of registration processes and outcomes to better inform actions.

Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that the College of Licensed Practical Nurses of Manitoba take action regarding these progress opportunities.

College of Licensed Practical Nurses of Manitoba Action Plan

In response to the Fairness Commissioner’s recommendation, CLPNM proposed the following Action Plan as of November 28, 2016

CLPNM’s Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2016 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. A leadership role for CLPNM ensuring the development of additional ways for IENs to receive professional orientation and address gaps.</p>	<p>1. <u>Professional Orientation</u> The CLPNM will continue to provide the Professional Practical Seminars (PPS) for IENs seeking registration as licensed practical nurses in Manitoba. (2 intakes of the PPS have already been held.) The CLPNM hopes to provide two intakes per year or on an as needed basis, first priority going to those IENs who may be on wait lists for either the CCA or PNQR.</p> <p>2. <u>Address Gaps</u> Please see the response below to #2b.</p>	<p>Ongoing</p>
<p>2. Co-operating and collaborating with stakeholders and partners to improve the IEN licensure process, including:</p> <ul style="list-style-type: none"> • Work with NNAS to provide IENs access to full Advisory Report assessment details; • Work with Manitoba Health, Seniors and Active Living, Employers and 	<p>The CLPNM consistently cooperates and collaborates with multiple stakeholders in order to continuously make improvements to the registration process for IENs.</p> <p>CLPNM’s Credential Assessment Consultant (CAC) has been heavily involved with NNAS on various monitoring and improvement committees in order to improve the product and the service. The CAC has been involved with 7 committees prior to and since the launch of NNAS, August 12, 2014. Currently, the CAC is involved with 3 groups in order to improve/revise policies, to improve quality assurance, and to improve the assessment tool.</p> <p>a. <u>Advisory Reports:</u> The nursing regulatory bodies (RB) across Canada receive a more detailed and complex Advisory Report than the version</p>	<p>a. June 2017</p>

Progress Opportunity	Action(s)	Completion Date
<p>Assiniboine Community College to continue to improve delivery options for the PNQR Program;</p> <ul style="list-style-type: none"> • Work with CRNM to reduce inefficiencies and duplications for IENs in the RN and LPN licensure pathways. 	<p>received by the IEN applicant. The difference between the reports is that the RBs receive a list of attributes (competencies) that could not be found in the IEN applicant’s course syllabi. This is not to say that the IEN applicant does not possess these competencies; it is only to say that it was either missing from the nursing program or missing from the course syllabi. This is one reason why the NNAS does not provide this level of detailed information to the IEN applicant—in order to avoid confusion. In addition, the NNAS holds ownership of the Advisory Reports; they are not owned by the individual RBs. Therefore, the RBs cannot release these versions of the reports to the IEN. The CLPNM will continue to work with NNAS to enhance transparency wherever reasonable and possible.</p> <p>The CLPNM will revise their current Guide for IENs in order to advise applicants that if they wish to contact the CAC by email in order to book an appointment with the CAC to review their Advisory Report (the RB’s version) they may do so.</p> <p><u>b. Delivery Options for PNQR:</u></p> <p>The CLPNM continuously works with Manitoba Health, Seniors and Active Living (MHSAL) and Assiniboine Community College (ACC) in order to improve processes and make improvements to the PNQR program for IENs. While the PNQR program was still a Pilot, which ended March 31, 2016, the CLPNM was a member of the IEHPI Project 2.B PN QR Pilot—Working Group/Advisory Committee. This group met quarterly and consisted of CLPNM, MHSAL and ACC. Occasionally guests were invited, such as the OMFC. Once the Pilot ended, these group members continued to meet and still do so. (Note: employers will be invited to the table once post-Pilot processes for the PNQR have been developed and finalized.)</p> <p>The PNQR program consists of the following</p>	<p>b. Sept 2017</p>

Progress Opportunity	Action(s)	Completion Date
	<p>4 courses, 2 practicums and CPNRE prep:</p> <ul style="list-style-type: none"> • Canadian Healthcare Workplace • Nursing Skills Review • Pharmacology Review • Physical Health Assessment • Long Term Care • Acute Care • CPNRE Prep <p>IENs are referred to education depending on their individual/unique needs:</p> <ul style="list-style-type: none"> • <u>Full PNQR & Part Practical Nursing Refresher (PNR) program</u>—this includes all 4 PNQR courses, 2 PNQR practicums, 1-6 PNR courses and CPNRE Prep • <u>Full PNQR</u>—this includes all 4 PNQR courses, 2 PNQR practicums, and CPNRE Prep • <u>Part PNQR</u>—this includes 1 to 3 PNQR courses, 2 PNQR practicums and CPNRE Prep • <u>Part PNQR, PNR program and Gap Training</u>—this includes 1 to 3 PNQR courses, 1-2 PNR courses, 2 PNQR practicums, 1 day of individualized gap training and CPNRE prep • <u>Part PNQR and Gap Training</u>—this includes 1 to 3 PNQR courses, 2 PNQR practicums, 1 day of individualized gap training and CPNRE prep • <u>Culture Healthcare Workplace (CHW) course, Gap Training and Practicum</u>—this includes the CHW course, 1 day of individualized gap training, 2 PNQR practicums and CPNRE prep • <u>Culture Healthcare Workplace (CHW) course and Gap Training</u>—this includes the CHW course, 1 day 	

Progress Opportunity	Action(s)	Completion Date
	<p>of individualized gap training and CPNRE prep</p> <ul style="list-style-type: none"> • <u>Culture Healthcare Workplace (CHW) course and Practicum</u>—this includes the CHW course, 2 PNQR practicums and CPNRE prep <p>Please note that the Culture Healthcare Workplace course is now available through ACC's Continuing Education throughout the year. The CLPNM is also working with ACC to offer both practicums (Long Term care and Acute Care) through Continuing Education, which would also potentially be offered throughout the year. This will provide more opportunities and may decrease the registration process for some IENs.</p> <p>The CLPNM, MHSAL and ACC are also discussing the feasibility of developing rural intakes. The CLPNM expects to hear more from MHSAL regarding next steps in January 2017.</p> <p>c. <u>Working with CRNM</u></p> <p>The CLPNM has joined the Manitoba IEN Stakeholder Table (MIST). (A similar group used to be chaired by MB Health, but has been dormant since the fall of 2011.) The group convened for the first time in early October 2016, and intends to meet 3 times per year, or as needed. Members include: CLPNM, CRNM, CRPNM, MHSAL, nursing educators and employers. The operational focus for the group is for information sharing and discussion, issue identification, and collaborative problem solving related to qualification recognition, recruitment and workplace integration of IENs.</p> <p>The CLPNM will utilize this opportunity to better understand and articulate the differences between our processes and those of the CRNM. However, a dual assessment for LPNs/RNs would require buy-in from multiple stakeholders, and an</p>	<p>c. Ongoing</p>

Progress Opportunity	Action(s)	Completion Date
	<p>undertaking of this magnitude would be cost prohibitive for the CLPNM because of the resources, research and development required.</p>	
<p>3. Research into communication issues in the workplace will help ensure the right language proficiency policies are adopted.</p>	<p>The CLPNM remains committed to maintaining understanding/expertise in relation to language proficiency by ensuring the Credential Assessment Consultant (CAC) stays involved in national language working groups, updating her knowledge through ongoing professional development.</p> <p>The CAC is a member of NNAS' English Language Proficiency Test Group. This groups' sole focus is to revise the "triggers" for an applicant to be required to submit a language proficiency test, and ultimately to revise the language policy. This group convenes via teleconference on a monthly basis, and will continue to do so until the policy has been revised, approved and adopted.</p> <p>Please note that while NNAS' language policy states that an applicant's language test results can be no more than 6 months old when submitted to NNAS, the CLPNM will accept a test older than 6 months as long as it is no more than 2 years old when the applicant opens a credential assessment file with the CLPNM. This information will be provided in the Guide for IENs on CLPNM's website.</p> <p>The CAC is also a member of the Canadian Network of Agencies for Regulation's Language Proficiency Group. This group meets via teleconference on a quarterly basis. The groups' focus is to discuss best practices in language proficiency. Currently, the groups' main focus is on communicative competence, and how it should play a role in the licensure process.</p> <p>As the requirements surrounding language proficiency requirements is harmonized across all nursing regulators across the</p>	<p>Most is Ongoing, but the revision to the Guide is June 2017</p>

Progress Opportunity	Action(s)	Completion Date
	<p>country, any changes to language proficiency policies would require buy-in and support from all stakeholders.</p> <p>The CLPNM is committed to staying involved in the issue of language proficiency by continuing to participate in National working groups for language.</p> <p>The CLPNM will also explore the idea of incorporating a communication course into the PNQR and through continuing education (which would require both a content and an EAL expert), so that applicants can work on building their communicative competence to prepare them for the workplace.</p>	
<p>4. Work towards developing a robust and comprehensive data base of registration processes and outcomes to better inform actions.</p>	<p>The CLPNM is committed to continue to work with OMFC in order to implement processes, as resources allow, for the purposes of improving data collection.</p>	<p>Ongoing</p>

CLPNM Comments

The CLPNM's priority is our mandate to carry out our business in the public interest. We believe it serves the public to ensure that the required number of safe, competent and ethical LPNs are available to the health care system. The CLPNM remains committed to working collaboratively with all of our stakeholders to improve registration processes and timelines for all IENs deemed eligible to undergo the assessment process.

Statement of Compliance

The College of Licensed Practical Nurses of Manitoba's Action Plan is a positive, cooperative response to the progress opportunities identified in this review. These actions will improve fair practice for the assessment and registration of internationally educated nurses (IENs) and are consistent with the intent of *The Fair Registration Practices in Regulated Professions Act*.

Over the past several years, IENs have faced significant challenges seeking LPN licensure. Few are licensed in a timely way and many spend an extended period out of practice waiting for assessment or gap training.

CLPNM has a history of leadership, active engagement, and progressive practices. CLPNM's continued commitment to work collaboratively with the various stakeholders involved will be critical for progress moving forward.

I am pleased that we will be working to improve our data collection and analysis. This is an opportunity to better understand what is happening to IENs in the licensure process, particularly the extent of duplication and inefficiencies for those IENs applying in both the LPN and RN professions in Manitoba.

I trust CLPNM's actions and commitments to collaborate to improve the IEN licensure process will make a positive difference and look forward to our future engagement.



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

The College of Licensed Practical Nurses of Manitoba (CLPNM) reports annually to OMFC on the registration of internationally educated nurses to Manitoba.

CLPNM received 898 applications from 2011 to 2015. Among these applications, 71% or 639 were internationally educated applicants (IEAs).

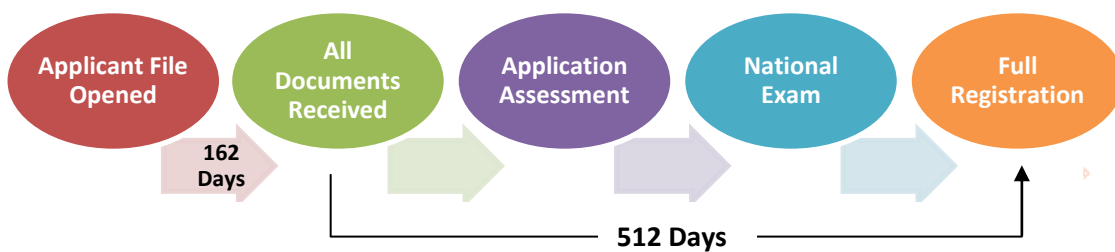
IEAs received education from 27 different countries. The top country of education was predominantly the Philippines at 70.1%, followed by those educated in India at 14.9% and Nigeria at 4.8%.

With regard to licensure outcomes, 104 or 16% of IEAs obtained full registrations by the end of 2015. The remaining applicants, were still in process or had withdrawn or been rejected.



For those 104 IEAs who obtained full registration, the average time to do so upon all application documents received by CLPNM was 512 calendar days, or 17 months. Those applicants that required a Clinical Competence Assessment averaged 18 months to full registration; those who did not required it averaged 12 months to full registration.

Average Time to Full Registration



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

For additional context, immigrant landings for individuals in this profession to Manitoba for 2011–2015 indicate:

Year	Landings
2011	14
2012	17
2013	24
2014	17
2015	31
Totals	103

The NOC code associated with these landings is 3233 Licensed Practical Nurses.

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

Appendix II: 2016 Registration Review Process

The OMFC's 2016 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
Registration Review Workshop	<ul style="list-style-type: none"> Group meeting between OMFC and regulators Latest data and research presented Fairness Standard, review focus and process presented Review schedule provided 	June 10, 2016
Progress Report	<ul style="list-style-type: none"> CLPNM report on its fair practice progress Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities Progress opportunities identified Recommendation from Fairness Commissioner to address progress opportunities 	October 11, 2016
Progress Meeting	<ul style="list-style-type: none"> CLPNM and Fairness Commissioner discuss report and possible actions CLPNM is considering addressing progress opportunities 	November 8, 2016
CLPNM Action Plan	<ul style="list-style-type: none"> CLPNM's Action Plan submitted to OMFC 	November 28, 2016
2016 Registration Review Report	<ul style="list-style-type: none"> Report submitted to CLPNM Report contains the review findings, CLPNM's Action Plan, and the Fairness Commissioner's Compliance Statement 	December 13, 2016
Registration Review Closeout Meeting	<ul style="list-style-type: none"> CLPNM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions & how CLPNM's action plan will inform the relationship moving forward Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Seniors and Active Living and uploaded on OMFC website 	December 16, 2016

Review participants:

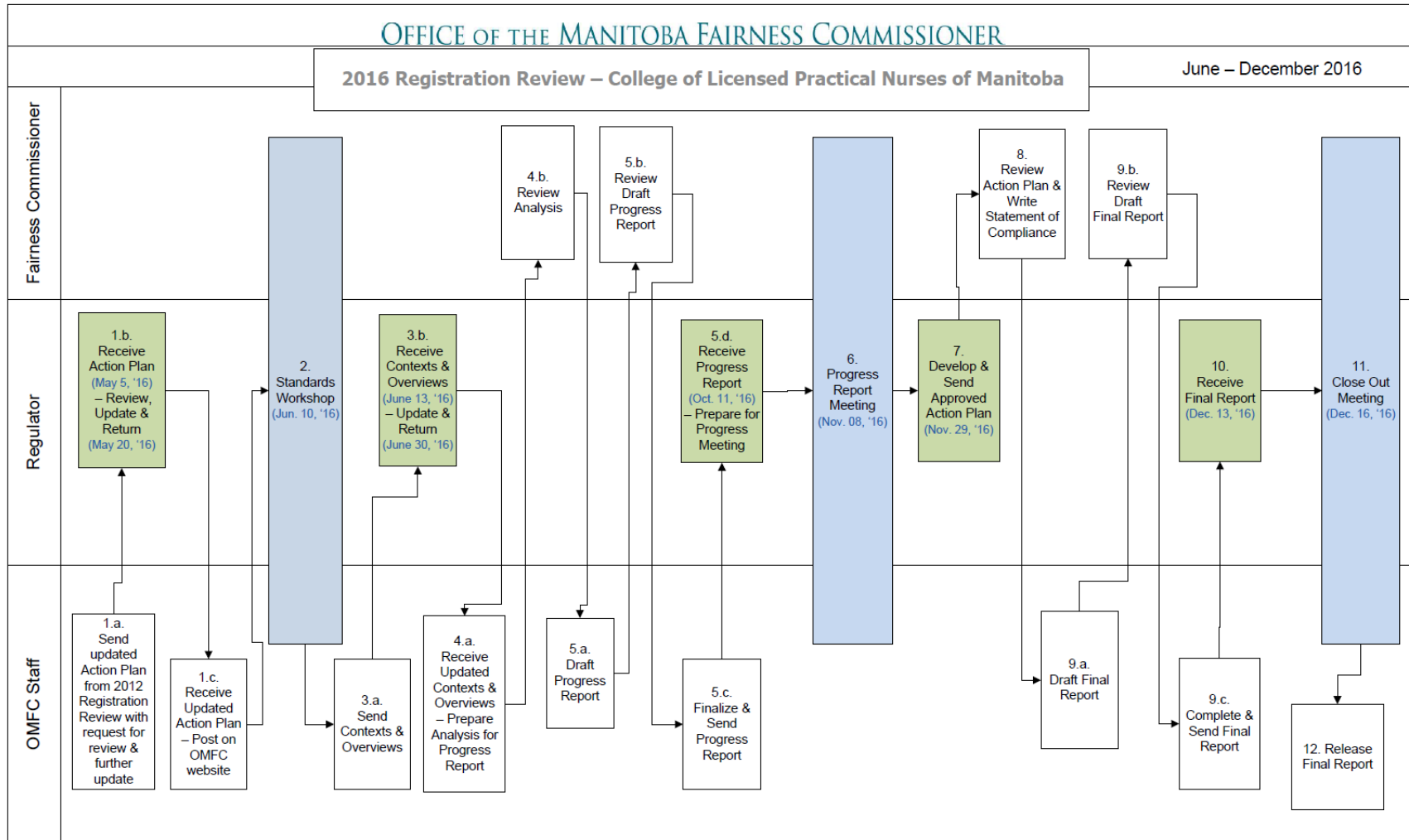
Jennifer Breton, Executive Director

Kathy Halligan, Credential Assessment Consultant

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

2016 Registration Review – College of Licensed Practical Nurses of Manitoba

June – December 2016





OFFICE OF THE MANITOBA
FAIRNESS COMMISSIONER

E: omfc@gov.mb.ca

T: 204-945-7353

TF: 1-800-282-8069 ext. 7353

301 – 155 Carlton Street
Winnipeg, MB R3C 3H8

manitobafairnesscommissioner.ca