

# 2017 Registration Review Report

## College of Physicians and Surgeons of Manitoba





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## Executive Summary

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

Progress in this profession since the 2013 registration review includes routine assessment of an IMG's post-graduate training earlier in the licensure process; participation in a review of the IMG program at the University of Manitoba resulting in, among other improvements, priority given to qualified Manitoba IMG applicants over out-of-province applicants; and the introduction of a new application guide with complete information for IMGs on this complex assessment and registration process.

A major challenge in this profession is that opportunities to acquire Canadian clinical experience needed for licensure are limited as there are typically far more applicants than seats in required programs. That a person does well on their medical exams and assessments is no guarantee they can complete the licensure process. In light of this, the Fairness Commissioner calls for CPSM to take a lead in the development of increased capacity and routes for qualified IMGs to receive licensure in Manitoba.

OMFC also sees a need for improvements in regard to the consideration of currency of practice qualifications of IMGs, including some consideration of experience obtained through work in Canada as clinical assistants. Additionally, there is a need for updates to CPSM's Application Guide for IMGs and continued work on registration data collection.

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

- Ensuring necessary updates are made to their IMG Application Guide, so that IMGs understand the benefits of submitting their application for medical registration early in their registration process, and that applicants from jurisdictionally recognised programs are given direction on their website to pertinent information on the College of Family Physicians site.
- Continue to work with the OMFC to provide accurate registration data, including any future changes to the licensure process

The Fairness Commissioner is encouraged by CPSM's commitment to ensure IMGs are well informed about their registration process so that they can make the right decisions early on. Where appropriate, the Fairness Commissioner will support and facilitate CPSM's actions.

## 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 CPSM'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 CPSM'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

Physicians or medical doctors diagnose and treat disease, injury and other physical and mental impairments. Family physicians assume responsibility for the provision and continuity of medical care to individuals and families.

The practice of medicine is the application of medical knowledge, skill and judgment for: the assessment and management of a physical, mental or psychosocial disease, disorder, injury or condition of an individual or group of individuals at any stage of the biological life cycle, including the prenatal and post-mortem periods; the prevention and treatment of physical, mental or psychosocial diseases, disorders, injuries and conditions, and the promotion of good health.

Currently in Manitoba there is a strong demand for family physicians, particularly in rural communities.

Manitoba Health, Seniors and Active Living, through the MB Healthcare Providers Network, provides a portal connecting healthcare providers with information and opportunities for those pursuing a career in health care in the province of Manitoba. The MB Healthcare Providers Network is responsible for posting vacancies for physicians and also provides information for International Medical Graduates.

While health human resource planning is not within the mandate of the College of Physicians and Surgeons of Manitoba, they report that determining the specific demand for physicians is difficult. One factor that contributes to this difficulty is the new practice habits of the latest generation of physicians, where practitioners often choose to restrict their hours of service.

In the medical profession, international medical graduates (IMGs) bring a wealth of culture, experience and linguistic diversity to serve Manitoba's diverse population. They are also a key resource to meet the physician needs of our community. Initially, most IMGs in Manitoba are Conditionally Registered with return for service undertakings in Manitoba's underserviced rural communities.

## Overview of Assessment and Registration Process

The College of Physicians and Surgeons of Manitoba (CPSM) regulates the practice of medicine in Manitoba under the authority of The Medical Act (C.C.S.M. c. M90) and Regulations (183/99, 104/2005 and 25/2003). CPSM licenses the practice of physicians including family physicians, specialists, clinical assistants, physician assistants, students, residents and medical corporations.

### Qualifications

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Current requirements for Full Registration in Manitoba as a family physician include:

1. The Licentiate of the Medical Council of Canada and Certification from the College of Family Physicians of Canada (LMCC and CCFP), or
2. The Licentiate of the Medical Council of Canada and family medicine certification obtained through an examination administered by the Collège des médecins du Québec, and
3. A two year postgraduate clinical training program acceptable to CPSM. The program must have been completed at the University of Manitoba, Faculty of Medicine and contained a core of eight weeks in general medicine, eight weeks in general surgery, eight weeks in obstetrics, and eight weeks in paediatrics.
4. If applicable, satisfactory completion of the Manitoba Practice Assessment Program (MPAP) – for conditional registrants who are unable to obtain the LMCC and certification in family medicine from the CFPC.

Current academic and postgraduate clinical training requirements for Conditional Registration in Manitoba as a family physician include:

1. A medical degree from a medical school that at the time the candidate completed the program was listed in the World Directory of Medical Schools.
2. Satisfactory completion of a two year postgraduate clinical training program acceptable to CPSM.

Or

Satisfactory completion of a one year postgraduate clinical training program acceptable to CPSM plus three years family practice experience in the five years immediately preceding the date CPSM receives the application for Conditional Registration.

Or

Evidence of certification or eligibility for certification by the College of Family Physicians of Canada (CFPC) or the American Board of Medical Specialties, Family Medicine (ABMS-FM).



Applicants applying for either Full or Conditional Registration must complete the Application for Medical Registration, Review of Qualifications. The applicant will be notified by CPSM whether or not they meet the academic and postgraduate clinical training requirements. If they do not meet the requirements for either Full or Conditional Registration they will receive written notification from CPSM with an outline of reasons.

### **Medical Council of Canada Examinations Required for Conditional Registration**

As a minimum, CPSM requires a valid pass standing in the Medical Council of Canada Examination (MCCEE) to apply for Conditional Registration. Applicants who hold certification or who are eligible for certification by the College of Family Physicians or the American Board of Medical Specialties, Family Medicine are not required to have a pass standing in the MCCEE at the time of application to the College, but must successfully complete the Medical Council of Canada examinations to apply for Full Registration.

It should be noted that the University of Manitoba requires a valid pass standing in the Medical Council of Canada Qualifying Examination Part I for entry into their programs for IMGs (PRA-FP or MLPIMG).

### **Assessment Process for Conditional Registration**

Most applicants for Conditional Registration must satisfactorily complete an assessment acceptable to CPSM. Physicians who hold certification or who are eligible for certification by the College of Family Physicians or the American Board of Medical Specialties, Family Medicine are not required to complete an assessment. The College of Family Physicians of Canada has a Recognized Training and Certification outside Canada route to certification without examination. Approved jurisdictions currently include: the United States of America, Australia, Ireland and the United Kingdom.

Applicants must:

- have successfully graduated from accredited postgraduate training in family medicine in a jurisdiction where the standards for accreditation of postgraduate family medicine training and the criteria for certification are judged comparable and acceptable to the CFPC
- hold certification in family medicine in that jurisdiction
- have met all other requirements for Certification in the CFPC
- have met all other requirements for licensure and have been granted registration to practice in a Canadian province or territory

Those who have obtained one of the accepted designations through a practice eligible route are not eligible to apply for CCFP without examination.

## **Pathways to Conditional Registration**

The registration process for international medical graduates is complex, involving multiple stakeholders and assessments. To achieve Full Registration with CPSM, applicants who are not certified by or initially eligible for certification by the CFPC or the American Board (ABMS-FM) must complete one of the following three pathways. Opportunities are limited and highly competitive for each of these paths.

**Path One** – International Medical Graduates Assessment for Conditional Licensure (PRA-FP) – a three-month assessment program for IMGs who are ready to practice with support of a mentor and supervisor.

**Path Two** – Medical Licensure Program for International Medical Graduates (MLPIMG) – a one-year training program for IMGs who require some training.

**Path Three** – Residency Training – A two-year residency training program arranged through the Canadian Resident Matching Service (CaRMS).

Concurrent with applying to either Path One or Path Two, applicants must open an account with [Physiciansapply.ca](http://Physiciansapply.ca) and submit their required documentation. [Physiciansapply.ca](http://Physiciansapply.ca) offers a physician credentials repository where the applicant's international medical credentials are gathered, verified and permanently stored.

Through [Physiciansapply.ca](http://Physiciansapply.ca) individuals can apply for medical registration in a Canadian province or territory, register for exams and see their results, request source verifications of their credentials, have their credentials translated, and share documents with registered stakeholders.

IMGs applying under Path One in Manitoba must complete the application for medical registration, Review of Qualifications. The applicant will be notified by CPSM whether or not they meet the academic and postgraduate clinical training requirements. If they do not meet the requirements for Conditional Registration they will receive written notification from CPSM with an outline of reasons.

For IMGs applying under Path Two in Manitoba, the College will review the postgraduate clinical training and notify the candidate and the MLPIMG whether or not the training is acceptable.

For IMGs applying under Path Three in Manitoba, and who have matched to the University of Manitoba family medicine training program, the applicant would be issued enrollment on the CPSM Educational Register.

### **Path One**

#### **Practice Ready Assessment - Family Practice (PRA-FP)**

The PRA-FP, a three-month on the job assessment, is intended to assess practice skills necessary for a primary care physician in Manitoba. It is offered by the Max Rady College of Medicine, University of Manitoba.

Minimum eligibility requirements set by the University of Manitoba include:

- permanent resident (landed immigrant) or Canadian citizen status
- a minimum of one year of postgraduate medical education acceptable to CPSM, which includes eight weeks in each of Internal Medicine, General Surgery, Pediatrics and Obstetrics/Gynecology
- a pass standing on the MCC Evaluating Exam and the MCC Qualifying Exam Part I
- successful completion of the Clinicians Assessment and Professional Enhancement (CAPE) administered by the University of Manitoba
- two years of postgraduate clinical training acceptable to CPSM, **or**, one year acceptable postgraduate clinical training and three years family practice during the five years preceding the date CPSM receives an application for Conditional Registration
- practice experience primarily in general practice (primary care, family medicine) for at least 12 months anytime in their career
- evidence of currency of practice – minimum of 12 consecutive months of independent clinical practice as a General/Family Practitioner in the five years immediately preceding the program application deadline
- fluency in spoken and written English – required to have a TOEFL score of at least 96 (TOEFL-iBT) with minimum score of 24 in all components or International English Language Testing System (IELTS) with a minimum score of seven in each component with an overall band score of no less than seven. Both TOEFL (TOEFL-iBT) and IELTS are considered valid for two years from the date taken
- meeting the academic requirements for Conditional Registration with CPSM

Applications are reviewed by the IMG Selection Committee taking into account a variety of relevant factors. A CPSM review of an applicant's postgraduate training, an employment offer, and an interview by the program are all required. The selection is competitive and applicants with the highest rankings are invited to participate in the interviews with sponsoring employers.

Successful applicants begin the program with a one-month mandatory orientation at the University of Manitoba. This is followed by a three-month assessment conducted in non-urban areas in Manitoba. Applicants are issued Conditional Registration while in the orientation and assessment phase of the program.

Upon successful completion of the program, IMGs are eligible to continue to practise under Conditional Registration. For one year following the PRA-FP, applicants participate in a mandatory Mentorship Program and have an assigned mentor who provides additional support and guidance. An assigned medical

practice supervisor is responsible to review issues and provide monitoring reports to CPSM for the first three months of practice, and thereafter, as requested by CPSM throughout the time the physician holds Conditional Registration. Participants are required to meet a four-year return of service agreement in an underserved area.

The PRA-FP is also very competitive with only five per cent of all applicants accepted between 2011-2016.

## **Path Two**

### **Medical Licensure Program for International Medical Graduates (MLPIMG)**

This 13-month training and assessment program is designed to enhance an IMG's previous training and address their specific learning needs to better prepare them for practice as primary care (family practice) physicians in Manitoba. This program is also offered by the Max Rady College of Medicine, University of Manitoba.

Minimum eligibility requirements set by the University of Manitoba include:

- permanent resident (landed immigrant) or Canadian citizen status
- a minimum of one year of postgraduate medical education acceptable to CPSM, which includes eight weeks in each of Internal Medicine, General Surgery, Pediatrics and Obstetrics/Gynecology
- a pass standing on the MCC Evaluating Exam and the MCC Qualifying Exam Part I
- a pass standing on the National Assessment Collaboration OSCE (NAC exam)
- practice experience primarily in general practice (primary care, family medicine) for at least 12 months anytime in their career
- evidence of currency of practice – minimum of 12 consecutive months of independent clinical practice as a General/Family Practitioner in the five years immediately preceding the program application deadline
- fluency in spoken and written English – required to have a TOEFL score of at least 96 (TOEFL-iBT) with minimum score of 24 in all components or International English Language Testing System (IELTS) with a minimum score of seven in each component with an overall band score of no less than seven. Both TOEFL (TOEFL-iBT) and IELTS are considered valid for two years from the date taken

Applications that meet the minimum stated requirements are reviewed by the IMG Selection Committee. The Selection Committee takes into account previous medical experience, pass standing on the MCC exams, references and other factors. Applicants are short-listed and the top listed candidates are interviewed. Manitoba residents meeting all program eligibility criteria proceed directly to interview.

Over a ten year period, from 2007-2016, approximately 15 per cent of all applicants were accepted into the program. Applicants can increase their competitiveness by obtaining a pass standing on the MCC Qualifying Exam Part II, ensuring scores on all MCC examinations are high, having more recent practice experience and doing well in the interview.

Applicants with the highest ranking, based on application, NAC OSCE and interview rankings are invited to participate in further interviews for the purpose of securing employment with a sponsoring regional health authority.

Successful MLPIMG applicants must have a written offer of employment from a Regional Health Authority or other employer. This includes an agreement by the RHA/employer to fund the IMG for the period of training and orientation and an agreement by the IMG to return service to the sponsoring employer.

Successful applicants are admitted to the Medical College's Postgraduate Medical Education (PGME) program and must be registered on the Educational Register of CPSM while enrolled in a four-week structured orientation prior to beginning the MLPIMG and for the duration of the program. The program itself consists of 13 four-week PGME rotations that cover emergency medicine, family medicine, gynaecology, obstetrics, internal medicine, paediatrics and psychiatry.

Upon successful completion of the MLPIMG, IMGs are eligible to obtain Conditional Registration with CPSM. Conditional Registration involves a return of service agreement that requires four years practice in primary care in the region of the sponsoring health authority.

For one year following the MLPIMG, applicants participate in a mandatory Mentorship Program and have an assigned mentor who provides additional support and guidance. An assigned medical practice supervisor is responsible to review issues and provide monitoring reports to CPSM for the first three months of practice, and thereafter, as requested by the College throughout the time the physician holds Conditional Registration.

### **Path Three**

#### **Residency Training arranged through the Canadian Resident Matching Service**

CaRMS is a not-for-profit organization that works in cooperation with Canadian medical schools to provide an electronic application service and a computer match for entry into postgraduate medical training throughout Canada. The two-year Family Medicine residency program at the University of Manitoba offers four streams: urban, rural, bilingual (French/English) and Northern/Remote. Each year there are two iterations of residency matching. The first iteration is reserved for applicants who have graduated from Canadian medical programs. IMGs and Canadians trained abroad compete for residency spots against one another and those from Canadian programs in the second iteration only.

Minimum eligibility requirements:

- graduation from an acceptable medical school on the World Directory list
- Canadian citizenship or permanent residency
- written and passed the Medical Council of Canada Evaluating Exam (MCCEE)
- written and passed or be scheduled to write the National Assessment Collaboration (NAC) Examination
- proof of language proficiency – TOEFL iBT, with a total score of 96 and a score of 24 on each of the four sections. Academic IELTS with a minimum score of seven in each component with an overall band score of no less than seven
- meet the licensing requirements for registration with CPSM for postgraduate education

Although not required, priority may be given to those who have successfully completed the MCCQE Part I and MCCQE Part II.

Beginning in 2013, all IMGs who match to a residency program through CaRMS in Manitoba are required to sign a return of service agreement with the province. The length of service is two years, commensurate with the program length.

Upon acceptance into a residency program, IMGs apply for registration on the CPSM Educational Register. This process is the same for Canadian Medical Graduates. If on satisfactory completion of training the individual has not obtained the Licentiate of the Medical Council of Canada (LMCC) and certification through the College of Family Physicians of Canada (CFPC) required for Full Registration, the individual may apply for Conditional Registration.

### **Moving from Conditional to Full Registration**

There are time limitations to complete Full Registration. To obtain Full Registration, physicians who have completed Path One or Path Two must obtain the Licentiate of the Medical Council of Canada within five years of the date of Conditional Registration, and Certification from the College of Family Physicians of Canada within seven years of the date Conditional Registration was first issued.

Physicians who have completed Path Three must obtain the LMCC within five years of the date of Conditional Registration and certification from the College of Family Physicians of Canada within three years of the date of completion of the residency program or following three attempts at the certification examination whichever occurs first.

Physicians who have been issued Conditional Registration based on the CFPC Recognized Training and Certification outside Canada route must submit evidence of Certification and obtain the LMCC within five years of the date that Conditional Registration was first issued.

Physicians who are unsuccessful in the Medical Council of Canada examinations or the CFPC certification examination and who have been in practise in Manitoba for a minimum of two consecutive years are able to complete the Manitoba Practice Assessment Program.

### **Medical Council of Canada Examinations**

MCC Licentiate status, a requirement for Full Registration for IMGs, involves successfully passing three exams: the Evaluating Examination, the Qualifying Examination Part I and the Qualifying Examination Part II. These exams can be challenged at different times throughout the registration process and are described in Appendix I of this report.

### **Appeal Process**

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Decisions to deny registration or subject registration to condition may be appealed to CPSM Council. The appeal must be filed within 30 days of receiving notice of a decision, in writing, stating the reasons for the appeal. Unsatisfied appellants subsequently have the option of appealing to a court.

### **Time and Cost**

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The time and cost for IMGs to be licensed as a physician in Manitoba vary depending on the circumstance of the applicant and their pathway to registration. The process is long, involves numerous stakeholders with fees for Physiciansapply.ca, examinations, and registration and licensure.

Upon successful application, a CaRMS residency for family medicine takes two years to complete. The IMG programs take between four (PRA-FP) and 13 (MLPIMG) months to complete. All of these pathways commit IMGs to a return of service agreement. MCC's first step Evaluating and Qualifying Exams also take time to prepare, apply for and write. Many of the assessments and exams are fixed and can often lengthen timelines. Documentation is extensive and may take time to arrange.

The majority of the costs are directed toward examinations and national body certification – MCC and CFPC. IMGs receive a salary from their sponsoring health authority while completing a residency program arranged through CaRMS, the PRA-FP or the MLPIMG. A list of direct costs follows.

**Direct Costs (2017):****Physicians Apply**

Account Set-up Fee	\$280
Document Fee	\$160 per medical credential
Translation Fee	\$140 per page if document is in not in English or French

**Medical Council of Canada**

Application for Medical Registration	\$195
Self-Administered Exam (SAE) for MCCEE	\$71 – optional self assessment exam
SAE for MCCQE Part 1	\$71 – optional self assessment exam
MCCEE	\$1,780
MCCQE – Part 1	\$1,030
MCCQE – Part 2	\$2,470
	\$328 – administrative fee
NAC Examination	\$2,390

**Canadian Resident Matching Service**

R-1 Main Residency Match	\$328
Program application fee	\$30.50
Verification fee	\$110.25
Translation fees (if needed)	\$129-\$309 document dependant

**College of Physicians and Surgeons of Manitoba***Documentation Fees:*

Application for Medical Registration Review of Qualifications	\$210
Educational Register	\$330
Conditional Registration	\$600
less any fee paid for the Review of Qualifications	
Full Registration	\$210

*Educational Register Licence Fees:*

Resident Annual Licence	\$75
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*Registration Fees:*

Manitoba Medical Register	\$300
Educational Register	\$50



*Manitoba Medical Register Licence Fees:*

Full Annual Licence	\$1,780
Monthly Licence	\$300
Resident Annual licence	\$250
Resident Reduced Term Licence (less than eight months)	\$125

**College of Family Physicians of Canada**

Certification Examination in Family Medicine	\$2,902
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**Manitoba Practice Ready Assessment (MPAP) - Max Rady  
College of Medicine, University of Manitoba**

Administrative Fee	\$2,500
Assessment Fee	≥\$15,000 (varies)

**Professional Liability Coverage**

All licensed physicians must be members of the Canadian Medical Protective Association (CMPA), or carry a policy of professional liability insurance of at least ten million dollars. CMPA fees are based on the nature and location of a physician's practice. In 2017, these range from several hundred to several thousand dollars annually.

## State of Progress

The College of Physicians and Surgeons is committed to the fair assessment and recognition of international medical graduates (IMGs).

A complex system of licensure is in place for IMGs involving numerous assessments and exams conducted by a number of national medical authorities. CPSM's assessment of IMGs involves the review of an applicant's currency of practice, professional experience and clinical training. Third parties such as the Medical Council of Canada and the University of Manitoba are responsible to test, assess, and in some cases provide Canadian clinical experience for IMGs.

In Manitoba, the assessment process for family physicians is effective in that individuals are well vetted through exams and clinical training for qualification and competence.

For many IMGs, the opportunity for licensure as a family physician in Manitoba is long and difficult with a limited prospect for success. IMGs must complete several exams and assessments and acquire Canadian clinical experience by way of a CaRMS residency or a training/assessment opportunity through one of the streams of the University of Manitoba's IMG Program. Spots for a CaRMS residency and the IMG programs are competitive, with far more applicants than seats. That a person does well on their medical exams and assessments is no guarantee they can complete the licensure process.

Those from jurisdictions recognized as providing similar academic and residency training benefit from a more straightforward licensure pathway with a greater opportunity for success. Canadian clinical experience is not required and fewer exams are needed.

The current licensure process for IMGs works well for those from recognized jurisdictions and for those who are able to secure a residency through CaRMS or a spot in one of the streams of the University of Manitoba's IMG Program.

However, many highly qualified IMGs are not so fortunate. With no way to acquire Canadian residency experience, the years and expense of multiple medical exams and assessments to become a family physician, leads to a dead end.

Demand for family physicians in Manitoba is high, especially in rural and remote regions. For Manitoba to better capture the potential resource of family physicians IMGs represent, improvements to the current licensure process are needed. Most critically, we need CPSM to take a leadership role in the development of more licensure opportunities.

### *Recent Progress*

Since the 2013 OMFC registration review, the licensure process for IMGs has undergone some progress made by CPSM and the third parties involved. Most notably:

- CPSM now routinely assesses an IMG's post-graduate training upfront in the licensure process. This step helps avoid applicants undertaking numerous assessments and exams only to be told very late in the process that their post-graduate training does not qualify them for CPSM's conditional registration and so eligibility into one of the streams of the IMG Program at the University of Manitoba.
- CPSM participated in a 2014 IMG Program review that resulted in many recommendations to improve the University of Manitoba program. Qualified Manitoba IMGs are now given priority over out-of-province applicants and the program has committed to adopting a more efficient, synchronized application process between program streams.
- CPSM introduced a new application guide that provides IMGs more complete information about the assessment and registration process.

The Medical Council of Canada has also made recent improvements nationally that benefit Manitoba IMGs:

- 'Physiciansapply.ca', a new IMG application web portal was introduced. The new site provides an applicant friendly, first-step information resource and application portal for credential verification and exam applications.
- The Medical Council of Canada has indicated its intention to eliminate the Evaluating Exam by 2019. This change will result in a timelier and more cost-effective process for IMGs.

In addition, with support of medical regulators across Canada the National Assessment Collaboration (an alliance of Canadian organizations streamlining the evaluation process for IMGs seeking a licence to practise medicine in Canada) has developed a Practice Ready Assessment (PRA). This pan-Canadian model provides a set of common standards, tools and materials for PRA programs across the country. The approach is holistic with competencies in the areas of communication and leadership also evaluated. It is similar to what is currently used in the IMG programs in Manitoba. Once integrated, IMGs will receive continuous feedback on performance in a variety of settings. This type of formative assessment is commendable as it gives people a critical opportunity to adapt while demonstrating competence.

### *Substantive Progress Opportunity*

Substantive progress in this profession revolves around CPSM's leadership role working with relevant stakeholders to improve licensure opportunities for Manitoba's IMGs.

A few key opportunities for progress are listed below:

1. Qualified applicants can be denied opportunity for licensure due to limited access to residencies/training programs and as such there is a need to develop additional capacity and routes for qualified IMGs to receive family physician licensure opportunities in Manitoba.
2. CPSM's assessment of eligibility for conditional registration needs to be fairer. Currently Manitoba IMGs can be deemed ineligible for Conditional Registration by CPSM (and so ineligible for the University of Manitoba's IMG Program) as a result of post-clinical experience assessment and currency of practice assessment policies that potentially exclude well qualified IMGs from consideration.

In many regions of the world, residency training for doctors does not provide the same number of rotations or degree of training in the specific areas required by CPSM. IMGs that do not fully meet CPSM's specific residency training requirements but possess significant professional experience and are in fact qualified in the area in question should be given consideration.

IMGs often run out of currency of practice as they take time to study and complete licensure exams and assessments. Many are licensed and work as Clinical Assistants as they pursue registration. These activities relevant to currency of practice are not currently factored in CPSM's assessment, but should be.

3. CPSM's work with the OMFC to provide registration data for IMGs in the licensure process is important. With the number of pathways and third parties involved (e.g. Medical Council of Canada, the University of Manitoba, etc.), data collection is a challenge in this profession. We need an accurate, fact-based understating of the outcomes and timelines for IMGs seeking licensure in Manitoba.

## 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 CPSM'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)*

For applicants from jurisdictionally recognised programs the assessment and registration process is efficient. The pathway to Conditional Registration is straightforward and can be completed overseas. Different paths to Full Registration are possible once someone has been working in the field in Manitoba.

CPSM and other third party assessors have made efforts to ensure that the multiple steps in this assessment process are timely and efficient. For example, the introduction of Physiciansapply.ca by the Medical Council of Canada supports efficiency of the registration process through a document repository and management system. It improves access prior to immigration, allowing applicants to track documents, provides translation, reduces duplication of document requests by the various stakeholders in the registration process, and makes it easier for applicants to apply for exam sittings and see their results.

In February 2017, CPSM launched a new application process through the Medical Council of Canada, Physiciansapply.ca, whereby applicants have their post-graduate clinical training assessed earlier in the licensure process. Prior to the launch of this new process, applicants needing to complete a Canadian post-clinical assessment or training program as part of their licensure pathway did not routinely make an application for medical registration to CPSM until they were accepted into a program. This meant that applicants would complete national exams and go through extensive program application processes only to be told they were ineligible to proceed. Advising that this assessment be completed earlier in the licensing process saves IMGs who are deemed ineligible, the time and costs involved in completing national exams and making applications to Canadian post-clinical assessment and training programs to no avail.

In the 2013 Registration Review, the OMFC identified the MCC Evaluating Exam as a barrier to IMGs. The relevance and value of this high cost predictor exam for the MCCQE1 was questioned. This exam lengthens the time and increases the costs for candidates and has no value for the assessment of qualifications. At the time of the last review the OMFC suggested it would be more efficient and helpful to use this exam as a low-cost, optional online self assessment tool to provide IMGs with realistic information about their preparedness for the Qualifying Exam. We understand that MCC has received federal funding to develop an internationally delivered MCCQE1 as a replacement and intends to eliminate the Evaluating Exam as a mandatory requirement by the spring of 2019. This improves the efficiency of the process for IMGs.

Since the 2013 Registration Review, the University of Manitoba IMG Program has prioritised Manitoba resident applicants over applicants from other provinces when all requirements are met. This supports timelier entrance by Manitobans into highly competitive, Manitoba funded programming needed to meet requirements for licensure. In program years 2015 and 2016, 22 out of 45 Manitoba applicants were accepted into the MLPIMG. This compares to seven of 43 accepted in the two years preceding this policy change. And, of the seven Manitoba applicants to the PRA-FP in 2015 and 2016, two were accepted in comparison to zero of seven Manitoba applicants in the two preceding years (Max Rady College of Medicine, University of Manitoba).

As a result of a 2014 review of the IMG Program there were plans to further increase efficiencies by allowing IMGs applying to the PRA-FP to be considered for the MLPIMG without having to wait for the following program cycle or resubmit an application should they be unsuccessful.

Program information from the University of Manitoba does not appear to indicate that changes have occurred. The review also noted that the PRA-FP was to be offered as a Practice Ready Assessment program without fixed intake dates to offer more flexibility in filling specific vacancies. Program literature seems to continue to indicate a fixed start date. These adjustments are particularly critical in processes such as this where currency of practice requirements exist and there are numerous requirements of individuals.

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

The implementation of numerous changes since the 2013 OMFC review as outlined above, suggest that the assessment and registration process has been reviewed periodically to ensure timeliness for IMGs.

In addition, CPSM was involved in a review of the IMG Program at the University of Manitoba in 2014. Numerous recommendations came out of that review, several of which were aimed at improving timeliness of the process, particularly for Manitoba IMGs.

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

CPSM and the Medical Council of Canada have taken several steps to ensure timely, systematic communication with applicants.

Since the 2013 OMFC review, CPSM has developed an Application Guide for IMGs Applying for Family Practice. This guide is well organised and easy to follow with a step-by-step outline of the three potential pathways to licensure for applicants from non-jurisdictionally recognised programs. The guide details the fees involved and has a frequently asked question section that helps to clarify the process. It also provides information about access to records and appeals. The glossary of acronyms is particularly helpful given the number of stakeholders involved in the assessment of IMGs and numerous pathway options. This resource is a critical support to IMGs and will foster better planning and informed decision making.

Assessment result timelines are reasonable. Ensuring applicants' post-graduate clinical training is reviewed and an assessment result, including written reasons where a result is not favourable, is provided earlier in the process is an excellent example of CPSM's efforts to ensure timely communication with applicants.

The Physiciansapply.ca portal is also helpful in communicating with applicants, allowing individuals to track the status of their documents as they are submitted by third parties and to learn of exam results as they are released.

*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).*

Applicants from jurisdictionally recognised programs can begin to practice within a year of application. Their pathway to Conditional Registration is uncomplicated and can be undertaken overseas. Canadian post-clinical training is not required of these applicants. CPSM meets the one year timeliness standard for this group of qualified IMGs.

IMGs from jurisdictions that are not recognised have a much longer route to practice. Multiple examinations, intensive clinical assessments and interviews are required before they can begin to gain practice experience here in a Canadian post-clinical assessment or training program. Application for the IMG programs and the CaRMS residency matching process is highly competitive with limited capacity. In 2016, for example, there were 179 applicants for the MLPIMG from which 20 participants were selected (Max Rady College of Medicine, University of Manitoba). Securing requisite Canadian residencies is one of the biggest challenges faced by Manitoba's IMGs. Even for those who are successful in meeting all requirements for their chosen pathway it takes more than one year before they have an opportunity to practice.

Most concerning are the group of IMGs who may be otherwise qualified to practice but who cannot secure a CaRMS residency or IMG Program spot. For this group, there is no licensure opportunity as a family physician.

## Recognition of Professional Work Experience

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

There are numerous assessments of professional work experience. In their assessment of postgraduate clinical training, CPSM will consider family practice experience of applicants with only one year of training, provided they have three years of family practice experience in the five years immediately preceding the date CPSM receives application for Conditional Registration.

The National Assessment Collaboration Objective Structured Clinical Evaluation (NAC OSCE) provides IMGs the ability to demonstrate qualifications and skills acquired through professional work experience. The Clinician Assessment and Professional Enhancement (CAPE) program which includes a structured oral interview and a comprehensive clinical encounter also assesses the knowledge, skills and attitudes acquired by IMGs through professional work experience.

The PRA-FP allows for assessment of IMGs over a three-month period while they are working in medical facilities in rural Manitoba. The Manitoba Practice Ready Assessment Program (MPAP) is yet another assessment for qualifying IMGs that provides opportunity for demonstration of knowledge and abilities gained through professional practice. This summative assessment is another route to Full Registration with CPSM. These are all progressive practices.

Although the MLPIMG and CaRMS residency are training programs they do allow for assessment of IMGs while working. These programs allow for assessment over time and are likely to support a true consideration of an IMG's abilities.

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

Objective standards and criteria exist to assess knowledge and competencies acquired through work experience in all of the above assessment approaches (NAC OSCE, CAPE, PRA-FP, MPAP, MLPIMG and CaRMs).

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

For applicants from jurisdictionally recognised programs, where education and training is determined to be sufficiently similar to that which is provided in Canada, there are no mandatory Canadian work experience requirements.

For applicants from other jurisdictions, the MLPIMG and the residency match through CaRMs, are two pathways that consist of obtaining Canadian work experience. This requirement for Canadian work experience and assessment of individuals while in these programs appears warranted given the public safety issues at stake in this profession.



## 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).*

The three pathways to licensure for IMGs from non-recognised jurisdictions all include an opportunity for supervised practice and assessment. These opportunities range from four months to two years in length and include direct supervision and assessment. IMGs participating in either the University of Manitoba's MLPIMG or the residency match through CaRMs also receive a salary from sponsoring employers. These opportunities provide exposure to the practice of medicine in Canada and support success in licensure and workplace integration.

CPSM allows for Conditional Registration and the opportunity to practice once significant assessment is complete but before all exam requirements are met. This also supports success in licensure by providing opportunities for practice experience. Those completing one of the University of Manitoba's two IMG programs also receive mentorship supports after programs end. This is a commendable practice.

## Additional Fairness Concerns

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There is room for further improvement in the CPSM Application Guide for IMGs. We understand that for some applicants to the MLPIMG, the currency of practice has been the factor that has made them ineligible. The CPSM guide states that applicants to the program "must have worked as a licensed physician within the past five years" however, the University of Manitoba program information indicates that applicants must have a "minimum of 12 consecutive months of independent clinical practice as a General/Family Practitioner in the five years immediately preceding the application deadline". We have heard from physicians going to the cost of returning to their home countries to practice for one or several months, understanding this would be sufficient to maintain their currency, only to discover that their efforts were inadequate. Clarifying the currency of practice requirement stated in the Application Guide for IMGs applying to Pathway Two – MLPIMG – would reduce confusion, support better planning and save applicants from potentially profession ending mistakes.

CPSM's information could clarify the pathway for IMGs from programs that are jurisdictionally recognised. This pathway is not made clear on the CPSM website or their application guide and information on national body websites appears fragmented.

## Progress Opportunities

1. Explore the development of additional capacity and routes for qualified IMGs to receive licensure opportunities in Manitoba.
2. Fair consideration of the currency of practice qualification for IMGs, including some consideration of experience obtained through work in Canada as clinical assistants.
3. Updates to the Application Guide for IMGs Applying for Family Practice including:
  - a) information about the changes to the timing of the Application for Medical Registration
  - b) clarification of currency requirements for application to the IMG programs at the University of Manitoba
  - c) the pathway description for applicants from jurisdictionally recognized programs
4. Work with the OMFC to improve the collection/reporting of data on IMGs in the registration process including those aspects of the process managed by national third parties.

## Fairness Commissioner's Recommendation

To ensure compliance to The Fair Registration Practices in Regulated Professions Act, the Fairness Commissioner recommends that the College of Physicians and Surgeons take action regarding the above progress opportunities.

## College of Physicians and Surgeons of Manitoba – Action Plan

In response to the Fairness Commissioner’s recommendation, the College of Physicians and Surgeons proposed the following Action Plan as of April 2018.

CPSM’s Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 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. Explore the development of additional capacity and routes for qualified IMGs to receive licensure opportunities in Manitoba.</p>	<p>Capacity at the University of Manitoba is limited by the resources, including funding, available to the University. With respect to the possibility of self-funding the decision would rest with government.</p> <p>The need for additional capacity would also, in some respects, be dictated by the manpower needs set by Manitoba Health, Human Resource Planning. The Registrar sits on the International Medical Graduates Program Committee at which such issues are discussed. The College also has representatives on several Manitoba Health committees related to physician recruitment needs.</p> <p>However, the National Assessment Collaboration (NAC), a group of national and provincial organizations with a stake in the assessment of international medical graduates (IMGs), has created a pan-Canadian model for a Practice Ready Assessment in Family Practice (PRA-FP) with a set of common standards, tools and materials for practice-ready assessment (PRA) programs across the country. These materials have been developed in an effort to ensure that all PRA programs operate in a consistent and comparable manner across provinces and territories.</p>	

Progress Opportunity	Action(s)	Completion Date
	CPSM will accept a PRA-FP conducted in another jurisdiction in Canada thereby increasing licensure opportunity as the candidate will not have to undergo the Manitoba PRA-FP.	
2. Fair consideration of the currency of practice qualification for IMGs, including some consideration of experience obtained through work in Canada as clinical assistants.	The College cannot consider practice experience obtained as a clinical assistant, as the clinical assistant is not the most responsible physician in the clinical setting. In addition, many clinical assistants practice in a very defined scope of practice which does not lend itself to the primary care setting.	
<p>3. Updates to the Application Guide for IMGs Applying for Family Practice including:</p> <p>a) information about the changes to the timing of the Application for Medical Registration</p> <p>b) clarification of currency requirements for application to the IMG programs at the University of Manitoba</p> <p>c) the pathway description for applicants from jurisdictionally recognized programs</p>	<p>3(a) There have been no changes to the timing of the Application for Medical Registration (AMR). The College has been using the AMR since February 2017 for those first time applicants applying for either full or conditional registration. Applicants for conditional registration are encouraged to review the timelines for the international medical graduate programs on the University of Manitoba website prior to submitting an application. However, the CPSM will make individuals aware of the benefits of submitting an Application for Medical Registration early in the assessment process (i.e. before sitting national exams) and will review any application submitted in advance of the IMG program timelines.</p> <p>3(b) Emphasis will be placed on the currency of practice requirements specifically:</p> <p>a) those applying for the Practice Ready Assessment must have been in practice for three years in the preceding five years which is calculated from the date of application to the College.</p>	

Progress Opportunity	Action(s)	Completion Date
	<p>b) the University of Manitoba requires that those applying for the MLPIMG must have a minimum of 12 consecutive months of independent clinical practice in the five years immediately preceding the University of Manitoba application deadline.</p> <p>3(c) Applicants who have trained in the College of Family Physicians of Canada (CFPC) approved jurisdictions of training will be encouraged to contact the CFPC to determine eligibility under this route. A separate link to the CFPC website specific to this route has been added to the CPSM website.</p>	
<p>4. Work with the OMFC to improve the collection/reporting of data on IMGs in the registration process including those aspects of the process managed by national third parties.</p>	<p>We welcome the opportunity work with the OMFC in its data collection/reporting. However, as the College is currently undergoing a total revision of its database requirements, it is suggested that this be deferred until the project is complete. Discussions will include those aspects which involve third parties.</p>	

## Statement of Compliance

I am happy that CPSM will be working closely with the OMFC to improve data collection on IMGs. I also appreciate the effort they will make to clarify problematic items in their application guide.

Since the opportunity is available, IMGs will be encouraged to make their Application for Medical Registration (AMR) early in the registration process, prior to attempting MCC examinations, as a means of determining whether they will meet certain requirements for residency/IMG programming once exams are complete. This could also be a means of stressing deadlines for currency of practice for individuals. With the introduction of a common Practice Ready Assessment (PRA) in Family Practice across Canada, CPSM is now recognizing applicants who have taken this training outside of Manitoba – this is progressive practice.

I continue to be concerned about the lack of opportunities for competent IMGs in Manitoba. Medicine is the only profession in which one can meet all of the requirements and not license. I trust that CPSM will bring this issue to the table in relevant forums and my hope is that this situation will change.



Ximena Munoz  
Manitoba Fairness Commissioner

## Appendix I: Examinations and Assessments

### *MCC Evaluating Examination (MCCEE)*

The MCCEE assesses basic medical knowledge equivalent to that expected of a graduate of a Canadian medical school. It is a prerequisite for taking the Qualifying Examination Part I. The MCCEE is offered online from 500 sites in more than 80 countries. The fee for writing the exam is \$1,780.

### *MCC Qualifying Examination Part I (MCCQE Part I)*

The MCCQE Part I is a one-day, computer-based test that assesses the competence of candidates who have obtained their medical degree for entry into supervised clinical practice in postgraduate training programs. The fee for writing the exam is \$1,030.

### *MCC Qualifying Examination Part II (MCCQE Part II)*

The Medical Council of Canada Qualifying Examination Part II assesses the competence of candidates, specifically the knowledge, skills, and attitudes essential for medical licensure in Canada prior to entry into independent clinical practice. The exam consists of a series of five-minute and ten-minute clinical stations where candidates are required to perform clinical activities and judgements. The exam is offered twice a year in 11 Canadian cities in five provinces, but is currently not available in Manitoba. The fee for writing the exam is \$2,470.

### *National Assessment Collaboration Exam (NAC Exam)*

The NAC Examination is a one-day exam that assesses readiness to enter a Canadian residency program. It is a national, standardized examination that tests the knowledge, skills, and attitudes essential for entrance into postgraduate training in Canada.

It is an objective structured clinical examination (OSCE) that includes a series of stations where candidates are presented with typical clinical scenarios. It includes problems in: medicine, pediatrics, obstetrics, gynecology, psychiatry and surgery. The fee for this exam is \$2,390.

### *College of Family Physicians of Canada Exam*

The exam has a six hour written component consisting of computer-based short-answer management problems and an oral component consisting of five 15-minute simulated office oral exams. The exam is conducted twice a year – (spring and fall) – in multiple centres across Canada, in both official languages. Candidates are involved in testing over a period of two days.

### *Manitoba Practice Assessment Program*

MPAP involves extensive self-assessment, assessments by other physicians, inter-professional colleagues and patients. It is only available by referral from CPSM for: those physicians who are currently practising in Manitoba with a Conditional Registration; have at least two continuous years of active practice in Manitoba; have attempted either Part I and/or Part II of the MCC Qualifying Exams and/or have attempted to become certified by the CFPC.

The time to complete the assessment varies, with the majority of physician candidates completing the program within six months. The administrative fee for this program is \$2,500 and the assessment fee varies depending on the scope of the assessment required. For example, the minimum cost of an assessment for a family physician practising in Winnipeg is approximately \$15,000.





## Appendix II: 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</b>	<ul style="list-style-type: none"> <li>Fairness Standard, review focus and process presented</li> <li>Review schedule provided</li> </ul>	January 26, 2017 – via conference call
<b>Progress Report</b>	<ul style="list-style-type: none"> <li>CPSM 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>	July 6, 2017
<b>Progress Meeting</b>	<ul style="list-style-type: none"> <li>CPSM and Fairness Commissioner discuss report and possible actions CPSM is considering addressing progress opportunities</li> </ul>	July 26, 2017
<b>CPSM Action Plan</b>	<ul style="list-style-type: none"> <li>CPSM 's Action Plan submitted to OMFC</li> </ul>	September 27, 2017
<b>Action Plan Follow-up Meeting</b>	<ul style="list-style-type: none"> <li>CPSM and Fairness Commissioner discuss Action Plan and Review Report</li> <li>Revised Action Plan submitted to OMFC by CPSM</li> </ul>	March 19, 2018 April 23, 2018
<b>Registration Review Report</b>	<ul style="list-style-type: none"> <li>Report submitted to CPSM</li> <li>Report contains the review findings, CPSM 's Action Plan, and the Fairness Commissioner's Compliance Statement</li> <li>Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Active Living and Seniors and uploaded on OMFC website</li> </ul>	December 14, 2018

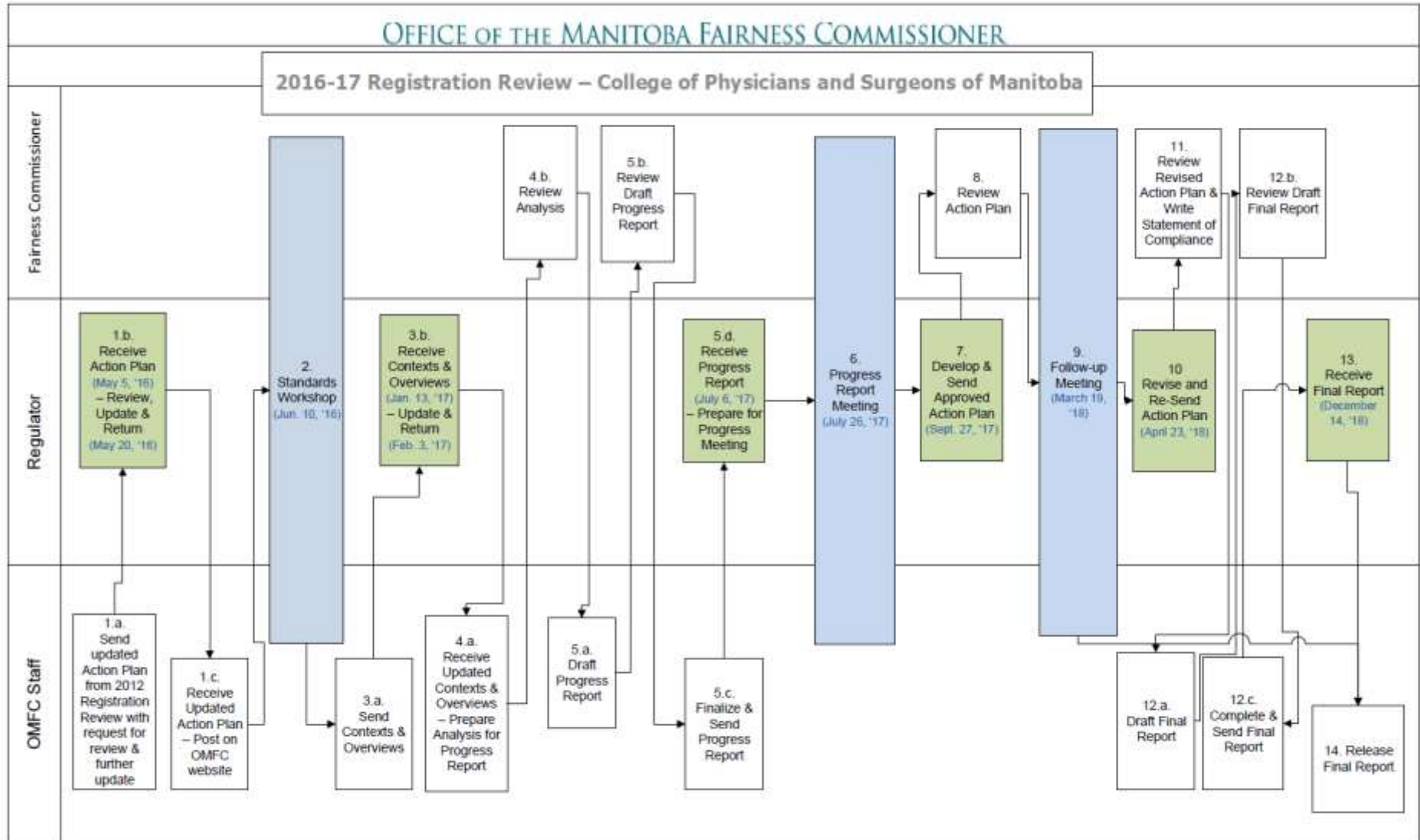
### Review participants:

Dr. Anna Ziomek, Registrar, CPSM  
 Maxine Miller, Director, Qualifications, CPSM  
 Jo-Ell Stevenson, Co-ordinator, Qualifications, CPSM



# OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

## 2016-17 Registration Review – College of Physicians and Surgeons of Manitoba







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