

2016 Registration Review Report

Manitoba Association of Optometrists



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Executive Summary

The Office of the Manitoba Fairness Commissioner (OMFC) 2016 Registration Review Report examines the Manitoba Association of Optometrists (MAO) state of progress with regard to the fair consideration of internationally educated optometrists (IEOs).

MAO has taken steps to improve its registration information for internationally educated optometrist applicants. The licensure process for IEO's with academic training from programs approved by the Accreditation Council on Optometric Education (ACOE) is costly, but timely with high success rates.

The licensure process for IEOs with academic training not accredited by ACOE underwent a significant transition in June, 2015 with the introduction of a national academic credential assessment by the Federation of Optometric Regulatory Authorities of Canada (FORAC) and the Internationally Graduated Optometrist Evaluating Examination (IGO Evaluating Exam) administered by Touchstone Institute.

The new FORAC credential assessment and IGO Evaluating Exam have positive features including a stronger, more meaningful assessment of IEOs qualification and a new, more direct licensure pathway for those that do well on the IGO Evaluating Exam. Cost and accessibility, however, may pose challenges for Manitoba IEOs.

The Fairness Commissioner identifies several progress opportunities: monitor new assessment process for its impact on IEOs; work to improve its time, cost and accessibility; further improve IEO registration information; work with FORAC to collect data for Manitoba IEOs engaging their process.

In response to the progress opportunities identified by the Fairness Commissioner, MAO has committed to:

- Continue to participate in FORAC and CEO meetings, but believes the new process is fair, timely and effective
- Add information to MAO's website about pre-migration steps and assessment results. Request Touchstone Institute post information about IGO Evaluating Exam dates and locations
- Approach FORAC about accessing assessment data on Manitoba IEO applicants and working on data collection and analysis

The Fairness Commissioner sees MAO's Action Plan as featuring some positive commitments, but remains concerned about cost and accessibility issues for IEOs that need to complete the new assessment process.

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 Manitoba Association of Optometrists (MAO) 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 MAO'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

Optometrists engage in the examination, diagnosis, treatment and prevention of diseases and disorders of the eye. They prescribe and fit eyeglasses and contact lenses and recommend therapies to correct vision problems.

In Manitoba, optometrists can diagnose eye disease, prescribe therapeutic pharmaceuticals, refer patients to an ophthalmologist, and provide continued management of eye disease.

This is the usual model of optometry practice in Canada and the United States, but differs from some other regions of the world where training in diagnosis and treatment of eye disease may not be as advanced.

There are two optometry programs in Canada, one at the University of Waterloo and the other at the University of Montreal.

As of November 2016, there are 165 optometrists registered to practise in Manitoba with 104 Canadian trained, 56 trained in the United States and five trained in other international jurisdictions. Many in this group of 61 internationally educated optometrists are Canadians that have gone abroad to study, often to the United States and then returned to Manitoba to practise.

There were 14 internationally educated optometrists who immigrated to Manitoba in the 2011 to 2015 period (Source: Immigration, Refugees and Citizenship Canada prepared by Manitoba Education and Training).

According to MAO, Manitoba is well-supplied with optometrists to meet the need of Manitoba patients in need of eye care. Across Canada, a number of provinces may have more optometrists in practise than are needed to serve the patient population.

Internationally educated optometrists contribute to the cultural diversity of the optometric community and increase the number of languages in which optometric care can be provided to Manitoba's multicultural population.

Overview of Assessment and Registration Process

The Manitoba Association of Optometrists (MAO) regulates the practice of optometry in Manitoba. MAO operates under the authority of *The Optometry Act* (C.C.S.M. c. O70) and Regulations (456/88 R and 118/2003). Only persons licensed and registered with MAO may practise optometry and use the title or professional designation 'Optometrist' in Manitoba.

Qualifications

There are two main qualifications for registration as an optometrist by MAO:

1. A Doctor of Optometry degree from a program accredited by the Accreditation Council on Optometric Education (ACOE). In Canada there are two accredited programs at the University of Waterloo and the University of Montreal. There are more than twenty accredited programs in the United States.
2. Passing the Canadian Assessment of Competence in Optometry (CEO Written Exam and OSCE) administered by Canadian Examiners in Optometry (CEO).

Individuals with academic training not accredited by ACOE must:

1. Complete a credential assessment through the Federation of Optometric Regulatory Authorities of Canada (FORAC).
2. Write the Internationally Graduated Optometrist IGO Evaluating Examination (IGO Evaluating Exam).
3. If necessary, complete bridge training at the International Optometric Bridging Program (Bridging Program) at the University of Waterloo in Ontario.
4. Pass the CEO Written Exam and OSCE.

Application and Assessment Process

There are two principal pathways to licensure for optometrists in Canada: those that have trained at ACOE accredited programs in Canada or the United States and those applicants with international academic programs not accredited by ACOE.

Applicants with ACOE accredited programs must first apply to CEO and successfully write the CEO Written Exam and OSCE and then apply to MAO for registration.

Internationally educated optometrists (IEO) with academic programs not accredited by ACOE must first undergo credential assessment, testing and possibly bridge training before being eligible to undertake the CEO Written Exam and OSCE and then apply for MAO registration.

The steps involved in the application and assessment process for IEOs with academic programs not accredited by ACOE are as follows:

Step 1 – Credential Assessment

Applicants first apply to the Federation of Optometric Regulatory Authorities of Canada (FORAC) for an assessment of academic credentials. This involves arranging a \$245 credential evaluation report from World Education Services (WES). WES requires the direct, third-party submission of academic credentials from the applicant's educational institution.

If the applicant's education program was not conducted in English, FORAC requires an English language proficiency test. A variety of language tests with specified language levels are accepted.

Upon completed application, the FORAC assessment will take up to two months and cost approximately \$1,000. This timeline does not include the time needed to complete a WES credential assessment or if necessary, English language testing or upgrading.

The FORAC credential assessment determines the applicant's eligibility to move on to the next step, writing the IGO Evaluating Exam.

Step 2 – Internationally Graduated Optometrist IGO Evaluating Examination

Applicants with favorable FORAC credential assessments next contact MAO (www.mb-opto.ca) to be referred to write the IGO Evaluating Exam.

The IGO Evaluating Exam is a two day, written and clinical, OSCE exam that assesses the applicant's current knowledge, skills and judgment related to Canadian optometry practice. It is administered by Touchstone Institute, taken in Toronto, offered at least once a year and costs \$5,000.

The results of the IGO Evaluating Exam determine if the applicant is eligible to proceed directly to the CEO Written Exam and OSCE *or* if the applicant is eligible to apply to the Bridging Program at the University of Waterloo.

Step 3 – International Optometric Bridging Program (if necessary)

The International Optometric Bridging Program (Bridging Program) is offered by the University of Waterloo in Ontario. Based on their IGO Evaluating Exam results, FORAC refers applicants to one of two bridging options.

More qualified applicants are referred to Bridging One, an accelerated four month program with an \$8,000 tuition fee. The other option is Bridging Two, a one year program with a \$32,500 tuition fee. Both programs include classroom lectures, clinical instruction, and internship rotations.

The Bridging Program is the only program in Canada offered in English and admission is competitive. Bridging One is offered once per year and admits a maximum of 36 students. Bridging Two is usually offered every second year and admits a maximum of 12 students.

Step 4 – Canadian Examiners in Optometry’s Written Examination and Objective Structured Clinical Exam

Applicants need to apply and successfully write the Canadian Examiners in Optometry’s Written Examination and Objective Structured Clinical Exam (CEO Written Exam and OSCE). Applicants complete a CEO application form and pay a \$5,900 exam fee.

The CEO Written Exam and OSCE consist of a one day written exam and an approximately 3 hour OSCE. It is held twice a year in spring and fall. The Written Exam portion is offered in Montreal (French) and in the Greater Toronto and Hamilton Area (English, Bilingual). The OSCE portion is offered in Hamilton.

Applicants receive written exam results within eight weeks of writing. Applicants who have passed will receive an additional “sealed” copy of their pass letter for submission to MAO for registration purposes. Applicants who have not passed will need to retake one or both parts of the exam to pursue licensure.

The CEO Written Exam and OSCE is new for 2017 and replaces the former national exam, the Canadian Assessment of Competence in Optometry exam. The new exam is shorter but costlier (\$5,900) – the old exam took five days, cost \$4,055 and was last offered in October 2016.

Step 5 – Registration with Manitoba Association of Optometrists

Upon successfully completing the CEO Written Exam and OSCE, the applicant must apply to MAO. This involves paying a \$400 application fee and providing:

- recent notarized photograph certifying proof of identity and current legal name
- evidence of optometric education, either:
 - a) original educational transcripts for those from ACOE accredited programs; or
 - b) the University of Waterloo’s IOBP Certificate; or
 - c) IGO Evaluating Exam results from Touchstone Institute
- original transcripts with respect to any degree program the applicant intends to include with his/her signature as an Optometrist (e.g., BSc)

- evidence of good standing in every other jurisdiction in which the applicant is or has been registered during the previous seven years
- Canadian criminal records check from every jurisdiction of residence in the past 5 years. For applicants with permanent resident status, a check is not required from the applicant's home jurisdiction for the period prior to receiving permanent residence status
- proof of ability to work in Canada
- CEO Written Exam and OSCE results
- proof of liability insurance

Applicants must also successfully complete MAO's Jurisprudence Examination. The exam consists of short answer, true or false, and multiple choice questions based on the Optometry Act, Optometry Regulation, and MAO By-Laws. The exam is one hour and may be written at the MAO office. Applicants may also have the exam proctored in another approved location.

Professional dues must be paid annually: \$3,500 full time/\$1,750 part-time.

Appeal Process

MAO has an appeal process in place for review of its registration decisions. Appeals are heard by MAO Council. Applicants must appeal in writing, stating the reasons why they feel the refusal was unwarranted.

Provisions for appeal are also in place for the FORAC Credential Assessment process (heard by the Canadian Optometric Evaluation Committee), and CEO Written Exam and OSCE (heard by Canadian Examiners in Optometry).

If an applicant believes their performance on the IGO Evaluating Exam was negatively impacted for some reason during the exam session, MAO can request that Touchstone Institute review information and reports from the exam session to determine if there is justification to request an additional rewrite of the IGO Evaluating Exam.

Time and Cost

The time required for registration as an optometrist varies significantly depending on the circumstances and qualifications of the applicant. North American trained applicants may require as little as three months to complete the process, passing the CEO Written Exam and OSCE and being registered by MAO. Direct costs (MAO application; CEO Written Exam and OSCE; MAO annual membership) will total approximately \$10,000.

International applicants trained outside Canada and the United States will require a longer period and face a costlier process. MAO estimates one to five years as a realistic time range.

Key variables impacting timelines and costs will revolve around the applicant's qualifications, English language proficiency, application timing and success on the IGO Evaluating Exam and CEO Written Exam and OSCE, as well as the need and availability of the Bridging Program. Direct costs, including registration fee, range from \$14,500 to \$47,500. Associated costs will also be involved for the travel and accommodations necessary with the out-of-province exams and a four or 12 month bridging program.

State of Progress

The Manitoba Association of Optometrists (MAO) is committed to the fair assessment and recognition of internationally educated optometrists.

Many aspects of MAO's registration practice for internationally educated optometrists (IEOs) are progressive and MAO has taken steps improving its practice since the 2013 Registration Review.

Applicants with permanent resident status are not required to provide criminal records checks from their home jurisdiction as these have already been conducted by the federal government.

In June 2016, MAO launched a new website with much improved registration information for IEOs. Improving registration information was one of MAO's Action Plan commitments from the 2013 registration review. The new website has many helpful, progressive features:

- registration information is up to date, clearly presented by step, and includes easy-to-use links to third parties
- timeline and cost information is presented, including realistic time and cost information broken down by licensure pathway
- appeal information, alternative documentation and financial support information is provided

MAO relies on several national third party bodies to conduct assessments and exams. Some of the strengths and progressive practices of these bodies include:

- the Canadian Examiners in Optometry's (CEO) National Competency Profile provides a well articulated set of standards and criteria that lays the groundwork for relevant assessment and informs the FORAC credential assessment, the IGO Evaluating Exam and CEO Written Exam and OSCE
- helpful information is provided about the format, content, assessment criteria for FORAC's credential assessment, Touchstone Institutes' IGO Evaluating Exam and CEO's CEO Written Exam and OSCE
- IEOs have an opportunity to demonstrate competence, skills and knowledge on the clinical, OSCE components of the IGO Evaluating Exam and the CEO Written Exam and OSCE
- appeal and review opportunities are in place for all of MAO's third party assessments
- the University of Waterloo's International Optometric Bridging Program (Bridging Program) consists of two programs, an accelerated and a longer, more intense option, that provide gap training and professional orientation for IEOs

The New Assessment Process

MAO's licensure process for IEOs underwent a major transition in June 2015 with the introduction of a national academic credential assessment by Federation of Optometric Regulatory Authorities of Canada (FORAC) and the Internationally Graduated Optometrist Evaluating Examination (IGO Evaluating Exam) administered by Touchstone Institute.

The FORAC credential assessment and IGO Evaluating Exam replaced MAOs former practice of referring all of its IEOs trained outside of the U.S. to be assessed by the University of Waterloo's International Optometric Bridging Program (Bridging Program). Formerly, the Bridging Program would conduct its own credential assessment and written and clinical test to determine if the applicant qualifies for bridge training. Now the FORAC credential assessment and IGO Evaluating Exam are used to determine eligibility to write the national CEO Written Exam and OSCE or whether bridge training is required.

Licensure opportunities for IEOs with MAO differ markedly depending on their country of education. For those trained in accredited academic programs in the U.S., the process involves out-of-province travel and a high cost CEO Written Exam and OSCE, but is also commendably timely, with high success rates. These applicants are trained in a similar model of optometry practice and are a good fit for licensure in Canada. For IEOs trained outside the U.S., the process is much longer, costlier and less accessible.

In the 2013 registration review with MAO, the Fairness Commissioner raised a concern about the challenges IEOs trained outside the U.S. face with the Bridging Program as their only pathway to licensure. The Bridging Program is not a viable option for many applicants as it is costly, located in Ontario, with competitive, limited capacity seating.

The new FORAC credential assessment and the IGO Evaluating Exam are products of considerable psychometric research and review by the Canadian Examiners in Optometry (CEO) together with the University of Waterloo's Bridging Program. CEO has also recently revised its CEO Written Exam and OSCE. Nationally, the Optometry profession has fine-tuned and evolved its assessments and exams.

This should mean more effective assessments for IEOs in the sense of more informed academic program comparisons and individual competency evaluation. It also opens up a new licensure pathway for IEOs. Those that do well on the FORAC credential assessment and IGO Evaluating Exam may not be required to take bridging and can proceed directly to the CEO Written Exam and OSCE.

Unfortunately, the new FORAC/IGO Evaluating Exam process represents greater challenges in terms of time, cost and accessibility for IEOs. The CEO Written Exam and OSCE fee will rise from \$4,055 to \$5,900 in 2017. Together the

FORAC/IGO Evaluating Exam cost \$6,000 and depending on demand, the IGO Evaluating Exam is offered at least once a year in Ontario. As currently structured, this new process may only benefit a small minority of IEOs assessed as not needing bridge training.

The need to improve licensure opportunities for MAO's IEO applicants trained outside of the U.S. is the most significant fair practice concern and progress opportunity raised in this report.

Fair Practice Analysis

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

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

Timely Registration

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

MAO's licensure process is well structured for Canadian and U.S. trained applicants. For this group, the process is both timely and results in high licensure rates. MAO's registration data in the 2011-2015 period indicates all 11 of its U.S. trained applicants received registration with an average time to registration of just over three months. These are excellent results.

However, IEOs with academic programs not accredited by the Accreditation Council on Optometric Education (ACOE) face a much less efficient, longer and costlier road. In the 2011-2015 period, MAO had few IEOs applicants in this group. Average time to registration for this group was just over two years. MAO has had no IEO applicants completing the new FORAC credential assessment or the Touchstone Institute IGO Evaluating Exam.

The introduction of a credential assessment and IGO Evaluating Exam in 2015 means the process carries \$6,000 of additional cost, requires more steps and another out-of-province trip for the IGO Evaluating Exam.

One potential benefit of the new process is that it allows IEOs who do well on the IGO Evaluating Exam to proceed directly to the national CEO Written Exam and OSCE without bridge training.

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

Significant review and psychometric activity has been undertaken at the national level to introduce the FORAC credential assessment and the IGO Evaluating Exam. The CEO Written Exam and OSCE has also recently undergone major review and revisions.

Given the impact on the time, cost and accessibility for IEOs applicants to MAO, the timeliness of the process deserves further review.

To improve timely, accessible licensure opportunities for IEOs trained outside of the U.S., MAO will need to consider alternative options and licensure pathways. An alternative could be to allow applicants with appropriate FORAC credential

assessments the option of proceeding directly to Bridging Program, waiving the need to undertake the IGO Evaluating Exam. Consideration could also be given to allowing those who successfully complete the Bridging Program a direct route to registration, waiving the CEO Written Exam and OSCE. It makes sense for MAO to explore in-province, professional orientation and gap training for IEOs.

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

Communication policies as they are outlined on the websites of the various national bodies and MAO appear reasonable. Assessment result formats and timelines are clear and phone numbers are provided to applicants to make inquiries.

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).

For U.S. trained applicants, MAO's licensure process easily meets the OMFC's one year timeliness standard. Depending on application timing relative to the fixed date, spring/fall national CEO Written Exam and OSCE, licensure can be accomplished in three to eight months. The majority of MAO's IEO applicants, 85% in the 2011-2015 period, were U.S. trained. All received some form of licensure in under a year. This is commendable.

For qualified IEOs trained outside of the U.S., those assessed without gaps or not needing bridge training, the one year timeliness standard could only be met for those with ideal application timing, resources and the ability to travel and stay out of province. With only one sitting offered annually for the IGO Evaluating Exam and two for the CEO Written Exam and OSCE, 12 to 24 months would be a more realistic time range for this group.

IEOs needing to complete the Bridging Program would take much longer to be licensed. Depending on the program and the applicant's ability to secure a seat, three to five years may be needed to complete the licensure process.

Recognition of Professional Work Experience

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

Professional work experience is assessed by way of the OSCE or clinical assessment component of the IGO Evaluating Exam and then with OSCE component of the CEO Written Exam and OSCE. This examination format allows people an opportunity to demonstrate what they have learned and can do concerning key tasks and competencies required for Canadian optometry practice. This is commendable.

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

The Canadian Examiners in Optometry's National Competency Profile provides a well articulated set of standards and criteria that support the development of the IGO Evaluating Exam and CEO Written Exam and OSCE.

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

MAO 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).

MAO does not provide any supervised practice opportunities for IEOs.

Providing opportunities for professional orientation and the ability to demonstrate competence and meet gaps under supervision could potentially support a timelier, more accessible licensure process for IEOs in Manitoba.

Additional Fairness Concerns

Applicants are provided clear, complete, accurate and easy to find information about:

- *the steps involved in the registration process*
- *what can be done to prepare for registration before migration*
- *key dates and timelines*
- *access to records information*
(Manitoba Fairness Standard: 1.1; 1.3; 1.10; 1.13)

MAO has done significant work improving its registration material subsequent to the 2013 registration review. A new MAO website was launched in June 2016 and is for the most part complete with many progressive features. We identify a few items that still need to be addressed:

- The documentation required upon initial application to MAO versus the documentation required to complete the application to MAO later, after the applicant has completed national assessments, exams and bridging, is not clear, nor is the application fee
- Information that helps IEOs prepare pre-migration, particularly regarding the need to arrange educational documents and syllabus would be helpful

- Exam schedule or date and location for Touchstone Institutes' IGO Evaluating Exam is currently not posted on the Touchstone Institutes' website
- Information regarding an applicant's access to records regarding their application and assessment documents needs to be provided

Progress Opportunities

The Fairness Commissioner sees the following opportunities for progress regarding the Manitoba Association of Optometrists' assessment and registration practice:

1. Monitoring and reviewing the FORAC credential assessment and Touchstone Institutes IGO Evaluating Exam for its impact on IEOs is needed to ensure the licensure process is timely, cost effective and accessible.
2. Where possible, improving the time, cost and accessibility of the licensure process for IEOs trained outside the U.S. will be critical for the success of this group of applicants.
3. Improving MAO's registration information concerning pre-migration steps, documentation requirements, initial application fee and documentation, access to records and Touchstone Institutes' IGO Evaluating Exam schedule and location would be helpful.
4. Work with FORAC to collect data for Manitoba IEOs engaging the FORAC credential assessment and IGO Evaluating Exam.

Fairness Commissioner's Recommendation

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

Manitoba Institute of Optometrists Action Plan

In response to the Fairness Commissioner’s recommendation, MAO proposed the following Action Plan as of December 1, 2016.

MAO’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. Monitoring and reviewing the FORAC credential assessment and Touchstone Institutes IGO Evaluating Exam for its impact on IEOs is needed to ensure the licensure process is timely, cost effective and accessible.</p>	<ul style="list-style-type: none"> • FORAC is made up of provincial optometry regulators, including MAO. MAO’s Registrar is on the FORAC Board and attends meetings at FORAC and CEO. • The credentialing process has recently undergone many changes and improvements. MAO believes that the new process is fair, timely and effective. The process is costly, however it is difficult to balance improvements in timeliness and testing methods with cost increases. The recent changes have added some complexity, but allow well-qualified applicants to move through the process faster. 	<p>Complete/ ongoing</p>
<p>2. Where possible, improving the time, cost and accessibility of the licensure process for IEOs trained outside the U.S. will be critical for the success of this group of applicants.</p>	<ul style="list-style-type: none"> • FORAC’s assessment process is quick, MAO’s application and registration process is quick. Delays may occur in the IGOEE, IOBP and/or CEO exam portions of the credentialing process, or due to residency issues. • The new process is an improvement in that IEOs who <i>do</i> have equivalent training can now bypass short bridging. Those who won’t get through the FORAC/IGOEE process to go straight to the national exam are those that <i>don’t</i> have equivalent training. We believe that the only way to “improve licensure opportunities” would be to lower standards. Given our responsibility to 	<p>N/A</p>

Progress Opportunity	Action(s)	Completion Date
	<p>protect the public, we believe the process is fair.</p> <ul style="list-style-type: none"> • OMFC’s definition of success (less than one year for all IEOs to be registered) is not realistic for a profession with the level of expertise of optometry. Particularly since optometry is defined very differently in different countries: in some countries, optometrists may now be performing laser surgery, while in others optometrists may be limited to prescribing eyewear. In Manitoba, optometrists can prescribe therapeutic pharmaceuticals and treat eye disease. MAO is responsible to ensure practicing optometrists have the skills and knowledge required by their scope of practice in Manitoba. • It is costly to administer advanced education programs and OSCE exams. This is reflected in the cost to North American optometry students and IEOs. • As a small province and a small profession, accessibility can be a concern for all Manitobans. In terms of opportunities to enter programs or write exams, available seats are directly related to the volume of applicants – a small profession can only support so many exam sittings and educational programs. • As a small province we are limited in our ability to provide local education, bridge training, and testing. No provincial optometry regulator provides this (with the possible exception of Quebec). As for all Manitoba residents, it’s necessary to go through the national channels for optometry in Canada. • There is not much more that MAO can do to reduce time, accessibility or costs. At this time however, MAO will continue to participate in FORAC and CEO (see 	

Progress Opportunity	Action(s)	Completion Date
	<p>#1), and MAO will work with FORAC to monitor the new process (see#4) and its impact on IEOs, particularly as the new process continues to unfold.</p>	
<p>3. Improving MAO’s registration information concerning pre-migration steps, documentation requirements, initial application fee and documentation, access to records and Touchstone Institutes’ IGO Evaluating Exam schedule and location would be helpful.</p>	<ul style="list-style-type: none"> • Add information on pre-migration steps to our website (English proficiency, documents to get ready, compare University of Waterloo program courses for education equivalency, contact FORAC to initiate process). • Add statement to our website: “You will receive results from all assessments. If you don’t, you should ask the institution. If you have not received results, you may contact MAO for guidance or contact information.” • Ask Touchstone to post IGOEE dates and location information on their website. 	<p>Immediate</p>
<p>4. Work with FORAC to collect data for Manitoba IEOs engaging the FORAC credential assessment and IGO Evaluating Exam.</p>	<ul style="list-style-type: none"> • Ask FORAC if we can access information on Manitoba applicants (if there is no privacy concern). • Ask FORAC if there are records of pass rates by country. • If MAO can access information, work on collecting data over time to report on concerns such as: how applicants perform depending on country of education; number of Manitoba applicants compared to immigrating optometrists as reported by Manitoba Immigration; success rate for Manitoba applicants. 	<p>Immediate</p> <p>Will take some time before there is any significant data (new process).</p>

MAO Comments
<ul style="list-style-type: none"> • Because optometry is defined differently in different countries, perceived success-rates of internationally educated applicants may be misleading. • Through our membership in FORAC and CEO, MAO is involved in the development of the national process for IEOs and for North American trained optometrists.

MAO Comments

- High tuition and testing costs as well as out-of-province travel are the reality for all Manitoba optometrists entering practice. Manitoba is a small province and optometry a small profession. All Manitoba optometrists must travel outside of Manitoba for optometric training and exams. All must pay the high cost for out-of-province or U.S. schooling and living expenses. OMFC has commended optometry's use of an OSCE as a fair assessment method; however, OSCEs are an expensive type of exam to design and administer.
- OMFC has stated that "It makes sense for MAO to explore in-province, professional orientation and gap training for IEOs." All Canadian optometry regulators rely on the national process for IEOs, as well as for Canadian-trained optometrists. MAO does not have the resources to develop or provide an in-province accreditation/gap training process for IEOs. MAO is not able to construct our own assessment processes, bridging, or examination protocols; the cost involved would be unreasonable and the resulting cost to applicants would be prohibitively expensive, far more expensive than the current national process.
- OMFC has suggested that we consider "waiving the national CEO Written Exam and OSCE" for IEOs who have completed the Bridging Program. The CEO Written Exam and OSCE is a national requirement for all optometrists.
- OMFC has suggested that MAO provide "opportunities for professional orientation and the ability to demonstrate competence and meet gaps under supervision [in order to] support a much timelier, more accessible licensure process for IEOs in Manitoba." MAO is not able to offer supervised practice opportunities as a method of credential assessment. Optometry is a healthcare profession requiring significant expertise and education. Evaluation through written exams, OSCEs and bridging programs is the standard to which health care professions are held. The potential risk to patients is too high for a minimalist qualification/orientation process.
- It is frequently noted by OMFC that the process for IEOs involves out-of-province travel and a high cost national exam. This is exactly the same for all Manitoba residents. Optometry is a small profession and there are no educational opportunities for optometry in Manitoba. While there is only one English language program for IEOs in Canada, there is also only one English language optometry degree program in Canada. All Manitobans that wish to become optometrists must take their Doctor of Optometry degree out-of-province. All Manitoba optometrists also must complete the national optometry exam in Ontario (or Quebec, in French) regardless of whether they completed their education in Ontario, Illinois, Arizona, or any other ACOE optometry school.

Statement of Compliance

Some aspects of the Manitoba Association of Optometrists' Action Plan represent a positive response to the progress opportunities identified in this review. These actions will improve fair practice for the assessment and registration of internationally educated optometrists (IEOs) and are consistent with the intent of *The Fair Registration Practices in Regulated Professions Act*.

While am I pleased MAO will continue work on its registration information and explore the possibility of collecting data with FORAC, the cost and accessibility of the licensure process for IEOs with the newly established national assessment process remains a concern.

MAO's monitoring of the impact and challenges of the new process on Manitoba IEOs will be a key focus of our engagement moving forward.



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

The Manitoba Association of Optometrists (MAO) reports annually to OMFC on the registration of internationally educated optometrists (IEOs) to Manitoba.

MAO received 44 applications from 2011 to 2015. Among these applications, 38% or 17 were from internationally educated applicants. 16 of these 17 IEOs obtained full registration in this period.

IEO applicants received education from 3 different countries. Predominantly, the top country of education was the United States, comprising 82% of internationally educated applicants.

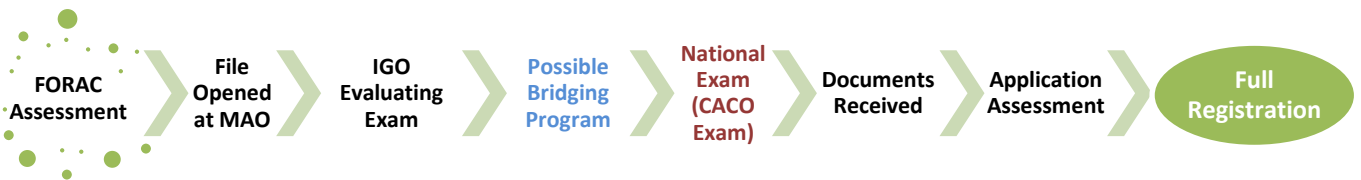
Many internationally educate optometrists come to Manitoba and pursue licensure as an optician as an alternate career.

Based on academic qualifications, all applicants go through one of two pathways below to become registered optometrists by MAO.

- a. Those who graduated from an accredited program



- b. Those who graduated from an academic programs not accredited by ACOE



The average time to full registration from application assessment by MAO was 39 days or just over a month. This 39 day average does not include the time taken by applicants to successfully complete the national exam or possible bridge training, both of which precede MAO application.

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

For additional context, there were 14 immigrant landings for optometrists to Manitoba from 2011 to 2015. The NOC code associated with these landings is 3121 Optometrists.

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"> MAO 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 18, 2016
Progress Meeting	<ul style="list-style-type: none"> MAO and Fairness Commissioner discuss report and possible actions MAO is considering addressing progress opportunities 	November 8, 2016
MAO Action Plan	<ul style="list-style-type: none"> MAO's Action Plan submitted to OMFC 	December 1, 2016
2016 Registration Review Report	<ul style="list-style-type: none"> Report submitted to MAO Report contains the review findings, MAO's Action Plan, and the Fairness Commissioner's Compliance Statement 	December 14, 2016
Registration Review Closeout Meeting	<ul style="list-style-type: none"> MAO and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions & how MAO'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

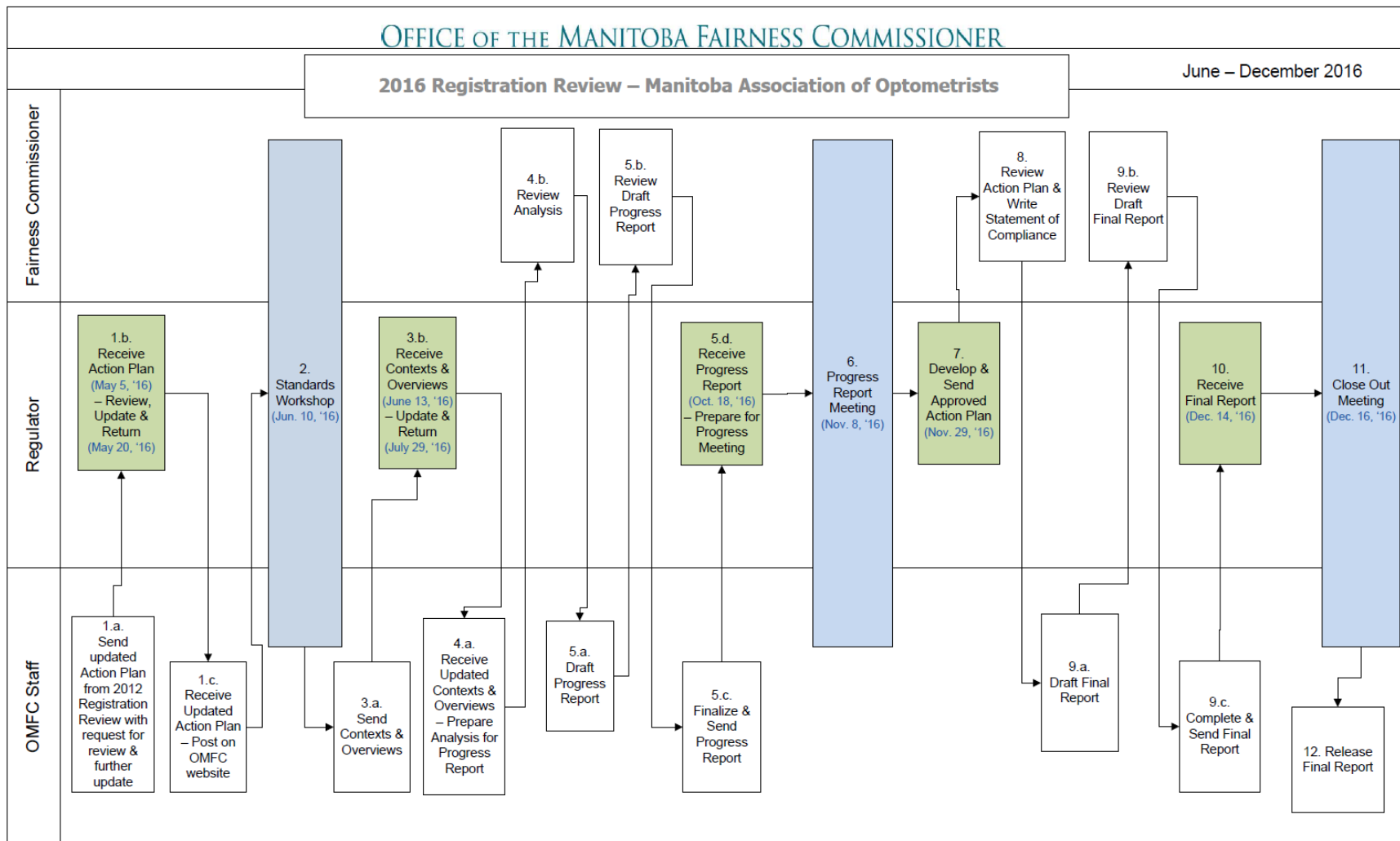
MAO Review participants:

Laureen Goodridge, MAO Executive Director
Wynne Haaksma, MAO Administrative Assistant
Dr. Lorne Ryall, MAO Registrar

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

2016 Registration Review – Manitoba Association of Optometrists

June – December 2016





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