

2016 Registration Review Report Manitoba Dental Association



OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

Table of Contents

Executive Summary	1
Introduction	2
Context of the Profession in Manitoba	3
Overview of Assessment and Registration Process	4
State of Progress	11
Fair Practice Analysis.....	12
Progress Opportunities	15
Fairness Commissioner’s Recommendation	15
Manitoba Dental Association Action Plan.....	16
Statement of Compliance	18
Appendix I: 2011-2015 Registration Data	19
Appendix II: 2016 Registration Review Process	21

Executive Summary

This Registration Review Report consists of the Manitoba Fairness Commissioner review of progress by the Manitoba Dental Association (MDA) on the fair consideration of individuals applying for registration, focusing on applicants educated outside of Canada. The analysis is based on the Office of the Manitoba Fairness Commissioner's (OMFC) registration review including a fair practice analysis, identification of progress opportunities, and confirmation of actions to progress in fair registration practice.

The Fairness Commissioner has identified opportunities to achieve timely and effective registration through recognition of professional work experience and opportunities for supervised practice.

The MDA has been working with the National Dental Examining Board of Canada (NDEB) to streamline their application process and to ensure there is no duplication in their documentation requests, reducing costs for applicants and improving timeliness of registration. Since our last review, the MDA has also engaged with the NDEB to increase opportunities for IEDs to access required exams. As a result, exams are now offered with greater frequency and application windows have increased.

Following this review, the Manitoba Dental Association will continue to work with key stakeholders towards the implementation of approaches that support success of internationally educated dentists (IEDs) in Manitoba, including the introduction of preparation resources for those undertaking the Equivalency Process. They have committed to engaging with the OMFC and the NDEB to increase our understanding of the experience of Manitoba IEDs with the first stage of the assessment process. They have also proposed actions that may lead to increased access to the International Dentist Degree Program for Manitoba IEDs.

Our hope is that these planned actions with MDA's national third party and other key stakeholders in Manitoba will support the ongoing evolution of progressive fair registration practice in the profession of dentistry.

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 drawn to the need for the fair consideration of individuals applying for registration, focusing on applicants educated outside of Canada, 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, MDA'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 MDA's activities to improve practice to date and practices regarding the three critical areas.

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

Context of the Profession in Manitoba

Dentistry

Dentists are primary care providers for patient oral health. They are responsible for the diagnosis, treatment, management and overall coordination of services to meet oral health needs. Common treatment activities include preventative, restorative and surgical care. Dental specialists are practitioners with training at a graduate level in a recognised area of dentistry providing additional expertise in the diagnosis and management of certain oral health conditions.

In Manitoba, a number of practitioners are internationally educated. This culturally diverse group of practitioners helps serve Manitoba's increasingly diverse population. A quarter of the seats at the University of Manitoba's College of Dentistry are set aside for Internationally Educated Dentists (IEDs) in its International Dental Degree Program.

In addition to their contribution in the field, the Manitoba Dental Association (MDA) reports that IEDs also play an important role filling academic faculty positions supporting a vibrant dental training program at the College of Dentistry at the University of Manitoba.

Demand for dental services in the province is strong, especially in northern communities. In response to improve access to care in underserved areas, the MDA implemented a mentorship program to increase awareness of opportunities in rural and remote areas of the Province by recent graduates. The program is successful and has improved access to dental services in many rural communities. Remote communities still remain a challenge.

Landings data indicates that 78 internationally educated dentists arrived in Manitoba between 2011-2015 (Source: Immigration, Refugees and Citizenship Canada prepared by Manitoba Education and Training).

Dental Assisting

Dental assistants provide important services and support in oral health care. Most dental assistants work alongside dentists in dental clinics. They perform many tasks requiring both interpersonal and technical skills including the promotion of oral health.

A number of internationally educated oral health care providers are registered as dental assistants in the Province. Landings data indicates that 49 internationally educated dental assistants arrived in Manitoba between 2011-2015 (Source: Immigration, Refugees and Citizenship Canada prepared by Manitoba Education and Training).

Dental assistants are self-regulated and registered as associate members of the MDA. In Manitoba, all dental assistants using the title of Registered Dental Assistant must be licensed with the MDA.

Overview of Assessment and Registration Process

The Manitoba Dental Association (MDA) operates under the authority of *The Dental Association Act* (C.C.S.M. c. D30) and the Manitoba Dental Association By-Laws. *The Dental Association Act* requires individuals practising dentistry, a dental specialty or as a dental assistant and using the respective titles of Dentist, Dental Specialist or Registered Dental Assistant to be registered with the MDA.

Qualification

General Dentist

Principal qualifications required for registration as a general dentist include graduation from a dental training program and certification from the National Dental Examining Board of Canada (NDEB) demonstrating successful completion of their Written and Objective Structured Clinical Examinations (National Exam and OSCE).

Graduates of programs accredited by the Commission on Dental Accreditation of Canada (CDAC) or programs accredited by organizations in which CDAC has reciprocal recognition agreements are eligible to apply for the NDEB National Exam and OSCE. CDAC has reciprocal agreements with national accrediting bodies in the United States, New Zealand, Ireland and Australia.

In order for graduates of non-accredited dental training programs to apply for the NDEB National Exam and OSCE, they must first successfully complete a recognised assessment process. The individual must successfully complete the NDEB Equivalency Process, a dental degree completion program at an accredited Canadian university or an accredited dental training program.

A prerequisite for application to a Canadian dental degree completion program is completion of the NDEB Assessment of Fundamental Knowledge (AFK).

Dental Specialist

Principal qualifications required for registration as a dental specialist include graduation from a dental specialty training program and successful completion of the National Dental Specialty Examination (NDSE) administered by the Royal College of Dentists of Canada (RCDC).

Graduates of programs accredited by CDAC or programs accredited by organizations in which CDAC has reciprocal recognition agreements are eligible to apply for the NDSE. CDAC has a reciprocal agreement for dental specialty training programs with the national accrediting body in the United States.

In order for graduates of non-accredited dental specialty training programs to apply for the NDSE, they must first successfully complete a recognised assessment process. The individual must successfully complete a Dental Specialist Assessment and Training program (DSATP) at an accredited dental

specialty training program or an accredited dental specialty training program. A prerequisite for application to a DSATP is the NDEB Dental Specialty Core Knowledge Exam.

Dental Assistant

Principal qualifications required for registration as a dental assistant include graduation from an appropriate allied dental health care training program and a certificate from the National Dental Assisting Examining Board of Canada (NDAEB) demonstrating successful completion of their written examination.

Graduates of programs accredited by CDAC or programs accredited by organizations in which CDAC has reciprocal recognition agreements are eligible to apply for the written examination. CDAC has reciprocal agreements with national accrediting bodies in the United States.

In order for graduates of non-accredited allied dental healthcare training programs to apply for NDAEB certification, they must first demonstrate their formal education including training in certain mandatory skills. Once demonstrated, the applicant must successfully complete the written examination and a Clinical Practice Evaluation (CPE) in order to receive the NDAEB certificate.

Application and Assessment Process – General Dentists

Although the MDA is responsible for licensing general dentists, dental specialists, and dental assistants, the focus of this Progress Report is on registration practices for the general dentist. Details of the application and assessment process provided below are outlined for this profession only. OMFC will work with the MDA to better understand the experience of internationally educated dental specialists and dental assistants as part of our future work together on fair registration practices.

Assessment and registration is a two step process: first being assessed and certified by the National Dental Examining Board of Canada (NDEB) and then applying and registering with the MDA.

1. National Dental Examining Board of Canada Certification

Applicants first apply to the NDEB online, supplying name of the dental program they completed, the date of completion, contact information and photo identification. The application fee for the National Exam and OSCE is \$500. The application fee for the Equivalency Process is \$950.

Graduates of Accredited Dental Degree Programs

Graduates of accredited programs, proceed to write the NDEB National Exam and OSCE. The written exam occurs in one day and consists of a morning and afternoon session each with 150 multiple choice questions. The written exam fee is \$900. The OSCE examination also takes one full day to complete and

consists of simulated case stations of five minutes duration each. The OSCE fee is \$900.

The National Exam and OSCE are conducted at Canadian dentistry faculties and offered three times annually in March, May and November. In May and November undertakings are offered at several exam locations provided there is a minimum of 25 participants at a location. If less than 25 candidates register at a centre, candidates may be transferred to another centre.

The NDEB establishes National and OSCE Examination centres outside of Canada. These identified locations must have acceptable security with a minimum of 50 candidates. The National Exam and OSCE fees for centres outside of North America are \$1,100 each.

The NDEB supplies preparation material for both exams. In addition to releasing all the written examination questions on its website, the NDEB provides the Examination Blueprint for the written exam and the Question and Answer Framework for the OSCE.

A candidate has a maximum of three attempts each to successfully complete the National Examination or OSCE. Applicants are informed within 3 to 6 weeks of their exam results. Successful applicants receive NDEB certification and can proceed to apply to the MDA.

Graduates of Non-Accredited Dental Degree Programs

To be eligible to write the National Exam and OSCE, graduates of non-accredited academic programs must successfully complete one of the following three pathways: the NDEB Equivalency Process, a degree completion program at an accredited dental training program or an accredited dental training program.

NDEB Equivalency Process

The Equivalency Process is comprised of three assessments (Assessment of Fundamental Knowledge, Assessment of Clinical Judgement, Assessment of Clinical Skills) intended to evaluate and confirm the substantive equivalence of the individual's dental knowledge and skills to that of a graduate of an accredited Canadian dentistry program.

The Equivalency Process is open to anyone that has completed a dental training program. The entire process can be completed outside of Canada and before a person immigrates. There are no residency requirements to be eligible to apply for or to undertake the Equivalency Process.

The Assessment of Fundamental Knowledge (AFK) is a full day, multiple choice assessment that tests for basic and universal dentistry knowledge. The assessment fee is \$800 and it is offered in February and August of each year. A test equated passing score of 75 or higher is required to be eligible to register for the Assessment of Clinical Skills (ACS) and the Assessment of Clinical Judgment (ACJ). Each of the exams in the Equivalency Process can be taken three times. Applicants have up to five years to successfully complete the Equivalency Process and extensions are possible at the discretion of the NDEB.

The Assessment of Clinical Skills is a two-day evaluation of technical dental procedures conducted on simulated patients (mannequins) in a clinical setting. The fee is \$5,500 and the assessment is offered in June and December of each year.

The Assessment of Clinical Judgement is a full day written assessment that tests the diagnostic, interpretive and clinical decision making ability of applicants. The fee is \$1,500 and the assessment is offered the day following the ACS in June and December of each year.

Successful completion of the three assessments allows individuals to apply to take the NDEB National and OSCE Examinations.

The NDEB supplies preparation material for all three of the Equivalency Process assessments in the form of assessment protocols. Applicants are responsible to supply their own dental supplies and equipment for the ACS. These supplies and equipment are at the discretion of the applicant for the procedures identified. They are commonly available to anyone who practises dentistry. This can cost approximately \$5,000.

Dental Degree Completion Programs

Another option to qualify for the National Exam and OSCE is to complete a two-year degree completion program offered at many accredited dental training programs including the University of Manitoba's College of Dentistry.

The NDEB Assessment of Fundamental Knowledge is a prerequisite to apply for admission to a dental degree completion program.

Students are provided professional orientation and complete the final two years of the regular four-year dental program.

Costs vary by training program, but may be in excess of \$100,000 for some programs when all associated costs are considered. Currently, the program at the University of Manitoba costs \$136,000. Entry is competitive with a limited number of spots available. Currently, the University of Manitoba's College of Dentistry reserves an average of seven spots for the International Dentist Degree Program (IDDP) in an overall class size of thirty-five. International Dental Degree candidates compose on average 20-25% of each graduating class.

2. MDA Application and Registration

Individuals apply to the MDA after completing the NDEB certification process. Current cardiopulmonary resuscitation certification is required as well as attendance at a regulatory overview session held at the MDA. Applicants who have not completed an approved course in Canadian jurisprudence (which would include Equivalency Process applicants) must also complete an approved ethics and jurisprudence in dentistry course. This is offered by the MDA, various provincial dental regulators or at several Canadian dental training programs including the University of Manitoba.

Applicants to the MDA complete an application form, paying a \$200 registration fee and supplying the following documents:

- An original letter from the Dean or designate of training program and a certified photocopy of their degree certifying graduation from a dental training program
- A certified copy of NDEB certificate
- If licensed in another jurisdiction, an original Letter of Good Standing or Certificate of Standing from the previous licensing body(ies)
- Two original Letters of Reference from non-family members
- Proof of professional liability insurance (approximately \$1,700)
- A copy of Cardiopulmonary Resuscitation Program certificate
- Payment of \$3,250 annual licensure fee (prorated after September to \$2,250)

After receiving a complete application, the MDA notifies applicants usually within a day or two of its registration decision.

Appeal Process

In accordance with *The Dental Association Act*, MDA registration decisions are subject to appeal. Appeals are heard by the MDA Board of Directors independent of the original decision makers. No fees are involved with an appeal. Applicants are advised of their right of appeal in writing with any registration decision that places restrictions, conditions or denies their application or ability to practice dentistry within the parameters of their licensure category.

Time and Cost

Time and costs for IEDs to complete the registration process vary according to the circumstance of the individual.

International graduates of accredited programs (United States, New Zealand, Ireland and Australia) face a fairly straightforward process, identical to graduates of domestic accredited programs, that will take 6 to 12 months and cost approximately \$6,000 for application, exams and registration. Significant delays and costs will be incurred if exam rewrites or re-takes are required and there likely will be associated costs preparing for exams, and acquiring malpractice insurance.

International graduates of non-accredited programs that pursue the Equivalency Process will at a minimum require 11 months, but many take 2 to 3 years, to complete the entire assessment and registration process that will cost an additional \$8,800 or \$13,800 in total direct costs. Overall success in the first

attempt at the Equivalency Process assessments is low and re-writes/retakes are common. Assessment rewrites/retakes have additional costs.

There are significant associated costs for applicants in the Equivalency Process. Like most individuals in accredited dental training or IDD programs, individuals are responsible to provide their own dental equipment. In the Equivalency Process, the equipment and supplies for the ACS and preparation courses for the assessments are expensive and are essential for many to be successful. For most individuals, the purchase of brand new equipment and supplies is difficult. However, it is possible to rent, borrow, share or purchase used equipment and supplies.

Time and cost will be required for Equivalency Process applicants completing an approved ethics and jurisprudence course. The costs are nominal and the course can be completed online.

International graduates of non-accredited programs that successfully enrol in a completion program will need two years for the program and will usually require 3 to 4 years in total. Costs for completion programs vary by dental training program, but may exceed \$100,000. Those graduating from completion programs rarely require rewrites for the National Exam and OSCE.

The list of fees includes:

- NDEB Application Fee \$500 National Exam and OSCE
\$950 Equivalency Process
- National Written Exam \$900
- National OSCE \$900
- Assessment of Fundamental Knowledge \$800
- Assessment of Clinical Skills \$5,500
- Assessment of Clinical Judgement \$1,500
- International Dentist Degree Program (University of Manitoba) Approximate 2016 fees: \$136,000*
*excluding textbooks and other compulsory fees assessed to all UofM students (as below).

Estimate includes:

- \$90 Application fee
- \$1,300 On-site Assessment (IDDP **Track A** participants only)

Mandatory Summer Orientation Program:

- \$5,000 Summer Term before First Year of IDDP
 - \$50,763 First year tuition
 - \$26,583 Clinical Instrument Fees
 - \$209 Clinical Consumables

 - \$46,148 Second Year Tuition
 - \$5,645 Clinical Instrument Fees
 - \$209 Clinical Consumables
- MDA Registration Fee \$200
 - MDA Licensure Fee \$3,250
 - Malpractice Insurance Fee \$1,700 (approximately)

State of Progress

The Manitoba Dental Association is committed to the fair assessment and recognition of internationally educated dentists.

Many aspects of MDA's registration practice for internationally educated dentists are progressive and MDA has taken steps to improve its practice since the 2013 Registration Review. They have:

- redesigned the registration aspects of their website and revised their application form to clarify documentation requirements by registration category
- updated their web based information to ensure their timeline information is accurate, adding timeline information for appeals
- introduced a formal process for interviewing new applicants to support the review and improvement of their online resources
- supported and participated in the development of a resource guide and pathway summary for internationally educated dentists and posted these documents on their website to make them accessible by IEDs
- initiated discussions with the NDEB regarding:
 - a process to objectively review the options, requirements, costs, benefits and risks for assessments and examinations that allow for partial credit
 - streamlining registration processes by eliminating duplicate requests for documents from applicants
 - how to improve access by applicants to information about alternative documentation options. As a result, information has been developed and has been included on the NDEB website
 - options to provide more objective feedback of results for the AFK, ACJ, written and OSCE examinations
 - options for increasing opportunities to conduct the Assessment of Clinical Skills (ACS) and Assessment of Clinical Judgement (AJC). As a result, annual offerings of these exams as well as the AFK have increased, in turn increasing capacity of the process to evaluate more applicants in a given year. The NDEB now accepts applications for the ACS throughout the year rather than during a narrow window of time, as was the case prior to this change
- requested a further review of appeal procedures by the Royal College of Dentists of Canada to ensure transparency, objectivity, and fairness in the examination process

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 MDA's state of progress concerning these key fairness issues:

Timely Registration

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

Success rates of IEDs from non-accredited programs completing dental degree completion programs in Canada are high. There are currently eight dental degree completion programs, including the one in Manitoba, to which Manitoba resident IEDs can apply. 20-25% of the seats in the University of Manitoba's dental degree program are dedicated to IDDP participants; an average of seven seats annually. Capacity of these programs does not meet demand. Application processes are rigorous and competition is significant. It is fair to say that only the most highly qualified IEDs are granted seats each year.

Consideration to providing the most highly qualified IEDs with a shorter program that also provides exposure to the practice of dentistry in Canada thereby freeing up space in current IDDPs for IEDs in greater need of retraining to address gaps and support success in licensure may be needed.

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

The MDA is working with the NDEB to streamline its application process and reduce any duplicate requests between the two organizations.

Offerings of Equivalency Process examinations have increased and application opportunities for these exams have been expanded. The AFK, the ACJ and the ACS are each offered two times per year. All assessments are offered outside of Canada on a regular basis.

The NDEB performs assessments at any secure international location where candidate numbers are sufficient.

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

The MDA does excellent work finalizing the last steps in the registration process once an applicant has been certified by the NDEB. The average time to full registration, once a complete application is received, is just nine days.

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).

It is possible for internationally educated graduates from accredited dental degree programs to complete the certification exams and license with the MDA within one year. Certification examinations are available outside of Canada and are provided three times a year.

Timeframes are longer for internationally educated dentists from non-accredited programs.

Degree completion programs are typically two years in length. The IDDP in Manitoba takes applications a full year in advance of programming. Capacity does not meet demand and the application process is highly competitive. With the application to the NDEB, plus the time involved in taking the AFK, gaining acceptance into the IDDP, writing the certification exams and applying to the MDA, successful individuals in the degree completion route are realistically looking at a minimum of 3-4 years before licensure.

With the frequency of offerings of exams in the Equivalency Process, it is possible for IEDs choosing this pathway to complete the registration process within one year provided they pass all exams on their first sitting. Lack of preparatory resources may negatively impact pass rates of some applicants adding time for rewrites and extending timeframes beyond this one year standard.

Recognition of Professional Work Experience

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

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

The OSCE examination required as one of two certification exams by the NDEB, and the ACS required in the Equivalency Process allow individuals to demonstrate skills acquired through professional education and work. This is progressive practice.

Professional work experience is not assessed for the purpose of waiving or reducing elements of the NDEB required processes.

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

There is no requirement for Canadian work experience in this registration process.

Supervised Practice Opportunities

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

Supervised practice opportunities are not currently available in this profession. In dentistry, supervised practice is difficult to implement. The private business model of dentistry practice together with public safety concerns and the high levels of expertise required pose significant challenges.

Additional Fairness Concerns

Required qualifications are relevant and necessary for competent professional practice (Manitoba Fairness Standard, 3.).

Documentation requirements are reasonable: difficult-to-provide documents are warranted (Manitoba Fairness Standard, 4.1).

We note that upon application, the MDA asks for an original letter from the Dean of each applicant's dental training program confirming successful completion of the dental program. Information for applicants regarding the relevance and necessity of this requirement is needed.

Applicants are provided clear, complete, accurate and easy to find information about: qualification requirements, 1.4).

The MDA provides a recommended benchmark level for success in licensing and in work, which is a commendable practice. Although, messaging regarding language proficiency in MDA's new profession specific resource guide is very clear, further clarification of other messages on their website around language proficiency is needed.

The NDEB website overall contains excellent information and is very well organized and written. One small aspect of online navigation, however, may be confusing. In the information for graduates of non-accredited programs, it is not clear that once they meet the standard they apply to complete the certification exams as a graduate of an accredited program. To find information on the certification process, i.e.: the written exam and OSCE, they must go to the tab for graduates of accredited programs.

Progress Opportunities

1. Engaging in discussions with key stakeholders to prioritize qualified Manitoba resident IEDs applying to the International Dentist Degree Program at the University of Manitoba.
2. Continuing support for IEDs, including those preparing for NDEB certification requirements, through the MDA General Practice Study Club.
3. Engaging in discussions with the NDEB for the expansion of preparation supports for applicants undertaking the Equivalency Process.
4. Including in MDA's annual data report data on internationally educated dental specialists and dental assistants.
5. Ensuring any draft agreement between provincial regulatory authorities and third party assessors is in compliance with Manitoba's Fair Registration Practices legislation.
6. Continuing discussions with NDEB to obtain data to improve understanding of the Manitoba IEDs experience in the national certification process.
7. Improving the clarity and consistency of MDA information directed to IEDs regarding English language proficiency.

Fairness Commissioner's Recommendation

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

Manitoba Dental Association Action Plan

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

MDA’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. Engaging in discussions with key stakeholders to prioritize qualified Manitoba resident IEDs applying to the International Dentist Degree Program at the University of Manitoba.</p>	<p>The MDA shall write and meet with the University of Manitoba College of Dentistry administration to understand the current application and selection process.</p> <p>After review the MDA shall meet with the University of Manitoba College of Dentistry to discuss opportunities to identify and select qualified Manitoba residents into the IDDP.</p>	<p>February 2017</p>
<p>2. Continuing support for IEDs, including those preparing for NDEB certification requirements, through the MDA General Practice Study Club.</p>	<p>The MDA shall review process for informing individuals applying or participating in the NDEB Equivalency Process of opportunities to participate in the General Practice Study Club.</p> <p>The MDA shall produce information about the General Practice Study Club that MDA office personnel and other interested stakeholders can provide to interested individuals.</p>	<p>Ongoing</p>
<p>3. Engaging in discussions with the NDEB for the expansion of preparation supports for applicants undertaking the Equivalency Process.</p>	<p>The MDA shall review online resources of other regulatory authorities and their third party assessors for opportunities to provide additional assistance to applicants preparing for the Equivalency Process.</p> <p>The MDA shall engage NDEB on incorporating additional online resources for the Equivalency Process.</p>	<p>Ongoing</p>

Progress Opportunity	Action(s)	Completion Date
4. Including in MDA's annual data report data on internationally educated dental specialists and dental assistants.	The MDA can provide OMFC similar data on dental specialists and dental assistants as provided for general practitioners at the request of OMFC.	Ongoing
5. Ensuring any draft agreement between provincial regulatory authorities and third party assessors is in compliance with Manitoba's Fair Registration Practices legislation.	The MDA shall continue work with third party assessors to produce unified written documents of current agreements.	Ongoing
6. Continuing discussions with NDEB to obtain data to improve understanding of the Manitoba IEDs experience in the national certification process.	The MDA shall meet with OMFC to discuss gathering information on applicant experiences during assessments that is relevant to fair registration practices.	February 2017
7. Improving the clarity and consistency of MDA information directed to IEDs regarding English language proficiency.	The MDA shall review and update online registration and licensing information to improve accessibility and clarity.	January 2017

Statement of Compliance

The Manitoba Dental Association's Action Plan is a positive response to the Progress Opportunities identified in this report and is consistent with the requirements under *The Fair Registration Practices in Regulated Professions Act*.

We trust that these actions will improve our understanding of the experience of Manitoba's internationally educated dentists with the NDEB process and that they will maximise opportunities for success in licensing. I would like to commend MDA for their ongoing efforts to ensure their processes are transparent, fair and timely as well as for their willingness to engage their national body and provincial counterparts in similar efforts.

I truly appreciate MDA's history of engagement with the OMFC and their genuine interest, demonstrated once again through this review process, in further improving their practices to support success of internationally educated dentists.

I look forward a continued, professional and positive working relationship moving forward.



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

The Manitoba Dental Association reports annually to OMFC on the registration of internationally educated dentists to Manitoba. The OMFC will continue to work with MDA on the collection of registration data including the collection of relevant data from the National Dental Examining Board of Canada (NDEB).

MDA received a total of 121 applications from 2011-2015. Among those, 24 or 20% were internationally educated applicants (IEAs).

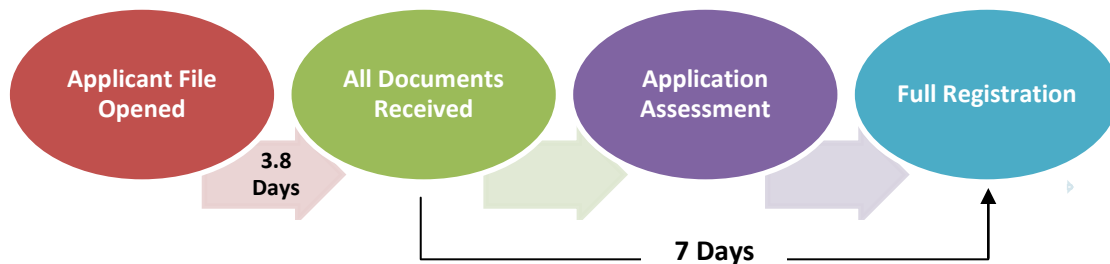
Those 24 IEAs received education from 11 different countries. The top country of education was India with 25% of applicants, followed by those educated in Iran, Iraq and Ireland.

With regard to licensure outcomes, all 24 of IEAs had obtained full registrations by the end of 2015.

The average time to registration upon receipt of all application documents by MDA was one week, with the majority (67%) obtaining their registration within one day. This timeline does not include the time it takes to apply to and be assessed and certified by the National Dental Examining Board of Canada which precedes application to MDA.



Average Time to Full Registration



Of the 24 registrations, 67% were obtained within the same day, 17% were obtained within one week, 1% was obtained between 1 and 2 weeks, and 13% were obtained between 2 and 3 weeks. The longest process time from when documents were received by MDA was 51 days.

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

For additional context, immigrant landings for dentists to Manitoba for 2011-2015 indicate:

Year	Landings
2011	20
2012	17
2013	10
2014	11
2015	20
Totals	78

The NOC code associated with these landings is 3113 Dentists.

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 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"> MDA 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 	September 22, 2016
Progress Meeting	<ul style="list-style-type: none"> MDA and Fairness Commissioner discuss report and possible actions MDA is considering to address progress opportunities 	October 20, 2016
MDA Action Plan	<ul style="list-style-type: none"> MDA’s Action Plan submitted to OMFC 	November 10, 2016
2016 Registration Review Report	<ul style="list-style-type: none"> Report submitted to MDA Report contains the review findings, MDA’s Action Plan, and the Fairness Commissioner’s Compliance Statement 	November 21, 2016
Registration Review Closeout Meeting	<ul style="list-style-type: none"> MDA and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions & how MDA’s action plan will inform the relationship moving forward 	December 15, 2016
Report Release	<ul style="list-style-type: none"> Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Seniors and Active Living and uploaded on the OMFC website 	December 2016

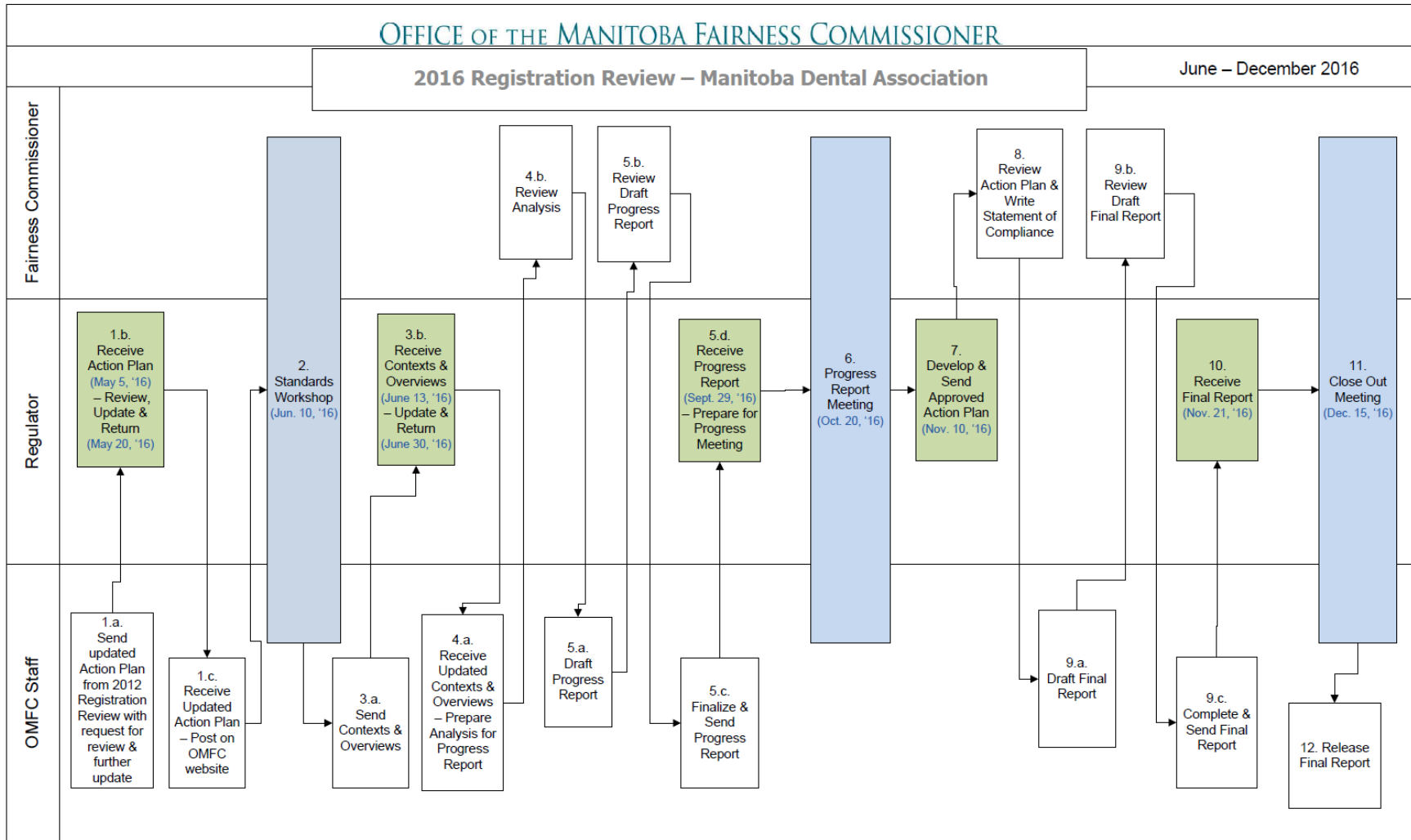
Review participants:

Rafi Mohammed, Executive Director, MDA
 Dr. Marcel Van Woensel, Registrar, MDA
 Dr. Marc Mollot, MDA Board of Directors

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

2016 Registration Review – Manitoba Dental Association

June – December 2016





OFFICE OF THE MANITOBA
FAIRNESS COMMISSIONER

E: omfc@gov.mb.ca

T: 204-945-7353

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

301 – 155 Carlton Street
Winnipeg, MB R3C 3H8

manitobafairnesscommissioner.ca