

2017 Registration Review Report

Psychological Association of Manitoba

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Executive Summary

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

PAM's licensure process for internationally trained psychologists (ITPs) is timely, effective and progressive. Professional work experience is assessed and supervised practice opportunities are available. Depending on the extent of education, Masters Degrees or doctorate level training, different levels of recognition are possible.

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

- improved registration information, including appeal information and a much clearer description of its various registration types and the assessment process
- developed a scoring rubric for the Oral Interview to better ensure reliable, transparent assessments
- introduced the Association of State and Provincial Psychology Boards' online "PLUS system" application portal for easier document tracking and application
- streamlined documentation requirements

The Fairness Commissioner identifies a need for PAM to:

- recognize that landed immigrants have successfully passed a security check as part of their immigration process
- develop alternative documentation policy and information
- introduce information about access to records and financial supports
- continue to work with OMFC to improve registration data collection

In response to the progress opportunities identified by the Fairness Commissioner, PAM committed to taking actions to address these concerns. This includes:

- recognizing federal record and security checks
- committing to review, on a case-by-case basis, alternative documentation applications
- providing information through a link to financial support information
- continuing to collaborate with the OMFC to ensure the timely and accurate data reporting

The Fairness Commissioner sees PAM's Action Plan as a very positive response to the progress opportunities.

Introduction

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

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that registration reviews are to be undertaken at times specified by the Fairness Commissioner. It also stipulates that the content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision-making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

This 2017 registration review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

In this report, the Psychological Association of Manitoba's (PAM) assessment and registration practice is evaluated in terms of its overall state of fair practice and for purpose of identifying progress opportunities. This includes an analysis of PAM's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

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

Context of the Profession in Manitoba

Psychologists research, counsel and teach across a wide range of topics related to the science of psychology or the discipline of how people think, feel and behave. They provide services to individuals, families, organizations and work in a broad range of settings including universities, schools, hospitals, and private practice.

Currently in Manitoba, there is a shortage of registered psychologists. As of December 2016 the Psychological Association of Manitoba (PAM) has 235 registered members. PAM reports that Manitoba has the lowest ratio of psychologists to population in Canada. Consequently, meeting the needs of the community is a challenge. Waiting lists of six months to one year to see practitioners are common in the public system and four to six weeks in private practice. Psychological treatment is not an insured health benefit in Manitoba.

Particularly in the cultural-sensitive field of psychology, increasing the number of culturally diverse practitioners will enrich the services available for Manitoba's diverse population.

Almost all of the internationally trained psychologists that have sought licensure with PAM trained in the United States. Psychologists trained outside of Canada and the United States, often are educated under a different model of clinical theory and practice. These individuals may be working in Manitoba as counselors, school psychologists and other roles that do not require licensure with PAM.

Currently PAM's legislation provides right to title and practice description with exemptions in place for specified employees. PAM is in the process of transitioning under Manitoba's new health legislation, *The Regulated Health Professions Act*, and soon will be authorized to regulate both the right to title and practice of psychology in the province. PAM's move to right to practice legislation will require defining the scope of practice for psychologists, but is not expected to impact those working in related occupations, such as marriage counselors and family therapists.

Overview of Assessment and Registration Process

The Psychological Association of Manitoba (PAM) regulates the title of psychology in the province of Manitoba under the authority of *The Psychologists Registration Act* (C.C.S.M. c. P190) and Regulations 31/2006, 57/2010, 32/2006 and 71/2011. PAM registers individuals as Psychologists, Psychological Associates, Psychologist Candidates, and Psychological Associate Candidates. With the exception of specified employees, no person may use the title of *psychologist*, the *C.Psych.* designation, or use a title or description of services containing the words *psychological*, *psychology*, or *psychologist* unless they are registered with PAM.

Qualifications

Principal qualifications required for registration include a Doctoral or Master's Degree in Psychology accredited by the Canadian Psychological Association, the successful completion of supervised professional work experience and passing the Association of State and Provincial Psychology Boards' Examination for Professional Practice in Psychology (North American Exam) as well as PAM's oral and jurisprudence exams.

Individuals trained outside of accredited academic programs in Canada and the United States must have education and professional work experience judged equivalent by PAM's Registration Committee.

The nature of education, a Doctorate or Master's Degree, as well as the extent of supervised practise required, depends on the category of registration involved.

Registration as a **Psychologist** requires a Psychology Doctoral Degree and the equivalent of two full-time years of supervised applied psychology practice.

Registration as a **Psychological Associate (Supervised Practice)** requires two full-time years of supervised applied psychology practice.

Registration as a **Psychological Associate (Independent Practice)** requires a Psychology Master's Degree, and the equivalent of four full-time years of supervised applied psychology practice.

Candidate standing is available for those enrolled in Psychology Master's and Doctoral programs. Doctorate students are expected to complete a period of post-degree supervision and the North American Exam within two years of receiving their doctoral degree. Master degree students have four to six years upon of receiving their Master's Degree to complete these requirements.

Assessment and Review Process

The steps in PAM's assessment and registration process are as follows:

1. Assessment of Academic Qualification and Professional Work Experience

Applicants complete PAM's application form, pay a \$300 application fee and submit the following documents:

- criminal record and child abuse registry checks performed by the police and child welfare agencies in the country in which the applicant worked
- official transcript of courses and grades for both undergraduate and graduate degrees
- statement verifying licensure in jurisdiction where the applicant was licensed
- references from three registered or licensed psychologists who have known the applicant in his or her work for at least one year
- identification of a primary supervisor
- appraisal form completed by the applicant's primary supervisor
- supervision record form documenting two years of full-time experience obtained under the supervision of a licensed psychologist (four years for psychological associate status)
- record of all supervised experience obtained
- Internationally trained psychologists trained outside of the United States, must also, in addition to the above, arrange the direct submission of a credential assessment from World Education Services

If documents are not in English, notarized translations are required.

Upon completed application, PAM informs applicants in writing within one to two months of their assessment result.

Those with academic qualification obtained outside of the United States undergo an equivalency assessment. PAM evaluates academic credentials in-house using its 'Education Program Criteria' for Master and Doctoral academic programs in psychology.

Applicants are advised of education qualification recognized and the extent of supervised professional practice recognized, as well as their eligibility to proceed with the North American Exam.

2. Supervised Practice

Depending on the applicant's professional experience and registration category, PAM may require up to two years of supervised practice for 'Registered Psychologist' licensure and up to four years for 'Psychological Associate (Independent Practice) licensure.

Applicants are responsible to secure a supervised practice opportunity with a registered member. Supervision by individuals not registered with PAM may be possible with council approval. PAM provides informal networking support and provides information about potential employment opportunities.

PAM needs to approve the proposed supervised practice. Applicants must provide a letter outlining the details of their supervision, including a completed 'Primary Supervisor Agreement' and if applicable, 'Secondary Supervisor Agreement'.

Applicants use PAM's 'Record of Supervision Form' to document activity and log hours of practice. Applicants submit this record to PAM upon completion of their period of supervision.

3. Complete the North American Exam

The Examination for Professional Practice in Psychology is a North American exam, administered by the Association of State and Provincial Psychology Boards in the United States. The exam is an online, four-hour and 15-minute, multiple choice format exam that tests for foundational practice knowledge.

This exam can be undertaken anytime after PAM's initial assessment, including anytime during the applicant's period of supervision.

Identification and confirmation from the regulating authority of the individual's eligibility to write the exam are required. As of 2017, applicants pay a \$687.50 USD fee and schedule to write the exam at a Prometric Assessment Center. A Winnipeg location is available. A variety of preparation materials, including practice exams are available on the Association of State and Provincial Psychology Boards' website. PAM does not limit the number of exams attempts, although no more than four attempts are permitted in a 12-month period. Exam results are provided immediately and detailed exam feedback is provided upon request.

4. Complete PAM's Oral and Jurisprudence Exam

PAM's jurisprudence examination is an open book, multiple choice format exam designed to assess an applicant's knowledge of laws and regulations affecting the practice of psychology in Manitoba.

PAM's oral examination is the last requirement to be completed, and is not administered until all other requirements have been met. This exam is an in-person interview, conducted by a panel of three examiners, registered psychologists with practice experience in the applicants intended area of practice. The exam is focused on determining whether the candidate appears ready to practice independently, has the necessary practical skill set, theoretical knowledge base, awareness of ethical guidelines and ability to engage in reasoning and problem-solving around ethical dilemmas.

Passing the oral exam is mandatory for registration as a Psychologist. This is not required for Psychological Associate registration. Applicants who do poorly or have concerns identified in the oral exam are given remedial opportunities to receive a passing grade. This may involve providing a written essay or being given direction to review material and re-take the oral exam.

5. Register

Upon meeting all of the above requirements, applicants must have malpractice insurance and pay a registration fee – \$250 to \$900 depending on the category of registration. PAM processes the registration application within a few business days.

Appeal Process

PAM's assessment and registration decisions are subject to a two-step appeal process. Appeal information accompanies all of PAM's written assessment decisions that deny registration or subject it to condition. Appeals must be filed with the PAM Registration Committee within 30 days of a decision. Unsatisfied appellants may then appeal, within 30 days of the decision, to PAM's Executive Committee whose members are independent of the original decision makers.

Time and Cost

Depending on the circumstances of the applicant and the type of registration sought, upon completed application, the assessment and registration process will usually take one to three years to complete. The lion share of this process will involve the need to complete supervised practice requirements. There may also be significant delays involved in securing the required documentation. PAM typically renders a decision within 30 to 60 days of receiving a completed application.

Direct cost for the registration process will range from \$1,100 to \$2,500 plus a credential assessment fee. There may be additional fees involved in securing documentation, translating documents or if required, exam re-writes.

Cost

PAM Application fee	\$100
Association of State and Provincial Psychology Boards Application fee	\$200 USD
Credential Assessment	\$145 - \$245
Examination for Professional Practice in Psychology	\$687.50 USD
Jurisprudence Examination	\$100
Oral Examination	\$400
Annual Membership Dues	
• Registered Psychologist	\$900
• Psychological Associate (Supervised Practice)	\$605
• Psychological Associate (Independent Practice)	\$900
• Psychologist Candidate	\$250
• Psychologist Associate Candidate	\$215

State of Progress

The Psychological Association of Manitoba (PAM) is committed to the fair assessment and recognition of internationally trained psychologists (ITPs).

PAM's licensure process for ITPs is timely and effective. Although application numbers are low, all internationally educated applicants from 2011 to 2016 were licensed and practicing in some capacity in under a year. Assessment timelines are prompt, with conditional registration granted within a month or two of application.

Eighty per cent of PAM's internationally educated applicants in this period were educated in the United States. This group benefits by coming from a jurisdiction with similar academic standards and clinical practice model as well as a shared North American professional exam. A few psychologists trained outside the United States also conditionally registered within a few months of application.

Key strengths of PAM's assessment and registration process include the recognition of international professional work experience and the opportunity for supervised practice. Professional work experience is recognized and individuals may have PAM's two to four year supervised practice requirement waived in whole or in part. Supervised practice under conditional registration provides professional orientation and allows applicants to demonstrate competence in the field. PAM provides employment information and networking opportunities to support applicants in securing supervised practice opportunities.

These measures support timely entry into practice and high success rates.

2013 Registration Review and Recent Progress

PAM underwent an OMFC registration review in 2013. At this time, PAM was commended for a variety of best practices. Most notable were policies to recognize work experience, supervised practice opportunities and a licensing regime that offered various levels of recognition, supporting timely entry into practice for applicants with different levels of qualification.

In response to recommendations made by the Fairness Commissioner, PAM:

- improved registration information, including a much clearer description of its various registration types and the assessment process
- added appeal information to assessment result letters
- developed a scoring rubric for the Oral Interview to better ensure reliable, transparent assessments

- signed a formal agreement with the Association of State and Provincial Psychology Boards to allow applicants the use of an online application portal, the PLUS system. This PLUS system provides a document repository and allows applicants to easily track documents throughout their application
- no longer requires applicants to arrange the direct submission of transcripts from educational institutions, if these documents have undergone review by an approved credential assessment agency
- requested the Association of State and Provincial Psychology Boards put an appeal process in place for the Examination for Professional Practice in Psychology. However, the North American body declined to take action

Progress Opportunities and Fairness Concerns

Following the 2013 registration review, PAM committed to review its criminal record check policy, to consider recognizing that landed immigrants have successfully passed a security check as part of their immigration process. This would mean these applicants would only have to supply criminal record and vulnerable sector checks for their time spent in Canada. We understand PAM needs to ensure these federal security checks cover issues of child abuse and endangerment. To date, we understand there is no action and the commitment to streamlining this requirement is outstanding.

PAM's registration information has significantly improved since the last review. However, a few information items still need addressing. There is a need to provide information about PAM's alternative documentation policy, access to records and links to financial support information.

PAM has worked cooperatively with the OMFC to supply registration data on Manitoba's ITPs. Continued work improving data collection will be helpful to ensure we have a complete, fact-based understanding of timelines and outcomes. This data may also be helpful to support any future considerations to improve the 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 PAM's state of progress concerning these key fairness issues:

Timely Registration

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

PAM's licensure process is structured efficiently. Key features that promote efficiency include:

- PAM's licensing regime 'Registered Psychologist', 'Psychological Associate', 'Psychologist Candidate' and 'Psychological Associate Candidate' supports various levels of recognition and timely entry into practice for applicants with different levels of training
- International professional experience is assessed and recognized. Applicants have the opportunity to meet supervised practice requirements and address gaps in academic qualification under conditional license
- While having little experience with applicants trained outside of Canada or the United States, PAM is willing to factor the circumstances of applicants from diverse regulatory environments in terms of its policies concerning the recognition of professional work experience and letters of reference

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

PAM has a history of periodic review for its licensure process. This includes activity after the 2013 registration review for better information, synchronized documentation requirements, and more assessment transparency.

PAM's various standards documents are also subject to periodic review. These include PAM's 'Core Competencies for Professional Practice in Psychology', the Canadian Psychologists Association's 'Code of Ethics for Psychologists' and their 'Guidelines for Providers of Psychological Services'. In 2012, PAM gathered member feedback on a draft Code of Conduct.

PAM also benefits from the review activity the Association of State and Provincial Psychology Boards responsible for the Examination for Professional Practice in Psychology (North American Exam). The exam is subject to regular psychometric scrutiny.

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

PAM has introduced information about the need for applicants to keep up to date on their applications. The recently introduced, North American online application portal, 'PLUS System' allows applicants to see the status of their documents and application.

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).

PAM's licensure process for ITPs meets this standard. Although the licensure process may take several years for applicants to qualify for 'Registered Psychologist' or 'Associate Psychologist', time into practice under some form of conditional registration is well under a year, commendably short. PAM's licensing regime allows individuals to complete academic upgrading and acquire supervised practice while gainfully employed in the field.

Although not a large group and mostly U.S. trained, PAM's registration data for the 2011-2016 period indicates all of its internationally educated applicants qualified for conditional registration in well under a year of application. This is an impressive track record.

Recognition of Professional Work Experience

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

A real strength of PAM's licensing process for ITP is that professional work experience is recognized and factored in the assessment of supervised practice requirements.

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

PAM employs the standards and criteria outlined in its 'Core Competencies for Professional Practice in Psychology'.

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

Canadian work experience is not a mandatory requirement in PAM's licensure process. Depending on the qualifications of the applicant, a period of supervised practice may be required, but international professional experience may exempt the applicant. This is progressive practice.

Supervised Practice Opportunities

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

Supervised practice is available for both 'Registered Psychologist' and 'Associate Psychologist Registration'. Up to four years of supervision may be required (up to two years for Associates). Candidates are exposed to Canadian professional practice, work under a registered member and need to demonstrate competence for independent practice.

Applicants are responsible to secure a supervised practice opportunity with a registered member. PAM provides informal support with networking and information about potential employers. To date, PAM reports no issues with its applicants securing supervised practice opportunities.

These are progressive practices.

Progress Opportunities

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

1. Accepting that landed immigrants have successfully cleared a federal security check will help reduce documentation requirements.
2. Alternative documentation guidelines and information are needed.
3. Information is needed about access to records and financial support opportunities.
4. Continuing work with the OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for internationally educated applicants in Manitoba.

Fairness Commissioner's Recommendation

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

Psychological Association of Manitoba – Action Plan

In response to the Fairness Commissioner’s recommendation, the Psychological Association of Manitoba (PAM) proposed the following Action Plan as of November 14, 2017.

Progress Opportunity	Action(s)	Completion Date
1. Accepting that landed immigrants have successfully cleared a federal security check will help reduce documentation requirements.	At its November 8, 2017 meeting, PAM Executive Council voted to accept federal security checks on landed immigrants, in place of requesting a criminal record check for ITPs activities prior to arriving in Canada.	November 8, 2017
2. Alternative documentation guidelines and information are needed.	At its November 8, 2017 meeting, PAM Executive Council voted to review alternative documentation, on a case by case basis, in exceptional circumstances, where ITPs are unable to provide documentation in support of an application for registration.	November 8, 2017
3. Information is needed about access to records and financial support opportunities.	A link provided by the OMFC (outlining potential financial supports) has been placed on the PAM website. Access to records is guaranteed under Canadian Access to Information laws.	November 8, 2017
4. Continuing work with the OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for internationally educated applicants in Manitoba.	PAM will continue to collaborate with the OMFC to ensure the timely and accurate reporting of ITPs’ registrations.	Ongoing

Action Plan Follow-Up

A planned follow-up meeting with PAM and the OMFC will be scheduled in January 2019 to discuss the status of the action plan implementation.

Statement of Compliance

The Psychological Association of Manitoba's (PAM) Action Plan is a very positive response to the progress opportunities identified in this report.

I am impressed by PAM's prompt actions addressing the progress opportunities. I am also impressed with some of the improvements to the process since our last review, particularly the new online, "PLUS system" application portal.

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

PAM's licensure process works well for individuals trained in the North American clinical model. I am happy to see PAM's progressive assessment approach reflected in strong licensure outcomes -- since 2011, every internationally trained psychologist making application has been successfully registered in some capacity.

This is a real benefit for Manitoba, as there is a lower ratio of practitioners per population than in other provinces, often leading to wait lists.

I look forward to our future work together.



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

The Psychological Association of Manitoba (PAM) reports annually to OMFC on the registration of internationally trained psychologists in Manitoba.

PAM received 69 total applications between 2011 and 2015. Among these applications, seven per cent were internationally educated applicants (IEAs).

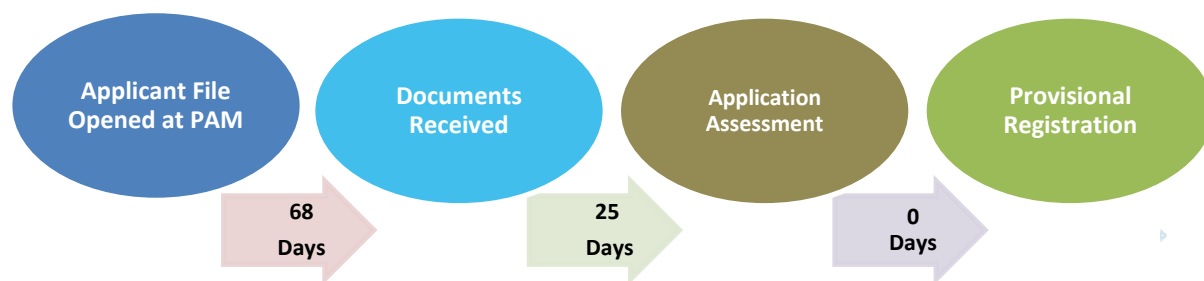
Among IEAs, the top country of education was the United States, representing 89 per cent of IEAs.

Registration Process: Outcomes and Timelines



With regard to licensure outcomes, PAM had nine IEAs between 2011 and 2015; five were fully registered and four were provisionally registered by the end of 2015.

With regard to licensure timelines, the average time to provisional registration upon application to PAM for this group was 93 calendar days, or about three months.



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

For additional context, there were 15 immigrant landings for psychologists, NOC 4151, between 2011 and 2015.

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

Appendix II: 2017 Registration Review Process

The OMFC's review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
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"> • Report on PAM fair practice progress • Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities • Progress opportunity identified • Recommendation from Fairness Commissioner to address the progress opportunity 	October 12, 2017
Progress Meeting	<ul style="list-style-type: none"> • PAM And Fairness Commissioner discuss report and possible actions PAM is considering addressing the progress opportunity 	November 2, 2017
PAM Action Plan	<ul style="list-style-type: none"> • PAM's Action Plan submitted to OMFC 	November 14, 2017
2017 Registration Review Report	<ul style="list-style-type: none"> • Report submitted to PAM • Report contains the review findings, PAM's Action Plan, and the Fairness Commissioner's Compliance Statement 	December 7, 2017
Registration Review Closeout Meeting	<ul style="list-style-type: none"> • PAM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how PAM's action plan will inform the relationship moving forward • Registration Review Report submitted to Minister of Education and Training, the Minister of Justice and uploaded on OMFC website 	December 14, 2017
Action Plan Follow Up	<ul style="list-style-type: none"> • Meeting between PAM and OMFC to discuss status of action plan implementation 	January 2019

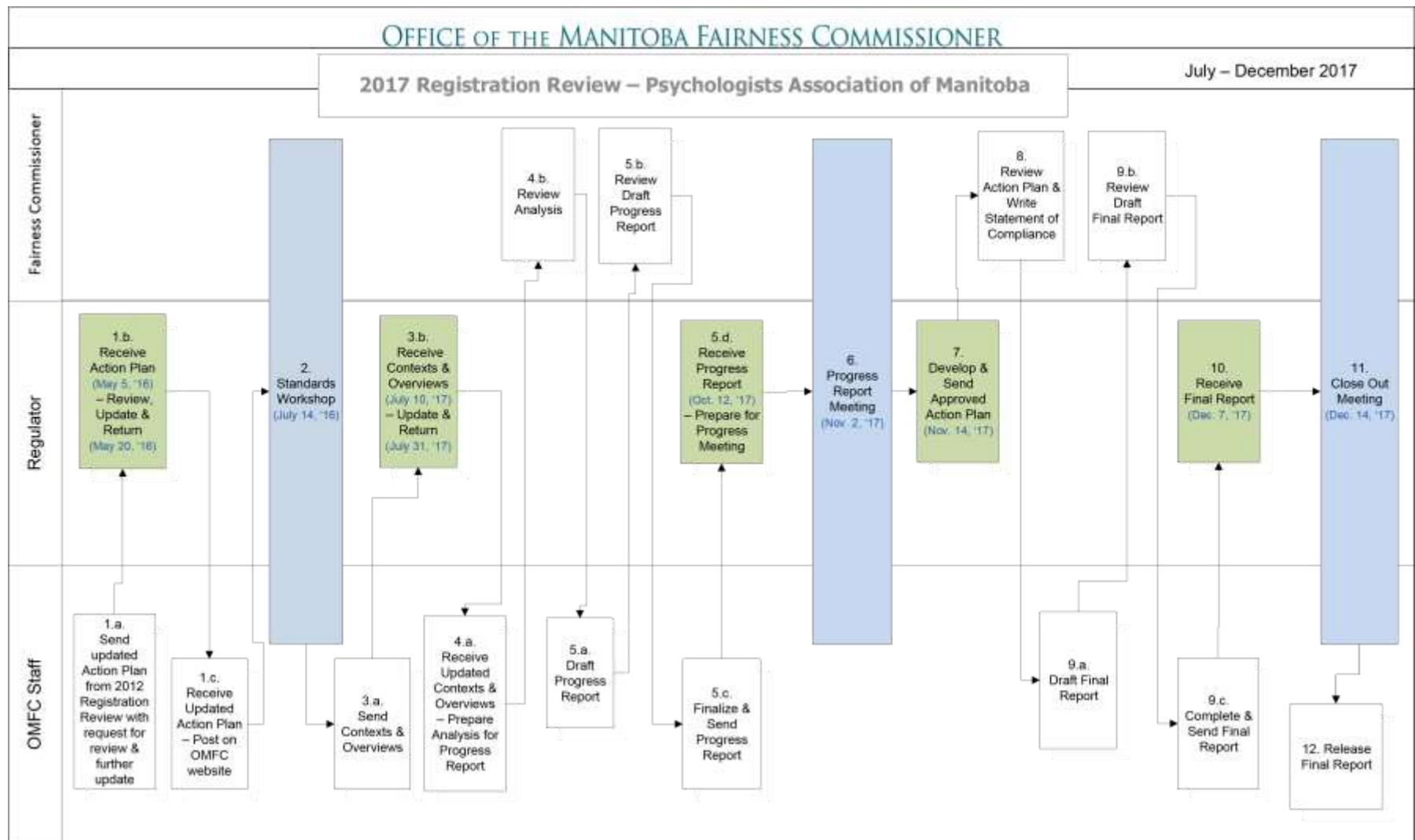
Review participants:

Dr. Alan Slusky, Registrar, Psychological Association of Manitoba

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

2017 Registration Review – Psychologists Association of Manitoba

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