

OFFICE OF THE MANITOBA
FAIRNESS COMMISSIONER

2021 Report on the Implementation and Effectiveness *of The Fair Registration Practices in Regulated Professions Act*

A decade of registration data: outcomes and timelines of
internationally educated applicants to Manitoba regulators
(2011 to 2020)



Office of the Manitoba Fairness Commissioner

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Dear Minister:

It is my duty and privilege to submit the Office of the Manitoba Fairness Commissioner's report. In accordance with Section 13(1) of The Fair Registration Practices in Regulated Professions Act, C.C.S.M. c.F12, "Every two years the fairness commissioner must prepare and submit to the minister a report on the implementation and effectiveness of this Act and the regulations in helping to ensure that the registration practices of regulated professions are transparent, objective, impartial and fair." This report focuses on registration data from regulators subject to the Act for the last ten years – 2011 to 2020, and establishes a baseline for an evidence-based approach to implementation of recent Act amendments.

Respectfully submitted,

original signed by

Amanda Kletke-Neufeld
Acting Manitoba Fairness Commissioner



Bureau du commissaire à l'équité du Manitoba

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Monsieur le Ministre,

J'ai le devoir et le privilège de vous présenter le rapport du Bureau du commissaire à l'équité du Manitoba. Conformément au paragraphe 13(1) de la Loi sur les pratiques d'inscription équitables dans les professions réglementées, « En vue de faire en sorte que les pratiques d'inscription des professions réglementées soient transparentes, objectives, impartiales et équitables, le commissaire à l'équité établit tous les deux ans un rapport sur la mise en œuvre et l'efficacité de la présente loi et des règlements et le remet au ministre ». Le rapport met l'accent sur les données d'inscription fournies par les autorités réglementaires ces dix dernières années (2011 à 2020) et établit une base de données en appui à une approche fondée sur des données probantes en vue de la mise en œuvre des dernières modifications à la Loi.

Le tout respectueusement soumis,

original signé par

Amanda Kletke-Neufeld
commissaire à l'équité du Manitoba par intérim

Message from the Manitoba Fairness Commissioner

The year 2020 will forever be seen as a year the world changed. While the COVID-19 pandemic has brought tremendous challenges, it has also presented opportunity, and a chance for Manitobans to do what they do best – work together in the face of adversity and demonstrate resiliency.

The 30 regulated professions that fall under The Fair Registration Practices in Regulated Professions Act have demonstrated their ability to pivot under pressure, continuing to meet the needs of both their prospective and existing members through adapting processes, assessment methods and even work location. Their timely responses ensure Manitobans continue to have access to qualified, licensed professionals.

This year also marked the retirement of Manitoba's first fairness commissioner, Ximena Munoz, after more than 38 years as a civil servant with the Government of Manitoba. Her work as the commissioner is the foundation of improving fair assessment and recognition of international qualifications in Manitoba.

The Office of the Manitoba Fairness Commissioner (OMFC) is pleased to release its most comprehensive data report to date. Thanks to Manitoba's first fairness commissioner's foresight and regulators' hard work and cooperation, we have 10 years of registration data. This data set in conjunction with registration reviews and ongoing communication with regulators, allows us to provide increasingly meaningful analysis on the timelines and outcomes for internationally educated applicants across professions. The OMFC team has done exceptional work to develop a database with accurate information which will support an evidence-based approach to improving fairness for years to come.

Given that registration for international applicants is generally a multi-year process, this data sets a solid baseline for our work implementing amendments to The Fair Registration Practices in Regulated Professions Act, passed in May 2021.

The Office looks forward to working together with Manitoba regulators, continuing to improve fairness for internationally educated professionals, ensuring processes are not only transparent, objective, impartial and fair, but also timely. Our growing workforce will continually require more skilled newcomers. Our combined efforts to improve timelines towards opportunities for practice, even in limited scope, is an essential part of providing opportunities for a prosperous Manitoba.

Amanda Kletke-Neufeld,
Acting Manitoba Fairness Commissioner

Message de la commissaire à l'équité du Manitoba

L'année 2020 sera à jamais perçue comme celle ayant changé le monde. La pandémie de COVID-19 a engendré des défis de taille, mais elle a aussi donné l'occasion aux Manitobains de faire ce qu'ils font de mieux : travailler ensemble face à l'adversité et faire preuve de résilience.

Les membres des 30 professions réglementées visées par la Loi sur les pratiques d'inscription équitables dans les professions réglementées ont démontré leur capacité à retrouver leurs manches sous la pression, en continuant de répondre aux besoins de leurs membres existants et prospectifs en adaptant les processus, les méthodes d'évaluation et même les lieux de travail. Leur réaction rapide a permis aux Manitobains de continuer d'avoir accès aux services de professionnels agréés qualifiés.

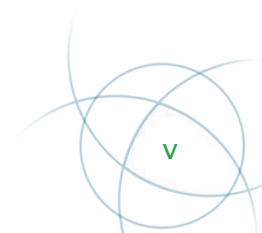
L'année marque également le départ à la retraite de Ximena Munoz, la première commissaire à l'équité, après plus de 38 ans de service dans la fonction publique du gouvernement du Manitoba. Son travail en tant que commissaire a jeté les bases d'une évaluation plus équitable et de la reconnaissance des qualifications internationales au Manitoba.

Le Bureau du commissaire à l'équité du Manitoba est heureux de présenter son rapport de données le plus détaillé publié jusqu'ici. Grâce à la clairvoyance de la première commissaire à l'équité du Manitoba et au travail acharné et à la collaboration des autorités réglementaires, nous possédons maintenant 10 ans de données d'inscription. La collecte de ces données, de pair avec les examens des inscriptions et une communication continue avec les autorités réglementaires, nous permet de procéder à des analyses de plus en plus poussées des calendriers et des résultats des demandeurs ayant fait leurs études à l'étranger pour l'ensemble des professions. L'équipe du Bureau du commissaire à l'équité du Manitoba fait un travail exceptionnel en établissant une base de données fournissant des renseignements exacts en appui à une approche fondée sur des données probantes visant à améliorer l'équité dans les années à venir.

Puisque le processus d'inscription des demandeurs internationaux s'étend généralement sur de nombreuses années, ces données constituent une base solide pour notre travail de mise en œuvre des modifications à la Loi sur les pratiques d'inscription équitables dans les professions réglementées, adoptées en mai 2021.

Le Bureau se réjouit à la perspective de travailler de concert avec les autorités réglementaires du Manitoba, en continuant d'améliorer l'équité pour les professionnels formés à l'étranger, et en veillant à ce que les processus soient non seulement transparents, objectifs, impartiaux et justes, mais aussi rapides. Notre main-d'œuvre croissante aura continuellement besoin de nouveaux arrivants qualifiés. Nos efforts conjugués pour offrir plus rapidement l'occasion d'exercer, même avec une portée limitée, sont essentiels à la prospérité du Manitoba.

Amanda Kletke-Neufeld,
commissaire à l'équité du Manitoba par intérim



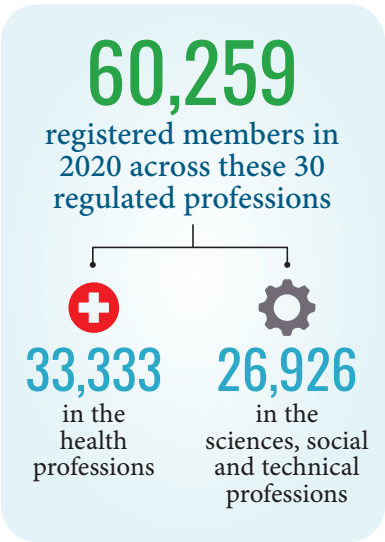
Executive Summary

This report presents registration data over the last decade from Manitoba regulators subject to The Fair Registration Practices in Regulated Professions Act. Covering 2011 to 2020, the report provides information about the number of internationally educated applicants (IEAs) applying to Manitoba regulators, how this group fares in terms of registration outcomes and timelines, and how these outcomes compare to domestically educated applicants (DEAs).

2011 to 2020 registration data indicates Manitoba regulators received 8,861 IEA applications, averaging 886 annually. From 2012 to 2020, IEAs represented 29 per cent of applications (DEAs were 71 per cent). Thirty five per cent of IEAs who applied over the last decade registered within this period. Nearly half of the IEAs, 48 per cent, registered or provisionally registered by the end of 2020.

Comparing IEA/DEA registration rates for 2012 to 2020, DEAs registered at twice the rate of IEAs, 69 per cent compared to 35 per cent. IEAs who successfully registered took, on average, about three years to do so.

Philippines was the top country of education, reflecting Philippines' status as Manitoba's top source country for immigration over the 2011 to 2020 period. Twenty seven per cent of applicants educated in Philippines registered in the reporting period. As a whole, the data indicates some positive progress toward the end of the reporting period with improved registration outcomes. However, we also see somewhat longer registration timelines.



A cautionary reading of these findings is called for, mindful of data set limitations. Registration is a complex, multi-year, multi-stakeholder process, requiring a long timeframe of data from multiple sources to accurately describe. The data set includes individuals who have not yet completed the full registration process, but have begun their journey during the data set period. As the time period of the data set grows, so too will the ability to draw concrete conclusions on outcomes, timelines and comparisons.

Factors that account for IEA outcome and timeline numbers are numerous, complex and profession-specific. As a matter that speaks to the implementation and effectiveness of Manitoba's fairness legislation, the Office of the Manitoba Fairness Commissioner sees opportunities for progress with better strategies of recognition and more accommodating registration processes that allow IEAs to learn, adapt and fit-in.

Many Manitoba regulators have adopted progressive new assessment policies over the last decade. The report presents several examples where a positive impact on outcomes and timelines can be seen in the data. More progress will be demonstrated in future data because registration is a multi-year process, so the impact of recent, positive changes in registration practice are not yet reflected.



Due to challenges posed by the COVID-19 pandemic, the 2020 reporting period saw a slight decline in applications for registration. Admissions to the province were down 44 per cent relative to the preceding nine year average. Applications, assessments, and registrations will likely be disrupted and delayed well into 2021, and potentially longer, given the multi-year nature of registration processes.

While the numbers alone do not tell the full story, OMFC's registration data set provides an opportunity for a fact-based understanding of what is happening to IEAs in Manitoba by profession. Moving forward, OMFC will be able to produce profession-specific data reports. Both by profession and as a group, assessment and registration data supports a baseline and an ability to measure progress against it. It allows for evidence based analysis and recommendations to support fairer practices. None of this would be possible without the ongoing cooperation of regulators.

The Fair Registration Practices in Regulated Professions Amendment Act passed in May 2021, and will come into force upon proclamation. The amended legislation contains several new provisions aimed at making progress. Changes include new duties that provide greater direction for fair practice, ministerial authority to issue compliance orders and transitioning the role of the fairness commissioner to a director integrated into the department of Economic Development and Jobs.

The new office, in collaboration with Manitoba regulators, will focus attention on making progress under the amended legislation. This includes work breaking down labour mobility barriers, improving remedial opportunities, and enhancing collaboration with regulators through better notice and engagement.

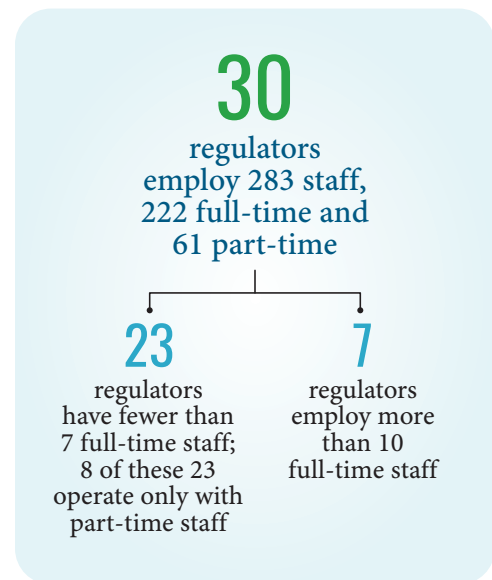


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Glossary

Internationally Educated Applicant (IEA)

An individual with international education applying for registration with a Canadian regulator.

Internationally Educated Professional (IEP)

A professional with international education and work experience. An IEP becomes an IEA when they apply to a regulator for registration.

National Occupational Classification Number (NOC #)

The federal government's standard that classifies and describes the occupations in the Canadian economy.

Provincial Nominee Program (PNP)

In an agreement with the federal government, the PNP gives Manitoba greater control over immigration to the province by instituting a process for the province to nominate and accept immigrants.

Provisional Registration

Temporary or conditional registration that enables some form of practice or title representation. In some professions, this is granted to applicants who substantially meet a regulator's registration requirements, allowing them to complete a period of approved supervised practice. Not all Manitoba regulators offer provisional registration.

Registration

The licensing or certification process whereby applicants acquire legally sanctioned professional recognition with rights to practise and/or title within a jurisdiction.

The term is used broadly in this report to refer to the entire process, from application, assessment and testing, through to registration.

Regulated Profession

An occupation that requires a high degree of expertise, training and qualifications, as well as recognition (registration/licensure) from a regulating authority to practise or to use an occupational title. Regulating authorities are enabled through provincial legislation.

Regulator

A government sanctioned organization, usually an association, institute or college that is responsible for the governance of a profession. It ensures its members are qualified to provide safe and competent practice to the public. Registration is required for membership.

Also referred to as a regulatory body.

Right to Practise Profession

A profession that requires registration with the regulatory body both to use its reserved title and to practise.

Right to Title Profession

A profession that requires registration with the regulatory body to use its reserved title.

Provided individuals do not use the reserved title of the profession, they can work in the field and engage in the activities of the profession without registration.

Regulators under The Fair Registration Practices in Regulated Profession Act

The following are named as regulated professions to which this Act applies:

Health Professions

1. College of Audiologists and Speech-Language Pathologists of Manitoba
2. The College of Dental Hygienists of Manitoba
3. College of Dietitians of Manitoba
4. College of Licensed Practical Nurses of Manitoba
5. College of Medical Laboratory Technologists of Manitoba
6. College of Midwives of Manitoba
7. College of Occupational Therapists of Manitoba
8. College of Pharmacists of Manitoba
9. The College of Physicians and Surgeons of Manitoba
10. College of Physiotherapists of Manitoba
11. College of Podiatrists of Manitoba
12. College of Registered Nurses of Manitoba
13. College of Registered Psychiatric Nurses of Manitoba
14. The Denturists Association
15. Manitoba Association of Optometrists
16. The Manitoba Association of Registered Respiratory Therapists
17. The Manitoba Chiropractors Association
18. The Manitoba Dental Association
19. The Manitoba Naturopathic Association
20. The Opticians of Manitoba
21. The Psychological Association of Manitoba

Sciences, Social and Technical Professions

22. Association of Manitoba Land Surveyors
23. Association of Professional Engineers and Geoscientists Manitoba (Engineers Geoscientists Manitoba)
24. Certified Technicians and Technologists Association of Manitoba Inc.
25. Chartered Professional Accountants of Manitoba
26. The Law Society of Manitoba
27. The Manitoba Association of Architects
28. Manitoba College of Social Workers
29. Manitoba Institute of Agrologists (Agrologists Manitoba)
30. Manitoba Veterinary Medical Association

Introduction

This is the Office of the Manitoba Fairness Commissioner's (OMFC) fifth report on the implementation and effectiveness of The Fair Registration Practices in Regulated Professions Act. The purpose of Manitoba's fairness legislation is to ensure fair registration practices and calls for Manitoba regulators to improve assessment and registration practices for internationally educated applicants (IEAs).

This report focuses on registration data collected over the last decade from the 30 regulated professions in Manitoba that fall under fairness legislation. Annually, Manitoba regulators provide the OMFC applicant data that captures the key steps in the assessment and registration process for IEAs. Less detailed, aggregate application and outcome information is collected about domestically educated applicants (DEAs).

Beginning with immigration data for Manitoba detailing the number, education and source countries of provincial immigration for the 2011 to 2020 period, the report moves on to discuss registration data provided about IEA applications, outcomes and timelines for Manitoba regulators in this period. IEA applications and outcomes are compared against DEA numbers. Outcome and timelines trends are discussed. The report presents a number of profession-specific examples where progressive policy changes can be seen in the data impacting registration timelines and outcomes.

The report provides analysis of the data aggregated across professions but draws attention to the importance of profession-specific analysis and understanding the data set as a work in progress. The report concludes with a discussion of the Manitoba's newly amended fairness legislation. Changes will make the legislation more effective and registration data will support fact-based analysis and progress. Improvements for the assessment and registration of IEAs continues to be a collaborative work between the OMFC and Manitoba regulators.

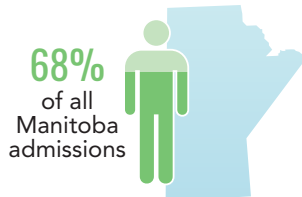
Immigration Facts and Stats

Manitoba's 2011 to 2020 immigration statistics show levels broken down by immigration category and year. Average annual admissions for the period was 14,784; ranging from 8,620 in 2020, to a peak of 18,910 in 2019. The impact of the COVID-19 pandemic can be seen in the drop in 2020, down 44 per cent from the preceding nine-year average.



**Manitoba
Permanent
Residents
2011 to 2020**

147,840



**Manitoba
Provincial
Nominees
2011 to 2020**

100,880

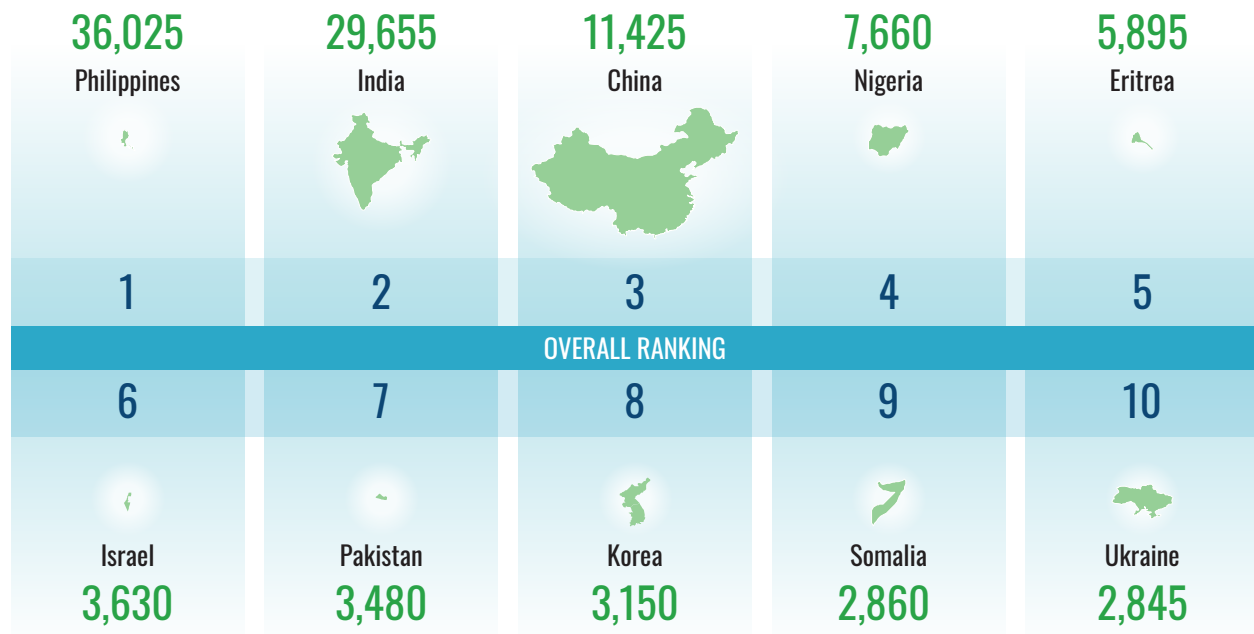


**Manitoba Permanent
Residents 2011 to 2020
Educated Internationally in
Professions under the Act
(Self-identified by NOC)**

9,180

Top 10 Source Countries

Manitoba Permanent Resident Admissions - 2011 to 2020



Source: Created March 11, 2021 by the Government of Manitoba using IRCC Q4 2020 immigration data.

Notes:

- Data are preliminary estimates and are subject to change.
- All values are rounded to the closest multiple of 5.

Education

Of 92,630 admissions to Manitoba in 2011 to 2020 age 25 and up, 56 per cent had completed post-secondary education.

Education Qualification

Diploma/Certificate (Trade)



Bachelor's Degree



Master's Degree



Doctorate - Ph D



Source: Created March 11, 2021 by the Government of Manitoba using IRCC Q4 2020 immigration data.

Notes:

- Data are preliminary estimates and are subject to change.
- All values are rounded to the closest multiple of 5.

Top Self-Regulated Professions

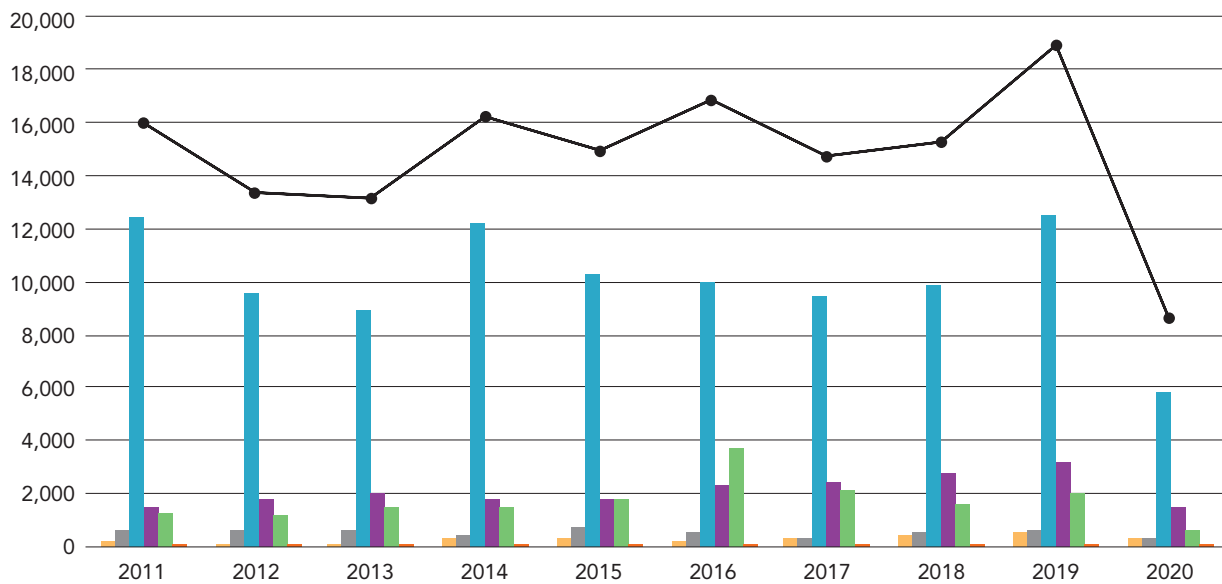
Manitoba Permanent Resident Admissions by Select Occupation - 2011 to 2020 (All Ages)

Self-Regulated Profession	Manitoba Admissions TOTAL 2011-2020
Accountants	2,578
Nurses (Registered Nurses, Registered Psychiatric Nurses, Licensed Practical Nurses, etc.)	2,146
Engineers and Geoscientists	1,515
Technicians and Technologists	1,314
Physicians and Surgeons	412
Pharmacists	302
Dentists & Dental Assistants	211
Agrologists	187
Architects	163
Lawyers	135
Medical Laboratory Technologists	122
Physiotherapists	89
Veterinarians & Veterinary Technologists	45
Social Workers	42
Dental Hygienists	25
Dietitians	25
Psychologists	24
Occupational Therapists	21
Optometrists	18
Land Surveyors	18
Audiologists and Speech-Language Pathologists	14
Respiratory Therapists	12
Podiatrists / Naturopaths	11

*Includes only self-regulated professions under Manitoba's Fair Registration Practices in Regulated Professions Act

Immigration to Manitoba in the Past Decade

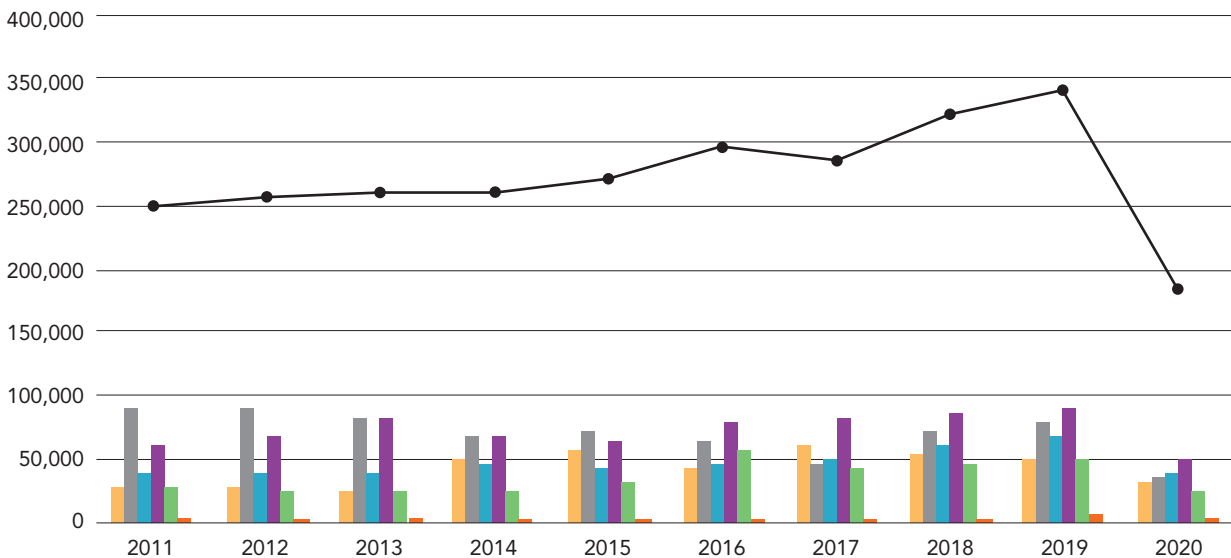
Manitoba Permanent Resident Admissions - 2011 to 2020



Source: Created March 11, 2021 by the Government of Manitoba using IRCC Q4 2020 immigration data.

Immigration to Canada in the Past Decade

Canada Permanent Resident Admissions - 2011 to 2020



Source: Created March 11, 2021 by the Government of Manitoba using IRCC Q4 2020 immigration data.

- Other Economic
- Provincial Nominee Program
- Resettled Refugee & Protected Person in Canada
- All Other Immigration
- Skilled Workers
- Sponsored Family
- TOTAL

According to Statistics Canada's quarterly population estimates, by December 31, 2020 Manitoba was estimated to have just under 1.38 million people representing about 3.6 per cent of Canada's total population. From 2011 to 2020, Manitoba received just over five per cent of Canada's total immigration. By immigration category for this period, the largest groups were provincial nominees (68 per cent), family class (14 per cent) and refugees (12 per cent).

2011 to 2020 Registration Data

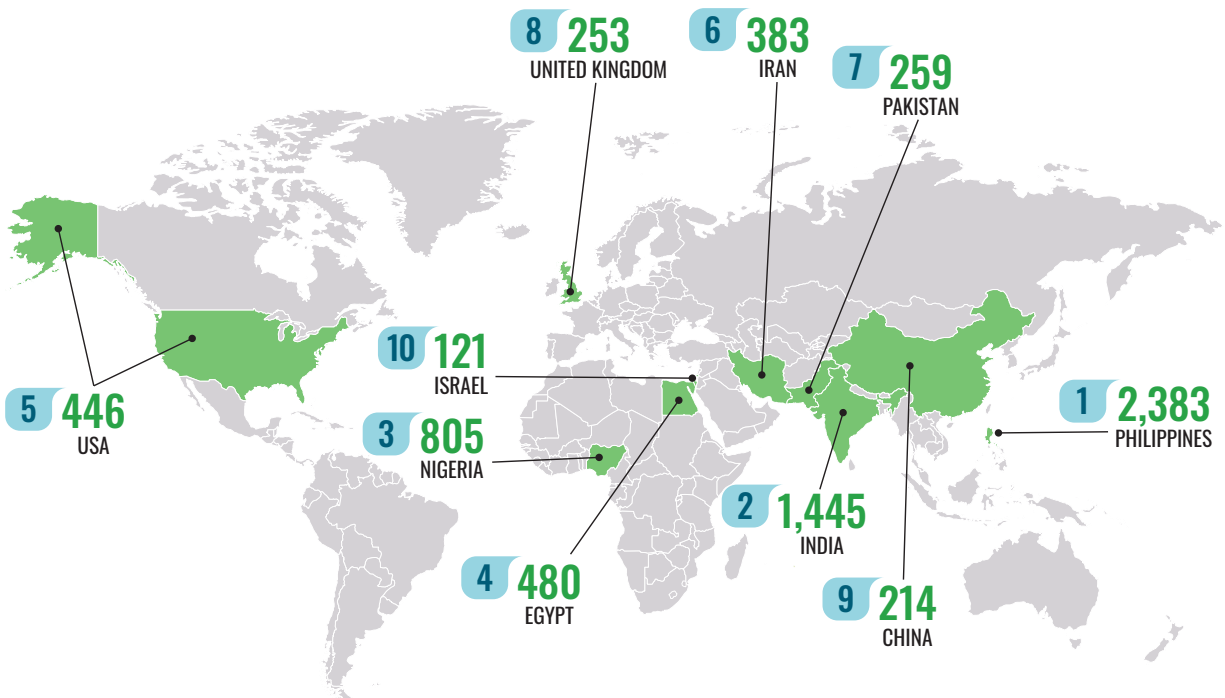
Source: OMFC regulator data

Applications

Country of Education

Trained all over the world, OMFC registration data indicates Manitoba regulators saw applicants educated in 143 countries. Philippines was the top source country of education by a significant margin, followed by India and Nigeria.

Country of Education of Internationally Educated Applicants to Manitoba Professions, 2011-2020

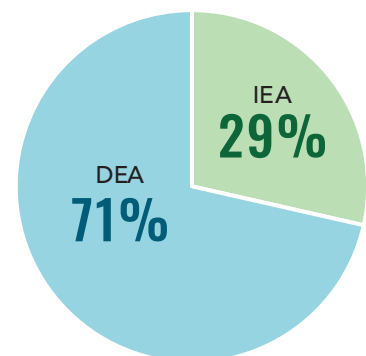


International versus Domestic Applications

The Office of the Manitoba Fairness Commissioner collected data from Manitoba regulators on the number of internationally educated applicants making application from 2011 to 2020. Data collection for domestically educated applicants began a year later and covers the 2012 to 2020 period.

From 2011 to 2020, Manitoba regulators received a total of 8,861 IEA applications. Comparing the number of DEA applications to IEA for the 2012 to 2020 period, there were 8,181 IEAs and 20,478 DEAs. IEAs represented 29 per cent; DEAs 71 per cent of applications from 2012 to 2020.

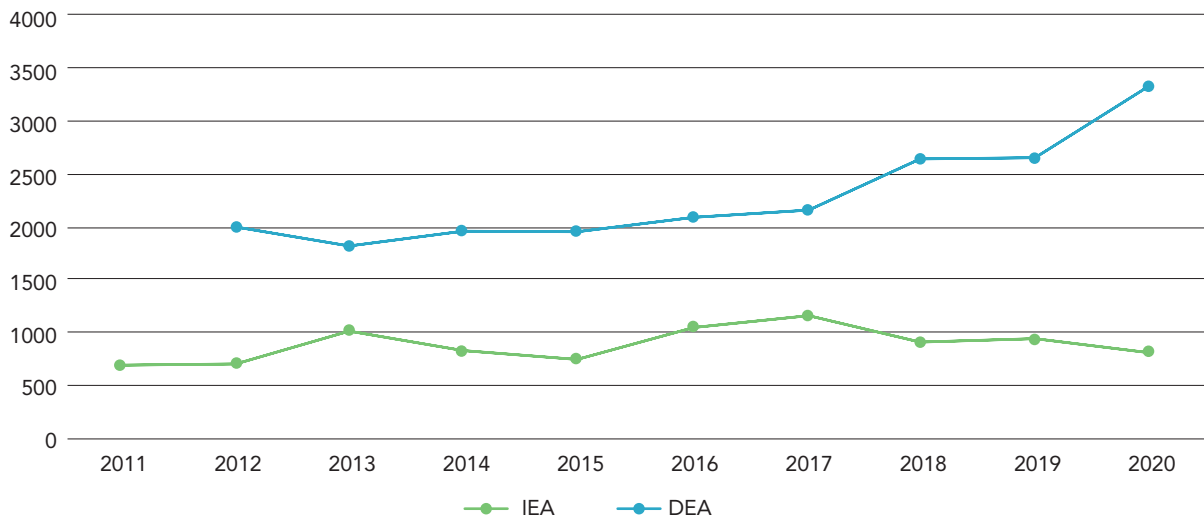
Percentages of Applicants 2012-2020



Applications by Year

From 2011 to 2020, IEA applications averaged 886 per year. Over this period, there is a slight rise in applications annually. From 2012 to 2020, DEA applications averaged 2,275 per year. For DEAs there is a steady rise in applications, more pronounced toward the end of the period. The rise in DEA applications is largely accounted for by the introduction of new professions to the data collection pool later in the reporting period.

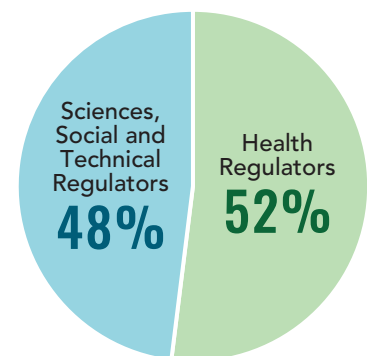
IEA & DEA Applications by Year - 2011 to 2020



Applications to Health versus Science, Social and Technical Professions

From 2011 to 2020, slightly more IEAs, 52 per cent (4,605/8,861), applied to the health professions than science, social, and technical professions, 48 per cent (4,256/8,861).

Number of IEA Applications to Sciences, Social and Technical Regulators vs. Health Regulators



Pre-arrival Applications

Many IEAs initiate their applications prior to landing in Canada. Pre-arrival activity often supports a more efficient application process. Individuals can ensure they make documentation arrangements from their home jurisdictions, saving considerable time and expense. All Manitoba regulators support applicants initiating application abroad. Most regulators will require applicants to undertake assessments at some point in the process either in Manitoba or out-of-province in Canada.

In the 2011 to 2020 period 14 per cent (1,308/8,861) of IEA applications were initiated abroad.

Top Professions with IEA Applications

Manitoba regulators vary by the number of applications they receive from IEAs. Ten professions account for 91 per cent (8,024/8,861) of total IEA applications to the 30 Manitoba regulators subject to fairness legislation. The top five account for 72 per cent (6,357/8,861) of applications.

2011 to 2020

Regulator	IEA Applications
Engineers Geoscientists Manitoba	2,103
The College of Physicians and Surgeons of Manitoba	1,601
Chartered Professional Accountants Manitoba	969
College of Registered Nurses of Manitoba	875
College of Licensed Practical Nurses of Manitoba	809
Certified Technicians and Technologists Association of Manitoba	595
College of Pharmacists of Manitoba	549
The Law Society of Manitoba	261
Manitoba Institute of Agrologists	146
College of Midwives of Manitoba	116
TOTAL	8,024

12

Small
 <500
 members

5 Regulators with < 100 members

- 1 Association of Manitoba Land Surveyors
- 2 College of Midwives of Manitoba
- 3 College of Podiatrists of Manitoba
- 4 The Denturist Association of Manitoba
- 5 The Manitoba Naturopathic Association

7 Regulators with 100-500 members

- 6 College of Audiologists Speech Language Pathologists of Manitoba
- 7 College of Dietitians of Manitoba
- 8 Manitoba Association of Optometrists
- 9 The Manitoba Association of Registered Respiratory Therapists
- 10 The Manitoba Chiropractors Association
- 11 The Opticians of Manitoba
- 12 The Psychological Association of Manitoba

11

Mid-sized
 500-3000
 members

- 1 Agrologists Manitoba (Manitoba Institute of Agrologists)
- 2 The College of Dental Hygienists of Manitoba
- 3 College of Medical Laboratory Technologists of Manitoba
- 4 College of Occupational Therapists of Manitoba
- 5 College of Pharmacists of Manitoba
- 6 College of Physiotherapists of Manitoba
- 7 College of Registered Psychiatric Nurses of Manitoba
- 8 The Manitoba Association of Architects
- 9 Manitoba College of Social Workers
- 10 The Manitoba Dental Association
- 11 Manitoba Veterinary Medical Association

7

Large
 >3000
 members

- 1 Certified Technicians and Technologists Association of Manitoba
- 2 Chartered Professional Accountants Manitoba
- 3 College of Licensed Practical Nurses of Manitoba
- 4 The College of Physicians and Surgeons of Manitoba
- 5 College of Registered Nurses of Manitoba
- 6 Engineers Geoscientists Manitoba
- 7 The Law Society of Manitoba

Registration Outcomes

Annually, Manitoba regulators provide OMFC registration data on the number of internationally educated applicants who receive registration or some form of provisional or conditional registration. Provisional registration is often part of the normal licensing process to full registration; applicants may work under supervision or with certain restrictions on practice.

From 2011 to 2020, Manitoba regulators received of 8,861 IEA applications. Of these applications, 2,916 received registration in the period and 1,375 received provisional registration, but had not yet fully registered by the end of the reporting period. The IEA registration rate is 33 per cent (2,916/8,861). The registration rate including those securing provisional registration is 48 per cent (4,274/8,861). This combined registration and provisional registration rate are particularly relevant. It captures all of the IEAs who applied in the reporting period and can now practise in some capacity. Note: some of the applicants in this period, particularly those that applied late in the period, may register or provisionally register later on, sometime after 2020.

21 

regulators use national, profession-specific third parties in their assessment processes

9

regulators complete their assessment processes themselves with only the use of academic credentials report services, in some cases

33%
(2,916/8,861)

IEA registrations to IEA applications across professions, 2011 to 2020

27%
(2,356/8,861)

IEA provisional registrations to IEA applications across professions, 2011 to 2020. Of this group of 2,356 provisional registrations, 981 went on to register in the reporting period and 1,375 remained provisionally registered at the end of the reporting period

48%
(4,291/8,861)

IEA registrations or provisional registrations by end of 2020 across professions, 2011 to 2020

Country of Education

Often there is a link between registration outcomes and the applicant's country of education. This varies by profession, but it is not uncommon to see some jurisdictions with much stronger registration outcomes. In some health professions, for instance, U.S. educated applicants often have a shorter path to registration, similar to Canadian-trained applicants. In a few professions, it is not uncommon to see high numbers of Canadians who are educated in the United States, as no academic program is available in Manitoba.

Looking at country of education ranked in order of the IEA registration rate for that country, we see the United States has the highest registration rate.

2011 to 2020

Rank	Country of Education	IEA Applications	IEA Registrations	Registration Rate
1	United States	446	269	60 %
2	Egypt	480	243	51 %
3	United Kingdom	253	104	41 %
4	Philippines	2,383	863	36 %
5	Israel	121	43	36 %
6	Iran	383	116	30 %
7	India	1,445	402	28 %
8	China	214	53	25 %
9	Pakistan	259	62	24 %
10	Nigeria	805	158	20 %

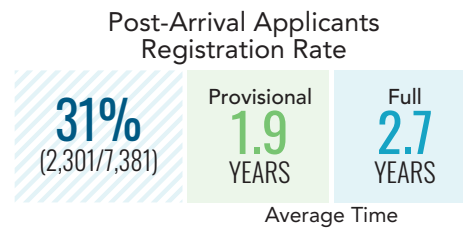
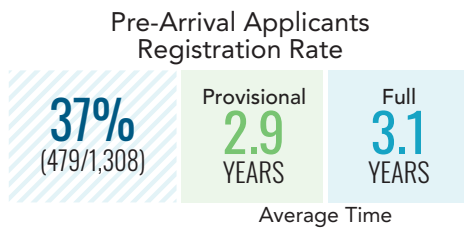
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professions have 'fast-track' opportunities for IEAs who have graduated from certain programs/countries as a result of reciprocity and mutual recognition agreements. For these individuals, an exam(s) requirement is waived or academic upgrading is unnecessary.

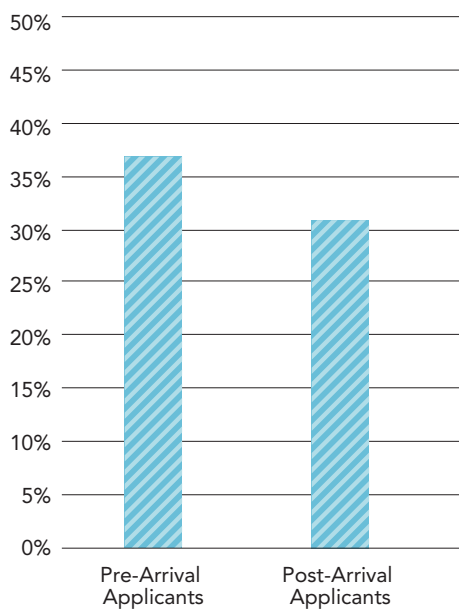
IEAs Applying Pre-arrival

Professional newcomers often report the value and advantage of preparing for application to a profession pre-migration. It can be much easier to arrange for documents to be sent to regulators prior to departure for Canada.

In the 2011 to 2020 registration period, most IEAs initiated applications post-arrival. Applicants who initiated application pre-arrival had a slightly higher registration rate with longer registration timelines:



Pre- and Post-Arrival Registration Rate Comparison



Time to Registration for Pre- and Post-Arrival Applicants

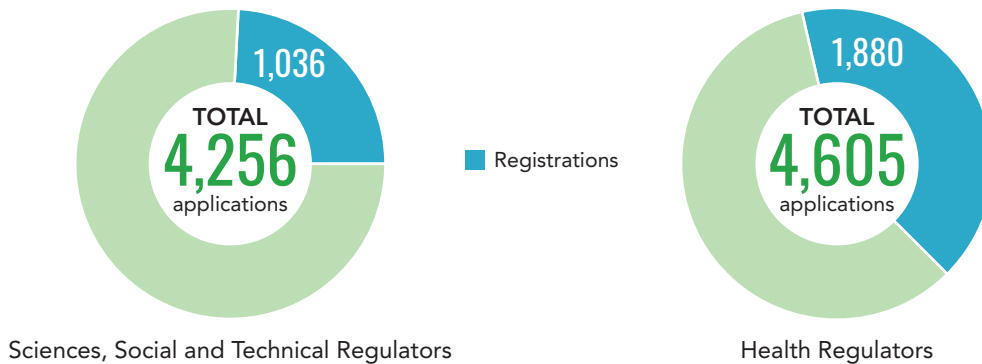


24 professions provide qualified applicants with an opportunity to practise in some capacity and with supervision for a period of time prior to licensure.

Health Professions compared to Sciences, Social and Technical Professions

From 2011 to 2020, 52 per cent (4,605) of IEA applications were to Manitoba's health professions; 48 per cent (4,256) of applications were to Manitoba's science, social, and technical professions. Registration rates were slightly higher in the health professions: 41 per cent compared to 24 per cent in the science, social and technical professions.

Number of IEA Applications and Registrations



IEA & DEA Outcome Comparison 2012 to 2020

OMFC collects data from Manitoba regulators on the number of domestically educated applications received annually as well as the number DEA registrations. Reporting on DEA applicants began in 2012. From 2012 to 2020, Manitoba regulators reported 20,478 applications and 14,310 registrations.

To gain a sense of how IEAs registration outcomes compare to DEAs, we look at the ratio of applications to registrations for these groups in the reporting period. The ratio of applications to registrations is an indicator of the true registration rate that grows stronger or more accurate as an indicator the longer the reporting period. For consistency with the DEA data, the comparison is restricted to the same nine-year reporting window for IEAs as we have for DEAs. Given this nine-year timeframe, a reasonable, albeit limited sense of the registration rate comparison for IEAs and DEAs is possible.

From 2012 to 2020, the per cent of IEA applications to full registrations against the per cent of DEA applications to full registrations:



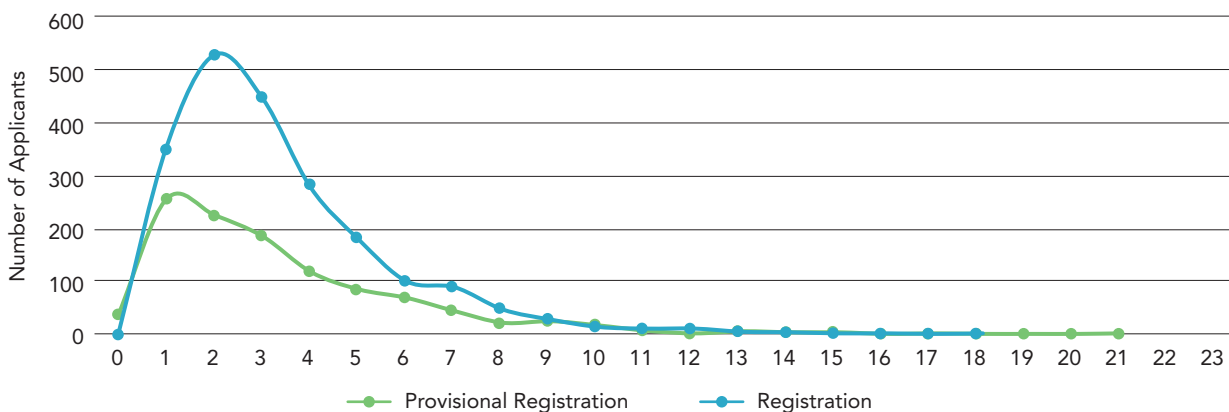
Registration Timelines

Internationally educated applicants who applied and received registration in the 2011 to 2020 reporting period took, on average, about three years to do so. IEAs receiving provisional registration, where the applicant has the ability to practise under provisional registration, took about two years.



The distribution of time to registration and provisional registration are presented below.

Years to Registration



Note: Timelines in excess of 10 years are possible where an applicant has applied to a national body earlier than 2011, in advance of applying to the Manitoba regulator occurring sometime after 2011.

Registration timelines are measured from the date a regulator has all documents they require to initiate assessment until the registration date or provisional registration date. Timeline data are of applications where complete timeline information is available. Some application data is incomplete, where no initial start date or finish date is recorded. For IEA registrations, 91 per cent (2,667/2,916) of files have complete timeline information; for provisional registration, 93 per cent (2,183/2,356) have complete timeline information. There are fewer provisional registrations than full because several regulators do not use or offer provisional registration as part of their normal registration process. Registration timeline information is not collected for DEA files.

Registration Outcomes and Timelines by Profession

Registration rates and timelines vary by profession. This registration data is provided to give a sense of the registration outcomes and timelines by profession. A high or low registration rate, or a long or short timeline, are not telling indicators of a fair process. A number of various factors can impact these outcomes and timelines.

Timelines are measured only for those files for which we possess complete timeline information: from the date an applicant has complete documentation to initiate an assessment, until the date of registration or provisional registration.

Internationally Educated Applicants (2011-2020)

MB Profession	Total Applicants	Total Registrations	Registration Rate	Average time to Provisional Registration (in years)	Average time to Registration (in years)
College of Dietitians of Manitoba	26	–	4%		0.9
College of Licensed Practical Nurses of Manitoba	809	272	34%	2.5	2.2
College of Medical Laboratory Technologists of Manitoba	105	81	77%	3.0	3.0
College of Midwives of Manitoba	116	18	16%	1.5	1.7
College of Occupational Therapists of Manitoba	16	8	50%	1.1	1.6
The College of Physicians and Surgeons of Manitoba	1,601	278	17%	5.3	5.9
College of Physiotherapists of Manitoba	50	31	62%	2.8	3.5
College of Podiatrists of Manitoba	16	16	100%		0.1
College of Registered Nurses of Manitoba	875	387	44%	3.2	2.4

MB Profession	Total Applicants	Total Registrations	Registration Rate	Average time to Provisional Registration (in years)	Average time to Registration (in years)
College of Registered Psychiatric Nurses of Manitoba	87	12	14%	1.5	1.6
Denturist Association of Manitoba	6	–	33%	0.7	2.0
Manitoba Association of Optometrists	37	34	92%		
The Manitoba Association of Registered Respiratory Therapists	–	–	25%	1.3	0.1
The Manitoba Chiropractors Association	61	53	87%		1.4
The Manitoba Dental Association	95	95	100%		2.3
The Manitoba Naturopathic Association	–	–	75%		0.1
College of Pharmacists of Manitoba	549	489	89%		4.4
College of Audiologists and Speech-Language Pathologists of Manitoba	108	82	76%	0.04	1.1
The Opticians of Manitoba	17	9	53%		1.3
The Psychological Association of Manitoba	18	–	22%	0.4	0.4
College of Dental Hygienists of Manitoba	–	–	80%		0.8
Association of Manitoba Land Surveyors	–	–	0%		

MB Profession	Total Applicants	Total Registrations	Registration Rate	Average time to Provisional Registration (in years)	Average time to Registration (in years)
Engineers Geoscientists Manitoba	2,103	334	16%	1.3	3.3
Certified Technicians and Technologists Association of Manitoba	595	307	52%	0.2	0.6
Chartered Professional Accountants Manitoba	968	56	6%		0.5
The Law Society of Manitoba	261	157	60%	3.2	5.9
The Manitoba Association of Architects	65	44	68%	0.5	3.0
Manitoba Institute of Agrologists	146	61	42%	0.6	1.9
Manitoba Veterinary Medical Association	82	54	66%	4.0	5.2
Manitoba College of Social Workers	35	23	66%		1.6
TOTALS	8,861	2,916	33%	2.1	3.1

Values of five or less have been redacted.

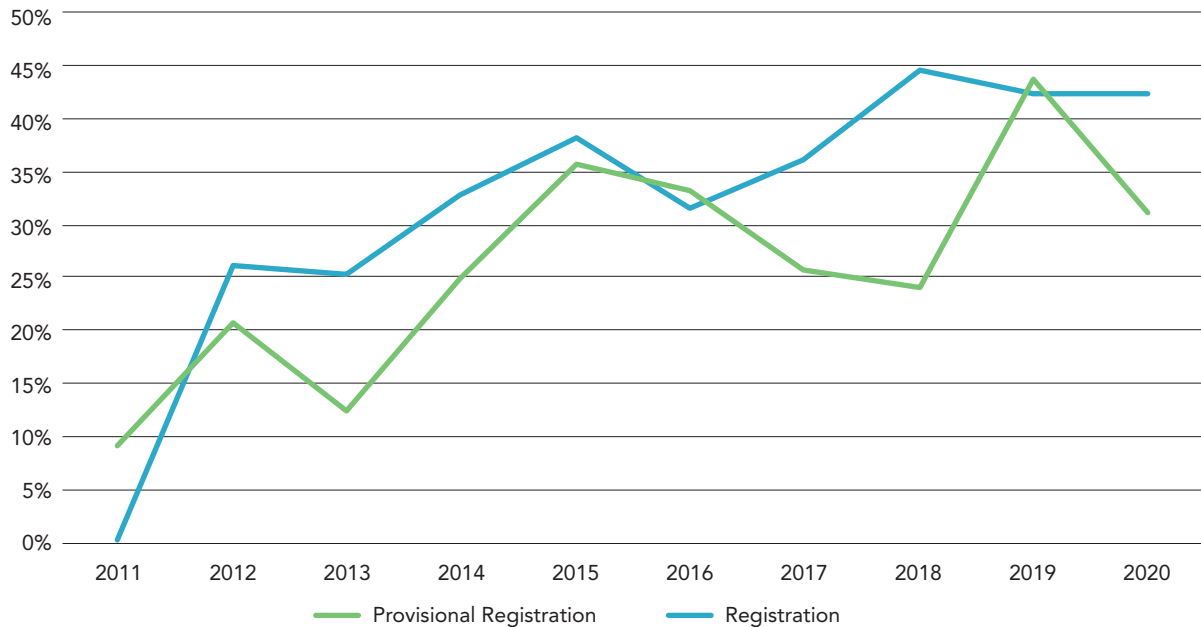
8 professions do not have their own professional education program in Manitoba (*veterinary medicine, audiology and speech-language pathology, chiropractic, naturopathy, podiatry, land surveying and denturism*) – Midwifery education in Manitoba will be offered starting September 2021.

Trends

Registration data for the 2011 to 2020 period indicates a steady increase in registration rates from 26 per cent in 2012 to over 40 per cent in the last few reporting years of the period. Provisional registration rates also see a similar rise. Registration timelines, on the other hand, show worsening numbers as we move through the reporting period, averaging about one year to registration in 2012 to just over three years in the later reporting years.

Registration Outcome Trend

Registration Rate Across the Years - 2011 to 2020

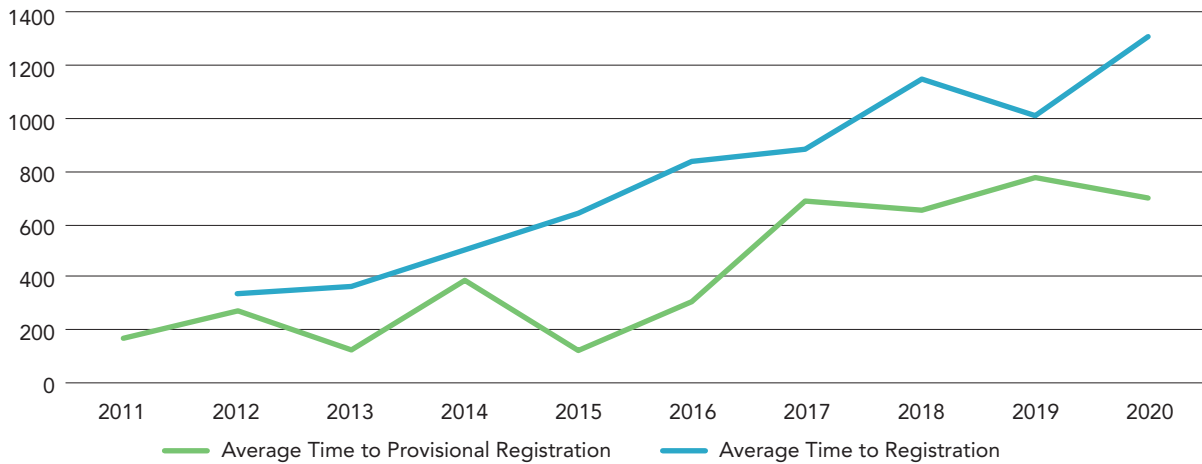


The trend in the outcome graph shows a rise in registrations relative to applications over the reporting period. This is promising. The later years in the reporting period suggest registration rates greater than 40 per cent, somewhat higher than the 35 per cent average for the entire period.

Some of this rise, however, may be accounted for as a matter of the data collection method and not solely a reflection of improving registration outcomes. IEAs who applied to Manitoba regulators prior to 2011 are not included in the data; this means some IEAs who registered in 2011 and years subsequent are not counted. The low number of registrations in the earlier part of the reporting period reflect this phenomenon. Given this consideration, a definitive conclusion about the cause of the rise is not possible.

Registration Timeline

Average Time to Registration by Year - 2011 to 2020



Registration timeline data shows IEA time to registration and time to provisional registration has increased over the 2011 to 2020 reporting period. However, this is not likely as discouraging as it appears. Again, the data collection method has an impact. Starting with applicants who applied to Manitoba regulators in 2011, the only timelines possible for registration in 2011 is one year or less with the exception of those applying to national bodies earlier. As the reporting window grows with more reporting years, the possibility of capturing those IEAs with extended licensure timelines also grows. In other words, the longer data is collected, the more likely it is to see long time-frames to registration show up in the data. In this context, the trend to increased licensure timelines is not necessarily a reflection of changes in assessment and registration processes.

COVID-19

Beginning in the spring of 2020, the COVID-19 pandemic caused delays for applicants with a number of regulators postponing exams and assessments. COVID-19 has also impacted immigration to the province. Delays and disruption will likely occur well into 2021.

Many regulators have responded to the crisis implementing virtual assessments and offering various accommodations to applicants. The move to virtual assessments may become a permanent feature and in many regards, prove beneficial for Manitoba applicants in professions requiring out-of-province travel for assessments.

Admissions to the province were down 44 per cent relative to the preceding nine-year average. In 2020, IEA applications to Manitoba regulators were about average, with registrations slightly above average.

6
professions have
Manitoba-based
bridging programs
for IEAs

Measuring Progress

Although a conclusive determination cannot be drawn about improved registration outcomes and timelines across all regulators over the 2011 to 2020 period, the data does demonstrate progress by profession, when and where a progressive policy has been introduced.

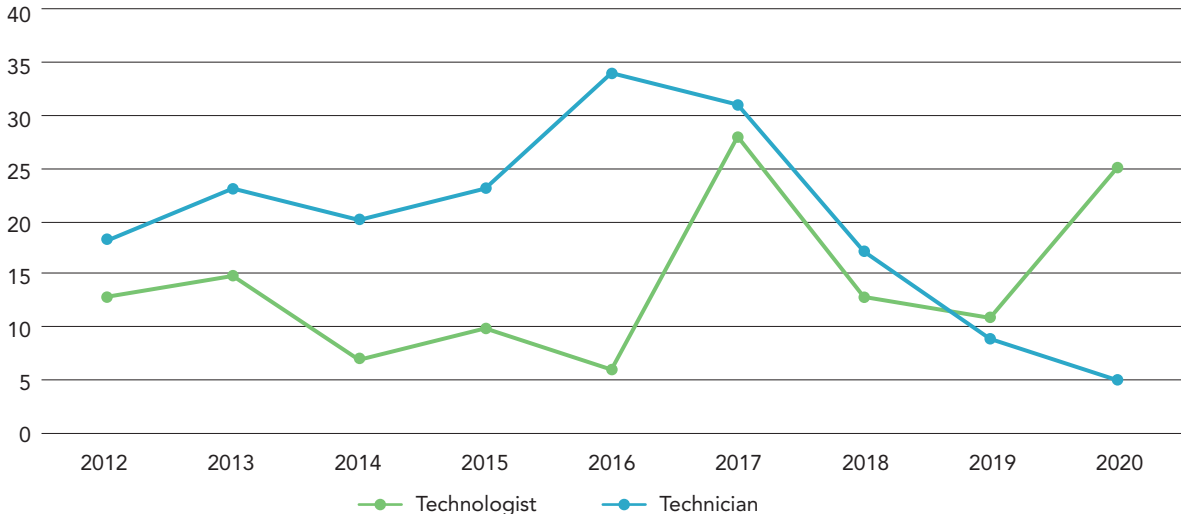
Below are several examples of Manitoba regulators adopting new policies and practices that have made a difference.

Certified Technicians and Technologists Association of Manitoba

In 2018, the Certified Technicians and Technologists Association of Manitoba (CTTAM) introduced policy changes that increase the number of internationally educated applicants (IEAs) recognized as technologists. Many applicants apply to Engineers Geoscientists Manitoba (EGM) before they apply to CTTAM. CTTAM recognizes the academic training of applicants assessed by EGM possessing professional engineering degrees (and as eligible to pursue professional registration). This qualifies them for the higher technologist designation. CTTAM also introduced a provisional technologist designation as well as a stronger strategy to recognize professional experience. The result of these changes is that more applicants now qualify for technologist level certification.

The impact of these policy changes is seen in CTTAM's registration data. More applicants registered at the higher designation of technologist starting in 2019.

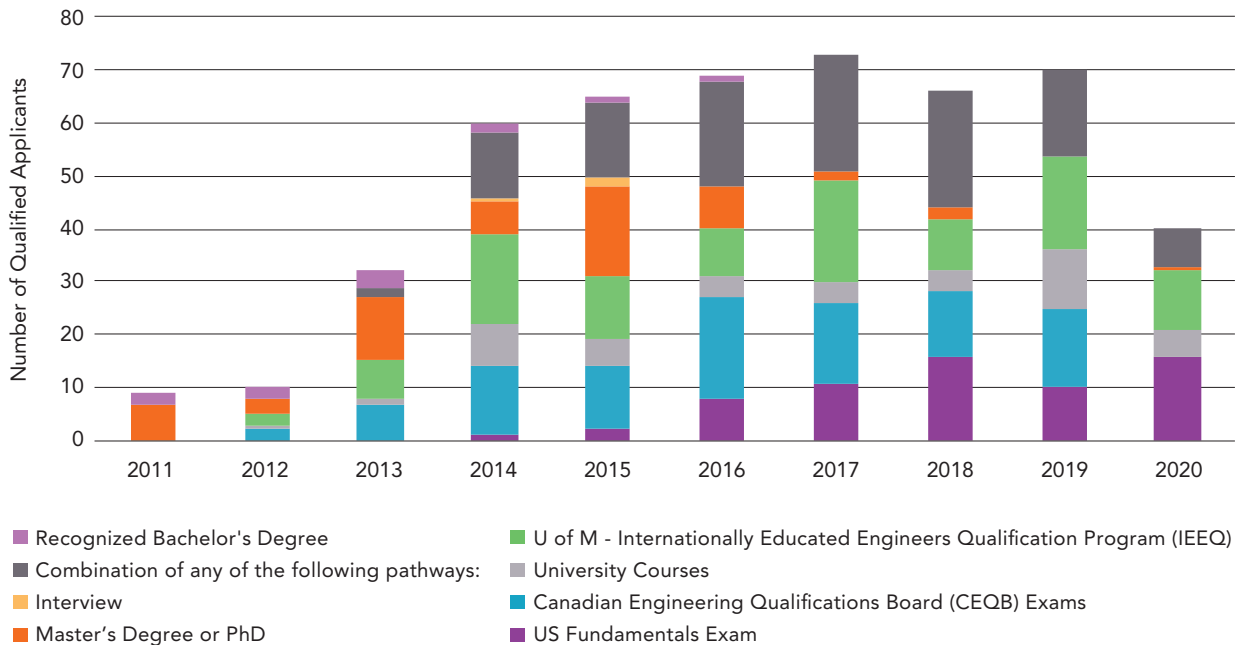
CTTAM Number of Full Registrations - 2011 to 2020



Engineers Geoscientists Manitoba

In 2015, Engineers Geoscientists Manitoba (EGM) began recognizing the U.S. Fundamentals in Engineering Exam, providing IEAs another option to confirm academic qualification, allowing people to proceed to internship. Since the policy was introduced, 64 IEAs met academic qualification this way. In the graph below, the impact of the change is clearly visible – the purple shaded portion of the bars increases significantly the year following the change.

EGM Academic Pathway to Qualification - 2011 to 2020



Chartered Professional Accountants Manitoba

Through various mutual recognition and reciprocity agreements, Chartered Professional Accountants Manitoba (CPA Manitoba) recognizes professionally designated accountants from around the world. For IEAs with professional accounting designations, this is a fast-track opportunity for licensure. International applicants without professional accounting designations must complete CPA's professional and preparation programs, which often takes several years.

Under recognition agreements, 56 IEAs received registration with an average time to registration of 166 days.

The Law Society of Manitoba

In 2011, The Law Society of Manitoba (LSM) introduced a policy to assess professional experience of IEAs. Requirements for articling and for the Canadian Centre for Professional Legal Education Program in Manitoba (CPLED) can be waived, in whole or in part, based on the strength or relevance of the applicant's foreign professional experience. From 2011 to 2020, LSM waived or shortened articling and CPLED requirements for 31 internationally educated lawyers.

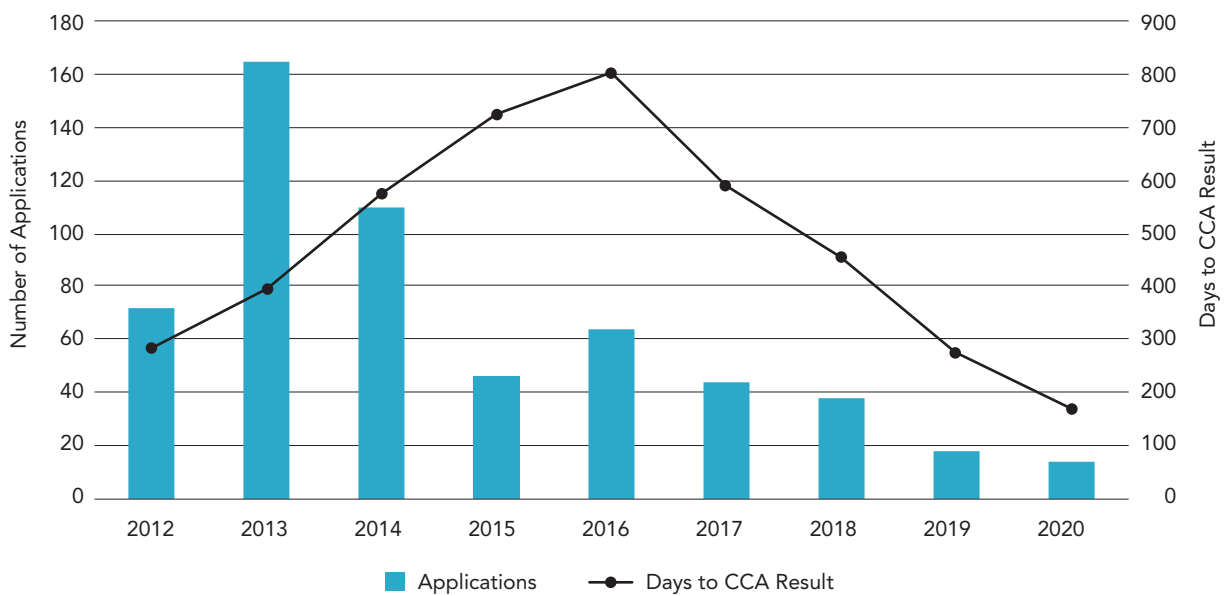
The Manitoba Association of Architects

The Manitoba Association of Architects (MAA) accepts a variety of mutual recognition and reciprocity agreements for architects trained and practicing in various jurisdictions around the world. Applicants with significant professional experience also have a fast-track licensure opportunity applying through the Broadly Experienced Foreign Architects program (BEFA). BEFA allows qualified applicants to have education, exam and internship requirements waived in whole or in part, reducing the time and expense involved in the profession's more conventional, 'EEE – Education, Experience and Exam' assessment and registration process. Registration data indicates 38 applicants registered under either recognition agreements or the BEFA program, representing 86 per cent of MAA's IEA registrations from 2011 to 2020.

College of Licensed Practical Nurses of Manitoba

The College of Licensed Practical Nurses of Manitoba (CLPNM) assesses internationally educated nurses (IENs) with a clinical competence assessment (CCA). The CCA allows a sophisticated assessment of IEN qualification followed by a range of remedial gap training opportunities at Assiniboine Community College. Shortly after introducing the CCA, there were far more IEN applicants than gap training spots available. At the peak of this imbalance, wait times for the CCA exceeded two years. CLPNM took action working with stakeholders to address the issue of both timing and capacity for the CCA as well as gap training opportunities. While there was also a drop in IEN applications at the same time, the changes have addressed the bottlenecks. Currently there is no concerning wait time for the CCA in this profession, demonstrated below.

Days from File Open Manitoba to CCA Result - 2012 to 2020



Limitations of the data

Covering a span of 10 years, this is the Office of the Manitoba Fairness Commissioner's most comprehensive data analysis report to date, allowing a strong, statistical picture of how internationally educated applicants fare. The data set, however, has limitations, which are important to consider when interpreting the numbers.

The number of IEA registrations in the data set does not capture all of the IEA registrations in the reporting period. IEAs who applied to Manitoba regulators before 2011, but registered subsequently, are not counted. This accounts for somewhat lower registration numbers we see early in the reporting period.

The number of IEA applications does not truly represent the number of Manitoba IEAs that sought application. For about half the regulated professions, applicants initiate application with third-party, national bodies. Those who fail to pass or be certified at this initial stage generally do not apply to the Manitoba regulator and so are not recorded in the data set.

The timeline data for registrations and provisional registrations are taken only from IEA applications where complete timeline information is provided, both a start and stop date. Several regulators with first-step, national bodies only began reporting these dates to the OMFC later in the reporting period. IEA applications with missing start dates were not tallied in the timeline numbers presented in this report. For IEA registrations, 93 per cent (2,667/2,863) have complete timeline information; for provisional registrations, 94 per cent (2,183/2,321) of files have complete timeline information.

Timeline information is only collected for IEAs. Timeline information is not collected for DEAs, so no comparison can be made between the two types of applicants.

A work in progress, the data set becomes stronger with each year of data added. The completeness of the data has improved significantly over the last decade. Continuing work in co-operation with Manitoba regulators will allow a more accurate and complete picture. There may be opportunities to secure a sense of IEA pass rates with many national bodies, as well as the advantage of drawing from an increasingly larger time window of data.

Moving Forward

The registration data presented in this report provides a picture of timelines and outcomes of internationally educated applicants applying to Manitoba regulators over the last decade and how IEA outcomes compare to domestically educated applicants.

Across professions, the data shows IEAs registering at significantly lower rates than DEAs and taking two or three years to do so. Data and data set limitations do not easily allow any definitive conclusion about any trend to improvement across professions. Outcomes, timelines and IEA/DEA registration rates vary a great deal by profession.

The Fair Registration Practices in Regulated Professions Act has been in force since 2009. Since that time, Manitoba regulators have worked with the Office of the Manitoba Fairness Commissioner to improve fair assessment and registration for IEAs. Applicants now participate in more transparent processes, with a higher degree of procedural fairness and natural justice. Several regulators offer greater supports, accommodations and licensure pathways. One of the more promising trends in the professions is the increasing number of new and expanded mutual recognition or reciprocity agreements that support fast-track licensure opportunities.

The registration data does not always tell this story well. This progress is of consequence and is making a difference. Progress in procedural fairness and natural justice may not show itself in a pronounced way in the data. Progress in more substantive matters – more licensure pathways, greater supports, and expanded recognition – has a direct impact on outcomes and timeline data, but across professions may be offset with the trend to new, dedicated IEA assessments that bring a greater scrutiny of qualification, identifying more gaps.

Factors that account for comparatively poor IEA outcomes and extended licensure timelines are complex and vary by profession. Common factors include gaps in academic qualification, limited remedial gap training opportunities and performance issues on regulatory assessments. Delays and extended licensure timelines for IEAs are often a product of difficulties supplying documentation, the numerous assessments involved and time needed for remedial academic and gap training. Some delays are applicant driven, and reasons vary as much as each individual’s circumstance – initial settlement, family, financial pressures all impact the process on an individual basis. High cost can be an issue. In some professions, differences in academic training and professional practice differ markedly abroad. In others, difficult regulatory exams that follow graduation for Canadian professionals require an extensive return to study for IEAs.



Some barriers are more warranted than others, and some, more easily remedied than others. Registration data alone does not tell us to what extent poor outcome and timeline numbers disclose fairness issues. OMFC's profession-specific registration review reports provide analysis of fair practice, recommendations for improvement, as well as regulator responses and action plans. Moving forward, profession-specific registration data can become a better aide to support this review work. It discloses a picture of what is happening, a baseline metric, and gives the OMFC and Manitoba regulators a critical tool to analyze and assess policy change.

On April 1st, 2015 the Social Work Profession Act came into force in Manitoba, and the Manitoba College of Social Workers came under fairness legislation.

To make progress in IEA outcomes and timelines, the OMFC sees a need for continued progress recognizing international qualifications and with more accommodating registration processes that allow IEAs to learn, adapt and fit-in. This should not and need not, come at the expense of protecting the public, nor involve compromising standards.

Amending Fairness Legislation

The Fair Registration Practices in Regulated Professions Amendment Act, passed in May 2021 introduces a variety of changes to Manitoba's fairness legislation aimed at a renewed, collaborative effort between Manitoba regulators and the province to improve internationally educated applicant outcomes, timelines and fair practice.

Amendments to the legislation include:

- More effective administration of the Act by transitioning the role of the Manitoba fairness commissioner to the director of fair registration practices housed within the department of Economic Development and Jobs
- Introducing several new duties for regulators to:
 - take reasonable measures working with post-secondary institutions and employers to ensure remedial opportunities for IEAs to address gaps
 - ensure registration requirements and assessments are necessary
 - comply with labour mobility and domestic trade agreements
 - notify the director of fair registration practices of any changes to assessment and registration practice
- Stipulating authority for the minister to make regulations setting timeliness standards for registration processes
- Providing authority to the minister to issue compliance orders for serious issues of non-compliance and contravention of the legislation

Manitoba health professions are currently transitioning under The Regulated Health Professions Act (RHPA). This umbrella legislation modernizes the statutes of the health professions setting out consistent rules and processes for governance, discipline and registration. It supports greater accountability, inter-professional collaboration and government influence. The College of Physicians and Surgeons of Manitoba, The College of Audiologists and Speech Language Pathologists of Manitoba, The College of Paramedics of Manitoba and the College of Registered Nurses of Manitoba currently operate under the RHPA.

These amendments will make Manitoba's fairness legislation more effective. Anticipated impacts include a better-coordinated and integrated office working within the department of Economic Development and Jobs, a renewed focus on remedial opportunities for IEAs, better

compliance with labour mobility agreements and greater compliance to the legislation as a whole. These changes will help spur progress with improved success rates and timelines for newcomer professionals.

Director of Fair Registration Practices

The director of fair registration practices will assume a role and responsibilities very similar to the Manitoba Fairness Commissioner. The director will be responsible to work with Manitoba regulators to ensure fair, timely and effective registration practice for IEAs. Assessment and registration practice of a profession will be subject to periodic review with an eye to identifying progress opportunities.

The Manitoba Fairness Standard will be revised to reflect the new duties of the amended legislation in the Fair Registration Practices Code. In consultation with regulators and other relevant stakeholders, the office will develop policies and processes concretely explaining and identifying what is required to satisfy the new duties.

Collaboration

Moving forward, the cornerstone of the Office's work will continue to be collaboration. This means engaging Manitoba regulators, government departments and other stakeholders to ensure strong gap training and remedial opportunities are in place for regulators to create new opportunities and improve IEA outcomes.

The new duty stipulating the need for Manitoba regulators to respect labour mobility agreements will support a timely, pro-active approach to ensure barriers are removed. This will serve as a natural complement to the complaints driven engagement of Manitoba's labour mobility legislation.

The new notification strategy will support timely, proactive engagement with regulators. Issues can be raised in advance of implementation and unintended barriers will be more easily avoided.

Review work with regulators has been and remains a collaborative effort. Manitoba regulators are committed to being fair and implementing effective and efficient registration practice for IEAs. Registration practice has evolved dramatically over the past twenty years and reflects this commitment. Further progress will continue to come through collaboration, working together to better maximize outcomes and shorten timelines for IEAs.

Ensuring fair recognition of skills and training of IEAs and skilled workers will strengthen opportunities for a prosperous Manitoba.

On September 1st, 2015 the Chartered Professional Accountants Act came into force in Manitoba, merging Manitoba's accounting professions and repealing four other accounting related acts (The Certified General Accountants Act, The Certified Management Accountants Act, The Chartered Accountants Act and The Certified Public Accountants Act).

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