



# **OMFC REGISTRATION REVIEW**

**Manitoba Association of Registered Respiratory  
Therapists  
Final Registration Review Report (2013)**

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OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER



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## Introduction

This Final Registration Review Report presents the results of the Office of the Manitoba Fairness Commissioner's (OMFC) registration review with the Manitoba Association of Registered Respiratory Therapists (MARRT) as of March 2013.

Registration reviews are conducted as part of the Fairness Commissioner's mandate to review the registration practices of regulatory bodies subject to *The Fair Registration Practices in Regulated Professions Act (Act)*.

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations to improve compliance. Compliance refers first and foremost to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants. It also refers to the co-operation of the regulator with the Fairness Commissioner.

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

The OMFC's review process culminates in a Final Registration Review Report, complete with an Action Plan from the regulator. This report is a public document submitted to the Province's Minister of Immigration and Multiculturalism and posted on the OMFC's website.

## Review Process

For the purposes of the 2012/13 registration review cycle, regulatory bodies with few internationally educated applicants and/or that rely heavily upon third parties for their assessment process participated in a self-assessment review process.

The review process had several steps: agreeing to a review schedule, arranging for the involvement of key staff and council members, participating in a two-day self-assessment workshop, drafting an action plan and finalizing the plan in consultation with the Fairness Commissioner.

The process was designed to support meaningful reviews that concretely identify fairness issues and lead to progressive change.

### The Fairness Standard and Self-Assessment Workshop

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As a first review encounter with the OMFC, regulatory practice was evaluated against a single broad fairness standard as defined by the OMFC's *Fairness Standard and Criteria Document*:

***Dedicated and fair practices are applied for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure their effectiveness.***

This fairness standard covers the full spectrum of fair assessment and registration practice and is defined with multiple elements and criteria in the *Fairness Standard and Criteria Document*.

Over the course of a two-day self-assessment workshop, the standard was explained and regulators examined their practice in light of the various elements and criteria involved. Special emphasis was placed on the importance of clear, complete and accurate assessment and registration information, fair third party assessment practice and the consideration of qualifications acquired through professional work experience. Solutions and best practice models were presented as regulators drafted action plans to address issues of concern.

### Action Plan & Compliance Statement

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Shortly after the workshop, regulators submitted board-approved Action Plans to the OMFC. Regulators met with the Fairness Commissioner to discuss the plans and in some instances, revisions were made.

The Action Plan contained in this report has been reviewed by the Fairness Commissioner and is comprised of actions needed to address fairness concerns and improve compliance to *The Fair Registration Practices in Regulated Professions Act*.

Concluding this report, the Fairness Commissioner's Compliance Statement provides comment on the suitability of the regulator's Action Plan and the overall compliance of the regulator's registration practice.

# Overview of the Assessment and Registration Process of the Manitoba Association of Registered Respiratory Therapists

The Manitoba Association of Registered Respiratory Therapists (MARTT) regulates the practice of respiratory therapy in Manitoba under the authority of *The Registered Respiratory Therapists Act* (C.C.S.M. c. R115) and Regulation (342/88 and 237/2006). No person can practice respiratory therapy or use the title 'Registered Respiratory Therapist' without registration with MARTT.

Respiratory therapists plan, administer and evaluate treatments for people with respiratory and cardiac conditions. They work in hospitals, clinics, private industry and research.

Provincial immigration statistics indicate that 3 internationally educated respiratory therapists immigrated to Manitoba from 2005 to 2011.

## Qualifications

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Substantive qualifications required for registration as a registered respiratory therapist involve graduating from an educational program recognized by the Council on Accreditation for Respiratory Therapy Education and successfully writing either the Canadian Board for Respiratory Care's (CBRC) National Certification Exam *or* the National Board of Respiratory Care examination in the United States *or* Quebec's Épreuve Synthèse.

Internationally educated respiratory therapists (IERTs) must undergo a Prior Learning Assessment to determine the substantive equivalence of their qualifications against the criteria and standards defined by a Canadian approved respiratory program. IERTs must also successfully pass the National Certification Exam.

## Assessment and Registration Process

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### *National Certification Exam & MARRT Registration*

Graduates of accredited Canadian programs first apply to the Canadian Board for Respiratory Care to write the National Certification Exam. This involves completing an application form and paying a \$700.00 exam fee. Documentation involves verification of academic credentials and identification.

The National Certification Exam is comprised of two parts, two and four hours respectively, both multiple-choice format. The exam evaluates foundational knowledge of respiratory care as defined by the National Competency Profile. The exam is offered in January and July at various centres across the country, including Winnipeg. Successful completion of the National Certification Exam results in CRBC certification.

Upon CRBC certification, applicants then apply to MARRT through an on-line application form. There is a \$25.00 application fee and a \$175.00 registration fee.

### ***Internationally Educated Respiratory Therapists***

Graduates trained internationally initiate the registration process by first applying to MARRT. Applicants complete an on-line application form, pay a \$25.00 application fee and supply the following documents:

- originals of notarized certificate(s), degree(s) and transcripts
- proof of registration or eligibility to be registered as a respiratory therapist in the applicant's country of origin
- proof of participation in continuing professional development from applicants previous country of practice
- verification of work history indicating at least 720 hours in the past four years

Applicants must undergo a Prior Learning Assessment conducted by an approved Canadian academic program: currently this can occur at Conestoga College in Kitchener, Ontario; or Michener Institute for Applied Health Science in Toronto, Ontario; or Thompson Rivers University in Kamloops, British Columbia.

The Prior Learning Assessment recognizes prior learning of skills, knowledge or competencies that have been acquired through employment, formal and informal education. Learning is assessed against individual course credits in the Respiratory Therapy program. Challenge exams and portfolio development are the primary methods of assessment.

For PLA assessment timelines, costs and documentation requirements, MARRT directs applicants to contact the academic programs that offer PLA in Ontario and British Columbia.

The PLA assessment results are evaluated by MARRT to determine whether the applicant meets the Canadian standard or requires partial or complete re-training. Applicants who fully meet standard or who complete any requisite remedial coursework are deemed eligible by MARRT to write the National Certification Exam.

Applicants must now proceed as above, applying to the CRBC to write and pass the National Certification Exam and then proceed to register with MARRT.

### **Appeal Process**

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Following *The Registered Respiratory Therapists Act*, registration decisions that deny or subject registration to condition can be appealed to MARRT's board of directors. Written notification must be provided by the appellant within 30 days of the decision. Appeals hearings are held within 30 days of notification. Unfavorable appeal decisions may be further appealed to the Court of Queen's Bench. Appeal information accompanies MARRT's registration and assessment decisions.

### **Time and Cost**

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The time and cost to register with MARRT will vary depending on the circumstances of the applicant. Internationally educated respiratory therapists (IERTs) will face the time and expense of securing a PLA assessment at an out-of-province, approved



academic program. MARRT reports that most IERTs require additional, remedial coursework before they are deemed eligible to write the National Certification Exam. This means that a time range of 2-4 years will be a realistic estimate for most IERTs.

Cost will also vary significantly for IERTs. Remedial academic coursework is potentially several thousand of dollars. Direct costs total \$900.00 plus the PLA fee. There will be significant associated costs, if out-of-province travel is required for the PLA assessment.

***Fees***

National Certification Exam	\$700.00
Conestoga College PLA per course	\$134.34
Initial registration fee	\$25.00
Annual license fee	\$175.00

## **Manitoba Association of Registered Respiratory Therapists' Action Plan**

In response to the self-identified Compliance Issues, the Manitoba Association of Registered Respiratory Therapists proposed the following action plan as of March 2013. The plan is reprinted under the 'MARRT's Planned Actions' column in the table below.

The MARRT's Action Plan will form the basis of its relationship with the OMFC moving forward. The plan is monitored by the OMFC and will be tracked in the 'Completion Date' box of the Action Plan as it comes to fruition. As the report will be available online, this allows any interested party to see the progress to date.

Compliance Issues	MARRT's Planned Actions	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>There is a need to improve MARRT's Information provided to applicants.</p>	<ul style="list-style-type: none"> <li>• Submit request for funding to OMFC to update website providing specific link for Internationally Trained Applicants. Website to include the following items in an application package:</li> <li>• Creation of a step by step process to ensure the applicant has clear information on how to proceed</li> <li>• MARRT website to clearly define information on criteria for entry to practice requirements. Create a checklist for applicant identifying the requirements necessary for individual's eligibility to proceed with license application.</li> <li>• Include a detailed description of documentation required.</li> <li>• Identify the recognized language proficiency requirements</li> <li>• Determine the language proficiency assessment/s to be considered acceptable</li> <li>• For comparison and pre-evaluation purposes provide a template defining the competencies from the National Competency Profile that a Respiratory Therapist must possess to ensure license eligibility. Allows for cross-referencing from both the applicant and the licensing body.</li> <li>• Potential to create a link for an online knowledge-based self-assessment.</li> </ul>	<p>✓ ✓ ✓ ✓ ✓</p>	<p>✓     ✓  ✓</p>		

Compliance Issues	MARRT's Planned Actions	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
	<ul style="list-style-type: none"> <li>• Documentation readily accessible to applicants.</li> <li>• Use screen shots of website as much as possible to make the process clear and easy to understand for all license applicants.</li> </ul>	<p>✓</p> <p>✓</p>			
<p>There is a need to ensure systematic communication throughout the registration process.</p>	<ul style="list-style-type: none"> <li>• Template created that triggers acceptance of the application and initializes the chronological record</li> <li>• Template to describe anticipated length of time required for each step to be completed</li> <li>• To ensure continuity of the process and progression of the anticipated timeline all communication between license applicant and licensing body to be time and date stamped</li> <li>• Ensure creation of open file with contact information to enable ongoing two-way communication between MARRT and the applicant</li> </ul>		<p>✓</p> <p>✓</p> <p>✓</p>		

Compliance Issues	MARRT's Planned Actions	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>There is a need to provide information about the MARRT's policies regarding the translation of documents and review documentation requirement to ensure relevance as well as efficiency for applicants.</p>	<ul style="list-style-type: none"> <li>• Supplied documents are translated into official language of the regulatory body. MARRT to specify that requested documentation to be translated into English prior to submission.</li> <li>• Discussion on best practice for translation of submitted credentials</li> <li>• Discussion on flexibility for acceptance of original documents, certificates etc. MARRT to create policy to reflect process.</li> </ul>	<p>✓  ✓  ✓</p>			
<p>There is a need to implement a strategy to verify the authenticity of documents.</p>	<ul style="list-style-type: none"> <li>• Develop procedure for determining/verify authenticity of submitted documents (must be outsourced to government agency as recommended by government of Manitoba). Potential organisations are: Wes (Ontario), IQAS (Alberta), and ICAS ( British Columbia)</li> </ul>	<p>✓</p>			

Compliance Issues	MARRT's Planned Actions	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>There is a need to provide information on qualifications to be assessed, through verification stating accredited educational institution where credential was obtained is recognized by the NARTRB from a curriculum, credential and accreditation perspective.</p>	<ul style="list-style-type: none"> <li>Requires development and access to national database containing educational bodies from around the world and the decision/recommendation on recognition for licensure eligibility</li> </ul>	✓			
<p>There is a need to improve the assessment for Foreign Qualifications.</p>	<ul style="list-style-type: none"> <li>Competency benchmarks to be assessed by 3rd party assessor</li> <li>Cognitive assessment done by 3rd party assessor using the National Competency Profile</li> <li>Psychomotor assessment can be done by 3rd party assessor</li> <li>Create a process to evaluate whether we could partially or fully accommodate the provision of the identified competencies that are required.</li> <li>Communicate with the University of Manitoba to discuss the possibility of integrating the applicants locally. Action: discussion with the University of Manitoba to see if they can accommodate 1 or possibly 2 seats for foreign applicants</li> </ul>			<p>✓</p> <p>✓</p>	

Compliance Issues	MARRT's Planned Actions	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>There is a need to develop policies detailing the process an IERT would follow in their pursuit of recognition and eventual licensure within the profession</p>	<p>Assessment statement is issued to the applicant</p> <ul style="list-style-type: none"> <li>• Policy to track all communication from an archival aspect including all dates and times and outcomes of contacts during the process</li> <li>• Policy required detailing outcome statements in each stage of the process with mechanism for appeal in each stage</li> <li>• Template developed indicating the final recommendation of either full program; bridging program</li> <li>• Policy to include reason for decision if result is negative, and process that applicant is informed of their possibility for appeal</li> <li>• Ensure the appeals process currently in the Act sufficiently meets the requirements of an appeal from the IEHP</li> </ul> <p>Clearly defined next steps and options included with the outcome statement</p>	<p>✓</p> <p>✓</p>			

## Fairness Commissioner's Statement of Compliance

The Manitoba Association of Respiratory Therapist's Action Plan is a constructive response to the registration review. These actions support fair practice and the compliance of its assessment and registration process under *The Fair Registration Practices in Regulated Professions Act*.

We appreciate the seriousness with which the Association has undertaken this self-assessment review. The Association has committed to a very impressive set of actions. The broad range of improvements planned for its information package will be a relatively easy way to better support internationally trained respiratory therapists.

We are impressed by the Association's commitment to explore and implement new assessment strategies and policies, as well as to work with educational partners to ensure local access for assessment and training. This will result in a significant evolution of the Association's practice.

We look forward to a continued positive and fruitful relationship.

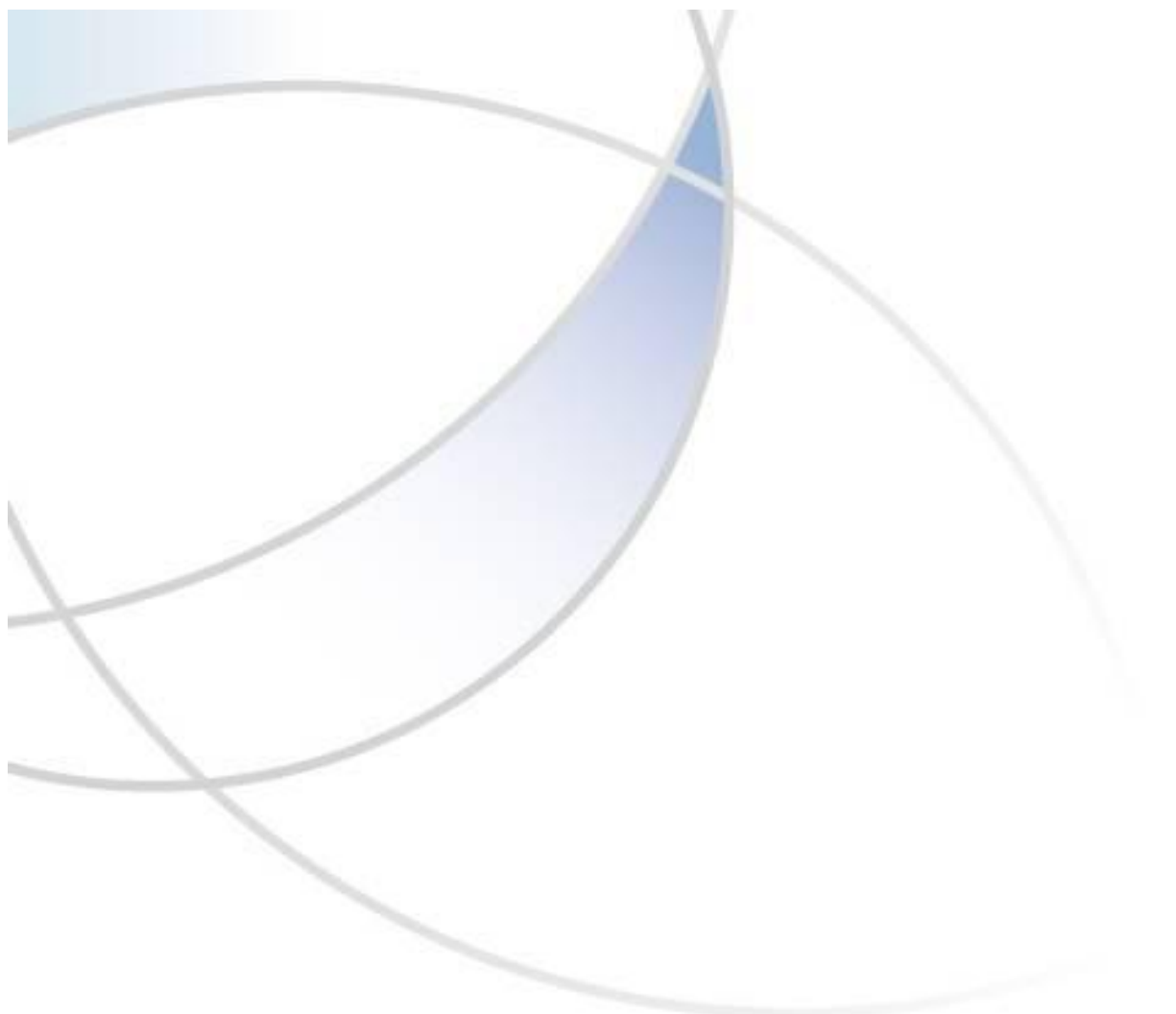


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