

2017 Registration Review Report

College of Pharmacists of Manitoba



OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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Executive Summary

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

Since the last review, CPhM has introduced a number of changes that have positively impacted international pharmacy graduates (IPGs) including adding information to their website to inform individuals of their rights to access their records and the process involved, supporting individuals with their efforts to secure internships, extending the expiration date of a key document, streamlining documentation requirements and providing individualised feedback to applicants needing to repeat the jurisprudence exam.

CPhM also provided input into the development of Pharmacists' Gateway Canada and IPG applicants now benefit from a centralised application process that allows them to track their progress and offers new self-assessment tools to help determine readiness to sit national exams with the Pharmacy Examining Board of Canada.

In December 2013 a new Act was proclaimed changing the name of the Manitoba Pharmaceutical Association to the College of Pharmacists of Manitoba and introducing new practice guidelines that allow pharmacists to play a greater role in supporting the health and well-being of patients while improving accountability and enhancing patient safety. This new Act introduces changes to the internship requirement increasing it from 300 to 600 hours and bringing Manitoba's requirement more in-line with that of other provinces. It also calls for an increase in the educational standard for entry into the profession.

CPhM has committed to taking a leadership role among key stakeholders to implement greater supports for IPGs and internship preceptors. They will also work with the College of Pharmacy at the University of Manitoba to ensure information about the transition to the new educational standard and its implications for IPGs is made public and accessible by IPGs. Finally, CPhM has committed to working with the Pharmacists' Gateway Canada and the Pharmacy Examining Board of Canada to improve our understanding of Manitoba resident IPGs with their first step national certification process.

We anticipate that these planned actions with CPhM's national third parties and other key stakeholders in Manitoba will continue to advance progressive practice in the area of qualifications recognition of internationally educated pharmacists.

Introduction

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

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

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

The 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, CPhM's assessment and registration practice is evaluated in terms of its overall state of fair practice and for the purpose of identifying progress opportunities. This includes an analysis of CPhM's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

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

Context of the Profession in Manitoba

Pharmacists are responsible for medication therapy management of patients and for the safe and legal distribution of prescription and non-prescription drugs to patients and within the healthcare system. This involves advising patients, as well as physicians and other health practitioners, on the selection, dosages, interactions, and side effects of medications.

The Canadian health care system promotes a multidisciplinary, collaborative, patient-centred model of care that has been shown to improve patient safety and health outcomes. Pharmacists and pharmacy technicians work with patients, their families and other health professionals to optimize medication therapy management.

On December 20, 2013, the Manitoba government proclaimed *The Pharmaceutical Act (Act)* (assented to on December 7, 2006) changing the name of the Manitoba Pharmaceutical Association to the College of Pharmacists of Manitoba (the College). The legislative changes and new practice guidelines allow pharmacists to play a greater role in supporting the health and well-being of patients while improving accountability and enhancing patient safety. Pharmacists in Manitoba now have the authority to prescribe and administer certain drugs under limited conditions to better meet the needs of patients. Pharmacists who have undergone training will be allowed to exercise their greater authority to prescribe drugs for self-limiting conditions and smoking cessation and to administer drugs and vaccines by injection. In addition, the new Act recognizes a scope of practice for pharmacy technicians who have met education and training requirements and have received certification through the Pharmacy Examining Board of Canada (PEBC).

Monitoring the safe and effective use of medication for patients distinguishes the Canadian model of pharmacy practice from many other regions in the world where manufacturing, compounding and dispensing of medication is the primary role. Supports for International Pharmacy Graduates (IPGs) to prepare for practice in Canada were provided by a licensed pharmacist with teaching experience with funding through Manitoba Health, Seniors and Active Living from 2011-2016 and for three years prior to this without funding. This programming not only supported success in licensing exams it supported applicants with their transition to practice in Canada, first as interns then as licensed pharmacists. Programming was canceled in October 2016 due to funding cuts. This is a significant loss for IPGs and the profession.

Overview of Assessment and Registration Process

The College currently operates under the authority of *The (Manitoba) Pharmaceutical Act* (C.C.S.M. c. P60) and the Manitoba Pharmaceutical Regulation (185/2013). In order to practice as a pharmacist in Manitoba, individuals must be registered and licensed by the College of Pharmacists of Manitoba (CPhM).

Qualifications

Although CPhM is now also responsible for listing pharmacy technicians, this review will focus only on the assessment and registration process as it pertains to international pharmacy graduates (IPGs). The OMFC will work with CPhM in the future to learn more about its work with pharmacy technicians.

Principal qualifications required for registration as a pharmacist include possessing an approved five-year degree in pharmacy, successfully completing the Pharmacy Examining Board of Canada's (PEBC) Qualifying Exam, demonstrating language proficiency in English or French, successfully completing an internship in Manitoba and passing the CPhM's Jurisprudence Exam.

IPGs must possess educational degrees substantively equivalent to the Canadian standard, and must also undertake the PEBC Evaluating Exam prior to the Qualifying Exam. The PEBC Evaluating Exam is designed specifically to assess the foundational knowledge of the applicant gained through their international education program and assists in determining an IPG's readiness to attempt the Qualifying Exam. As similar educational standards are mutually recognized between Canada and the United States, graduates of the Accreditation Council for Pharmacy Education (ACPE) accredited pharmacy programs are not required to undertake the Evaluating Exam.

The PEBC Qualifying Exam is a two-part exam. Part I is composed of a multiple choice knowledge assessment and Part II is an Objective Structured Clinical Exam (OSCE). The PEBC Qualifying Exam is used to demonstrate an applicant's competence at entry-to-practice.

Application and Assessment Process

The process for registration and licensure for those IPGs who had engaged with the Pharmacy Examining Board of Canada prior to August 20, 2014, continues to follow the path to registration and licensure as considered in the 2012 Office of the Manitoba Fairness Commissioner Registration Review.

For all International Pharmacy Graduate applicants who are undertaking the registration and licensure process in Canada after August 20, 2014, the National Association of Pharmacy Regulatory Authorities (NAPRA) created an interactive website called Pharmacists' Gateway Canada (Gateway). The Gateway streamlines the registration and licensure process and assists applicants in determining if they are prepared for the required national exams with the Pharmacy Examining Board of Canada.

Effective August 20, 2014, all Pharmacy Regulatory Authorities in Canada require candidates that have not yet engaged with PEBC for document evaluation to go through the Pharmacists' Gateway Canada as the first point of access. To help IPGs navigate the licensure process and facilitate their preparation for licensure in Canada, the Gateway provides a website with key information online as well as telephone support. It also features two self-assessment tools which assist IPGs to make informed decisions before starting the process to become licensed as a pharmacist in Canada.

The Gateway presents a simple, transparent and safe way to facilitate the pathway to licensure for IPGs wishing to live and work in Canada. The website provides information regarding the:

- regulation of pharmacy in Canada
- process to obtain a license to practice pharmacy in Canada
- pharmacy practice environment including roles and responsibilities and types of practice
- working conditions for pharmacists such as average salary and hours of work
- potential costs and time required to obtain a license to practice pharmacy in Canada
- average cost of living in Canada – food, lodging, transportation, utilities
- documentation needed to work in Canada – visa, immigration requirements

Step 1 – Apply to the Pharmacy Examining Board of Canada (PEBC) through Pharmacists' Gateway Canada

Application to the PEBC through the Gateway requires the following:

- application fee of \$325
- notarized university degree and transcript directly submitted by the educational institution

- verification of previous registration and letter standing directly submitted by the regulating authority which licensed the applicant. This requirement is waived in the case of recent graduates
- document evaluation fee of \$600

If the applicant is **not** from an ACPE accredited program they must also submit:

- completed evaluating exam application form
- evaluating exam fee of \$535

Step 2 – Write the PEBC Evaluating Exam (applicants from non-accredited programs only)

The Evaluating Exam is a two-part, two half-day multiple choice exam that tests for general academic pharmaceutical knowledge and knowledge of Canadian pharmacy practice. The Evaluating Exam is offered twice a year in the summer and winter. Currently, it can be written in Winnipeg, other major centres across the country and London, England. Three attempts are permitted.

Successful completion of the Evaluating Exam establishes eligibility to challenge the PEBC's Qualifying Exam.

Step 3 – Complete the PEBC Qualifying Exam

The PEBC Qualifying Exam assesses the individual's competence – knowledge, skills and judgment to practice pharmacy safely and effectively in an entry level Canadian pharmacist position. Two half-day multiple choice exams are followed by a full day Objective Structured Clinical Exam (OSCE) which is based on a series of 7-minute simulations of common and critical practice situations.

Synchronized to occur a few months after the Evaluating Exam, the Qualifying Exam is held twice a year in the spring and fall throughout Canada. Locations for the OSCE are restricted in some areas; currently, the OSCE can be challenged in Winnipeg in the spring only.

A completed application and exam fee of \$1,990 is required (Part I – \$415 + Part II OSCE – \$1,575). Three exam attempts are permitted. Passing both Parts I and II of the Qualifying Exam results in a PEBC certificate required for application to Provincial regulators.

Step 4 – Apply to the College of Pharmacists of Manitoba

Upon certification by the PEBC, application is made to CPhM. IPGs must then meet CPhM's assessment and registration process and complete a 600 hour internship under the supervision of a preceptor approved by the College. They must also pass CPhM's Jurisprudence Exam.

PEBC certified IPGs apply to CPhM, completing an application form, paying a \$675 one-time registration fee and supplying the following documentation:

- notarized passport size and style photograph
- notarized copy of birth certificate
- copy of PEBC Qualification Certificate and/or copy of letter from the PEBC confirming qualification
- for applicants from non-ACPE accredited programs, English or French language proficiency assessment scores directly submitted from a testing organization that meets minimum proficiency requirements as determined by the National Association of Pharmacy Regulatory Authorities (NAPRA) *
- notarized copy of Canadian Citizenship or Permanent Resident Status
- verification of previous registration and letter of standing directly submitted from regulating authority or a directly submitted statement from the PEBC attesting to this documentation, if document submitted to the Gateway is no longer current (document subject to 24 month expiry policy). This requirement is waived in the case of recent graduates
- a notarized declaration from the applicant, stating that in Manitoba or anywhere in the world, the applicant:
 - is not under suspension or investigation by any health profession regulatory body governing the practice of pharmacy in Canada or another country
 - has not been denied an application to practice as a health care professional
 - has not been disciplined by another regulatory body responsible for the regulation of pharmacists or another health profession
 - currently has, or previously has had no conditions placed on his/her ability to engage in the practice of a health profession
 - has not been found civilly liable for professional negligence or malpractice in relation to the practice of a health profession
 - is not currently the subject of proceedings with respect to a criminal offence or an offence under an Act regulating the practice of pharmacists or related to the sale of drugs
 - does not suffer from a physical or mental condition, including an addiction to alcohol or drugs that may interfere with his/her ability to practice in a safe and effective manner
 - does not have past conduct that would provide grounds for belief that he/she will not engage in the practice competently and with decency, integrity and honesty and in accordance with the law
- a Criminal Records Check from a Canadian police service
- a Child Abuse Registry check under the *Child and Family Services Act* (Manitoba)
- an Adult Abuse Registry check under the *Adult Abuse Registry Act* (Manitoba)

The College's Registrar and Board of Examiners review and approve applications for registration and licensure.

*Applicants who completed four years of secondary studies primarily in English in Canada before completing their pharmacy education at a non-ACPE accredited program may be exempt from submitting proof of language proficiency.

Step 5 – Complete an Internship

Approved applicants must successfully complete a 600 hour internship with a preceptor approved by CPhM. It is the responsibility of the applicant to secure a preceptor. The internship must be completed within the range of 15 to 21 weeks and involves three preceptor assessments based on NAPRA's Model Standards of Practice for Canadian Pharmacists.

There is no employment requirement for the internship. If employed as a pharmacy staff member, many IPGs will arrange their internship with a preceptor with a return of service agreement to work as a pharmacist for a period after licensure.

Step 6 – Write the Jurisprudence Examination

After 200 hours of internship have been successfully served, applicants are eligible to write the College's Jurisprudence Exam. This three-hour, multiple format exam tests for legal and profession-specific knowledge about ethics, legislation, standards of practice and the role of pharmacists in Manitoba. The fee is \$174. Staff at CPhM performs a personal review of the College's Jurisprudence Exam with IPGs in cases of an exam failure in order to support IPGs and help them prepare for their subsequent attempt. In Manitoba, unlike with other Pharmacy Regulatory Authorities in Canada, there is no limit to the number of attempts one can take to pass the Jurisprudence Exam.

Once all the above requirements are met, applicants pay a license fee of \$934 and with the approval of the College's Board of Examiners and the College Registrar, are licensed.

Appeals

CPhM's registration and assessment decisions – application, internship assessments, and jurisprudence exam – are subject to appeal. Appeals are heard by CPhM's Council members, independent of the Board of Examiners and the registrar responsible for original registration and assessment decisions. For the Evaluating and Qualifying Exams, the PEBC provides the opportunity for rescoring reviews and in circumstances of ill health, applicants can petition for no standing status.

Time and Cost

The time and cost for IPGs to be assessed and register as a pharmacist varies depending on the circumstance of the applicant.

For an IPG who is able to collect and provide all the required documents, whose credentials qualify them for assessment, and who is successful on the first challenge of the PEBC and CPhM's exams, the entire process will take a minimum of 19.5 months. This range involves approximately 10-15 months to obtain a PEBC certificate and 4.5 months to complete the CPhM's licensing requirements.

The direct costs for both the PEBC and CPhM examinations and requirements will total approximately \$5,232 including the practicing license fee for applicants from non-ACPE accredited programs and approximately \$4,697 for applicants from ACPE accredited programs. There may also be costs associated with providing documentation and language proficiency testing.

These timeframes and costs represent best case scenarios.

Specific Costs:

PEBC/Gateway:

Gateway Application Fee	\$325
Document Evaluation Fee	\$600
Evaluating Exam Fee	\$535
Qualifying Exam Part I	\$415
Qualifying Exam Part II (OSCE)	\$1,575

CPhM:

CPhM Registration Fee	\$675
Jurisprudence Exam	\$173
CPhM Licensing Fee	\$934

State of Progress

The College of Pharmacists of Manitoba has demonstrated a commitment to the fair assessment and recognition of international pharmacy graduates (IPGs).

Many aspects of CPhM's registration practice for IPGs are progressive and reflect CPhM's steps to improve its practice since the 2012 Registration Review.

CPhM has:

- made clear on its website the possibility of submitting alternative documentation as well as applicants' right to access their records and the processes involved in doing so
- requested that PEBC expand information on its website regarding alternative documentation and the process involved in providing it
- provided input into the development of Pharmacists' Gateway Canada and helped to ensure applicants are able to access their records
- posted a directory of licensed pharmacies in Manitoba including names and contact information of the managing pharmacists, and added links to sites with pharmacy job postings to support IPGs in their efforts to secure internships
- worked with PEBC to extend the six month expiration dating of the previous registration document to 24 months

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

Timely Registration

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

In August 2014, Pharmacists' Gateway Canada was introduced as a centralised source of information on the licensure process for IPGs and document repository for the PEBC and for provincial regulatory authorities. Once documents are collected by the Gateway they are not requested again by CPhM unless they have expired.

The Gateway offers two self-assessment tools to help IPGs better understand the Canadian licensing process and the pharmacy work environment. They are also intended to help IPGs identify areas of pharmacy practice where they need more education and experience.

The Evaluating Exam is offered two times per year, in the winter and summer and is synchronised to precede the Qualifying Exam which is offered in the spring and fall. This means that once the Evaluating Exam has been successfully completed, applicants can move quickly to sit the Qualifying Exam. The Evaluating Exam can also be written in London, England. Frequency of exam delivery and pre-migration options for sitting exams supports efficiency of the certification process.

In July 2015, CPhM introduced a limit to the number of IPG applications reviewed each month. Any applications beyond five in one month are placed in a queue. They are processed in the order in which they were received not to exceed five per month unless an exception is granted by the Registrar. A pharmacy manager may request special consideration of an IPG and that an exception be granted. This policy was put in place to more effectively manage the workflow at CPhM particularly immediately following the release of national exam results. To date it has not impacted the timeliness of registration of Manitoba IPGs.

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

The national Language proficiency requirements are reviewed every two years by NAPRA.

CPhM reports that Pharmacists' Gateway Canada, the pharmacy regulatory authorities (PRAs) and PEBC meet regularly to discuss ways to expedite the input of data into the Gateway to ensure that the candidates and the PRAs have the most up to date information. PEBC has also updated the delivery of Part I of the Qualifying Exam by moving to a computer based model. The exam will be a single day exam, offered over six days, up to three times a day, in at least 17 cities.

CPhM's assessment and registration process is reviewed to ensure timeliness for IPGs on an ongoing basis at Council meetings.

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

IPGs can monitor their progress as they advance through the PEBC certification requirements through a personal, confidential Gateway account. They can see which documents have been received and when. They can also access their exam results in a timely manner following their exams.

The PEBC acknowledges receipt of applications by way of an email within four weeks of receiving an application. Application results are also sent within this timeframe.

Those who are not successful on the Evaluating and Qualifying exams receive a feedback report within four to eight weeks of results being released. This feedback is meant to help applicants better understand their areas of weakness on exams.

Communication with applicants by CPhM is also timely and systematic. If CPhM's application limit of five has been reached in a given month, applicants are notified that their application will not be reviewed and assessed in the month in which it is received and they are informed in writing by the registration officer of the month in which it will be assessed.

Relational fairness could be further enhanced by also including in their correspondence information about the opportunity to ask a potential preceptor to request a quicker assessment in cases where the application assessment is delayed due to application volume. This information is currently posted on CPhM's website only.

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).

CPhM indicates that for IPGs who are successful on the first challenge of the PEBC and CPhM's exams, the entire process will take a minimum of 19.5 months. This includes time dedicated to administrative and regulatory review of applicant files as well as assessment of jurisprudence exams.

IPGs who are successful on the first sittings of the national exams can be working as interns in Manitoba soon after one year of initial application.

Recognition of Professional Work Experience

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

Neither PEBC nor CPhM consider professional work experience in their assessment of IPGs to supplement the assessment of academic qualifications; reduce or waive exams and assessment requirements; or shorten or waive internship requirements.

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

The OSCE examination required by the PEBC allows individuals to demonstrate skills acquired through professional education and work. The 600 hour supervised internship also allows for this. Both are progressive practices.

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

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

Supervised Practice Opportunities

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

Prior to licensure, CPhM requires IPGs to complete a 600 hour internship in a licensed pharmacy under the supervision of an approved preceptor. This requirement was increased from 360 hours in January 2014 as a result of legislative changes and brings the requirement more in line with that of other provincial regulatory authorities for all interns including those completing Canadian pharmacy programs.

A minimum of 120 hours must be served in a pharmacy that has direct contact with patients. As such, internships provide opportunities for IPGs to gain exposure to clinical experiences, to have contact with patients in a Canadian pharmacy practice and to work with other licensed pharmacists. Internships also provide an opportunity for IPGs to collaborate professionally and to work in teams.

Interns are expected to develop a learning plan and they must self-assess at the beginning, middle and end of their internship. Assessment reports are also completed at regulator intervals by preceptors. Preceptors are pharmacists with no less than two years experience working as licensed pharmacists in Canada.

A 99 page internship manual is provided to interns and preceptors. This internship manual outlines the procedures, assignments and evaluation

procedures for the program. It contains an orientation checklist as well as scenarios and questions for discussion between the preceptor and the intern within the context of the practice site. This manual helps both preceptors and interns understand what is expected of them and it helps guide the process. This is a promising practice.

Interns pass the internship on the recommendation of their preceptor. They have the right to appeal a negative decision by their preceptor and to have their appeal heard by CPhM's Council.

CPhM has provided training workshops for preceptors and had plans to post an online version of their workshop on their website to encourage pharmacists to serve as preceptors. There is also a dedicated webpage for preceptors on CPhM's website that provides information and resources. Available through this page is an online preceptor education program developed by an inter-professional group from the University of British Columbia. Modules include enhancing your teaching skills, fostering clinical reasoning, providing feedback, evaluation, supporting the struggling student, and handling conflict. A similar eLearning course is offered by Dalhousie University.

CPhM is currently meeting with faculty from the College of Pharmacy, University of Manitoba, to discuss additional supports for its preceptors.

To assist IPGs in securing an internship in Manitoba, CPhM provides a directory of all licensed pharmacies in the province which includes the managing pharmacist's contact information. They also provide a link to Pharmacists Manitoba and the Canadian Society of Hospital Pharmacists for current job postings.

Additional Fairness Concerns

No concerns at this time.

Progress Opportunities

1. Working with key stakeholders, advocate for implementation of an IPG supports program and opportunities to support IPGs in practice.
2. Improve supports for preceptors working with IPG interns.
3. Work with stakeholders to ensure information regarding the transition to the PharmD educational standard and its implications for IPGs is public and accessible by IPGs.
4. Engage with PEBC to obtain data to improve understanding of Manitoba IPG's experience in the national certification process.

Fairness Commissioner's Recommendation

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

College of Pharmacists of Manitoba – Action Plan

In response to the Fairness Commissioner’s recommendation, CPhM proposed the following Action Plan as of May 2017

CPhM’s Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2017 Registration Review to discuss implementation of activities and updates to the Action Plan. Action Plan updates will be posted on the OMFC’s website on an annual basis, following these meetings allowing any interested party to see the progress to date.

Progress Opportunity	Action(s)	Completion Date
<p>1. Working with key stakeholders, advocate for implementation of an IPG supports program and opportunities to support IPGs in practice.</p>	<p>CPhM will continue working with the College of Pharmacy, University of Manitoba, as well as with Government for development opportunities in conjunction with the OMFC in order to garner support for the implementation of an IPG supports program and opportunities to support IPGs in practice in the Canadian Health Care system.</p>	<p>Ongoing</p>
<p>2. Improve supports for preceptors working with IPG interns.</p>	<p>CPhM has already had an initial meeting with the College of Pharmacy, University of Manitoba, to discuss preceptor training programs and ways in which to support preceptors for the current university program. These actions will ultimately pave the way for improving the work in supporting IPG interns.</p>	<p>Ongoing</p>
<p>3. Work with stakeholders to ensure information regarding the transition to the PharmD educational standard and its implications for IPGs is public and accessible by IPGs.</p>	<p>Once all programs are developed by the College of Pharmacy, and then approved by the Board of Governors at the University of Manitoba and become available, CPhM will work with the College of Pharmacy to ensure information regarding the transition to the PharmD educational standard and its implications for IPGs is public and accessible by IPGs.</p>	<p>September 2017</p>

Progress Opportunity	Action(s)	Completion Date
<p>4. Engage with PEBC to obtain data to improve understanding of Manitoba IPG's experience in the national certification process.</p>	<p>CPhM will engage with NAPRA's Pharmacists' Gateway Canada and PEBC to identify collectible data fields. Once data fields are known, and data has been analyzed, CPhM will meet with OMFC to review findings.</p>	<p>August 2017</p>

Statement of Compliance

The College of Pharmacists of Manitoba's Action Plan is a very progressive response to the progress opportunities identified in this review. These actions will help ensure and improve fair practice for the assessment and registration of international pharmacy graduates (IPGs) and are consistent with the intent of *The Fair Registration Practices in Regulated Professions Act*.

The College of Pharmacists of Manitoba continues to demonstrate a strong commitment to positive professional outcomes for IPG applicants. They have a hard working, conscientious team and strong leadership who take the issue of fair practices seriously and strive to make effective change happen.

I look forward to working with CPhM to better understand the experience of Manitoba resident IPGs with the first step of their assessment with their national body.

I am optimistic that the commitments outlined in this Action Plan will maximise the contribution of IPGs in the Canadian healthcare system.



Ximena Munoz
Manitoba Fairness Commissioner

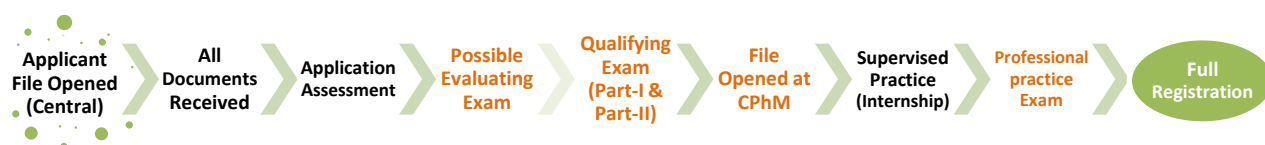
Appendix I: Report on 2011-2015 Registration Data

The College of Pharmacists of Manitoba reports annually to OMFC on the registration of international pharmacy graduates to Manitoba. The OMFC will continue to work with CPhM on the collection of registration data including the collection of relevant data from NAPRA's Pharmacists' Gateway Canada and the Pharmacy Examining Board of Canada.

CPhM received 660 total applications from 2011-2015. Among those, 284 or 43% were internationally educated applicants (IEAs).

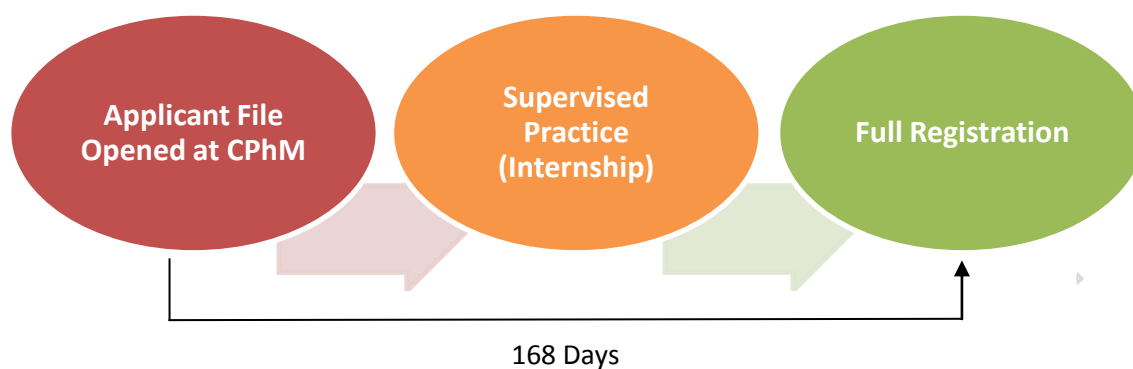
Those 284 IEAs had education from 26 different countries. The top country of education was Egypt with over 42% of applicants. Indian, Philippines, United Kingdom and Jordan educated 25%, 4.9% and 3.9% of applicants, respectively.

With regard to licensure outcomes, 75% of the 284 IEAs obtained full registrations by the end of 2015. The remaining applicants had withdrawn or been rejected or were still in process.



For those 212 that obtained full registration, the average time to do so upon applicant file opened by CPhM was 168 calendar days, or approximately 5.5 months. This timeline does not include the time it takes to apply to Pharmacists' Gateway Canada for credentialing and to complete the initial requirements which precede application to CPhM.

Average Time to Full Registration



The shortest time from when an IEA's file was opened by CPhM to when full registration was obtained was just over two months, while the longest time was 16 months.

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

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

Year	Landings
2011	28
2012	31
2013	24
2014	38
2015	34
Totals	155

The NOC code associated with these landings is 3131 Pharmacists.

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

Appendix II: 2017 Registration Review Process

The OMFC's 2017 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"> CPhM's report on its fair practice progress Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities Progress opportunities identified Recommendation from Fairness Commissioner to address progress opportunities 	March 30, 2017
Progress Meeting	<ul style="list-style-type: none"> CPhM and Fairness Commissioner discuss report and possible actions CPhM is considering addressing progress opportunities 	April 13, 2017
CPhM Action Plan	<ul style="list-style-type: none"> CPhM's Action Plan submitted to OMFC 	May 12, 2017
2017 Registration Review Report	<ul style="list-style-type: none"> Report submitted to CPhM Report contains the review findings, CPhM's Action Plan, and the Fairness Commissioner's Compliance Statement 	May 19, 2017
Registration Review Closeout Meeting	<ul style="list-style-type: none"> CPhM and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how CPhM's action plan will inform the relationship moving forward Registration Review Report submitted to Minister of Education and Training, the Minister of Health, Seniors and Active Living and uploaded on OMFC website 	June 9, 2017

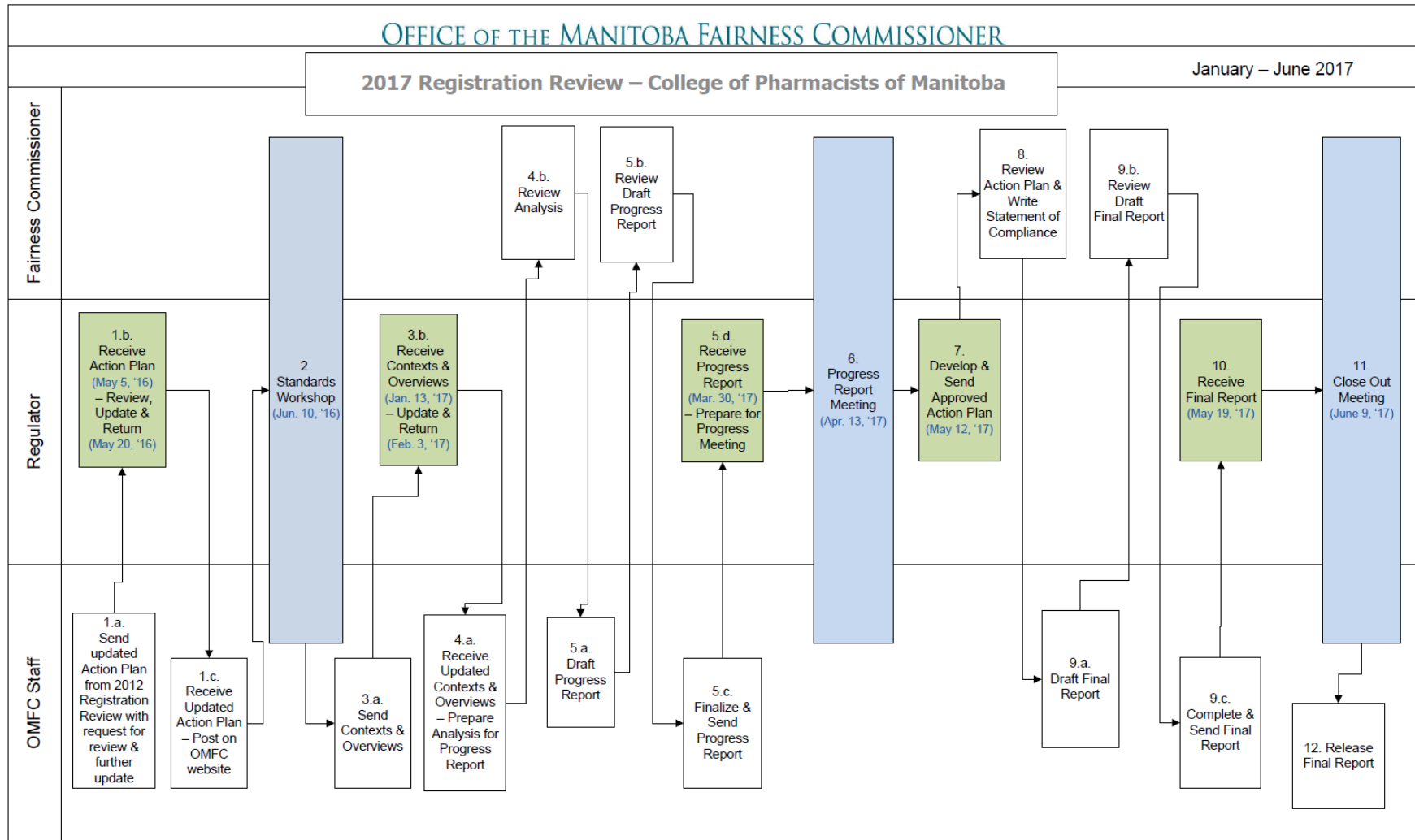
Review participants:

Susan Lessard-Friesen, Registrar, CPhM
 Todd Mereniuk, Deputy Registrar, CPhM
 Kathy Klimasara, Executive Assistant to the Registrar, CPhM
 Bev Robinson, Registration Officer, CPhM
 Dinah Santos, Councillor, CPhM Council

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

2017 Registration Review – College of Pharmacists of Manitoba

January – June 2017





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