











Action Plan: College of Pharmacists of Manitoba (CPhM)

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In response to the Fairness Commissioner's Recommendations, the College of Pharmacists of Manitoba proposed the following action plan as of July 2012.

| OMFC Recommendations | Action Plan | Status as of May 2016 |
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| 1. With regard to the assessment and registration information: | | |
| a. CPhM make clear in its registration information the possibility of alternative documentation and the process involved; | CPhM will make clear in its registration information posted on the CPhM website and provided by email the possibility of alternative documentation and the process involved. |  Sept. 2012 |
| b. CPhM make clear in its registration information an applicant's access to records and the procedure whereby records are accessed; | CPhM will make clear in its registration information posted on the CPhM website and provided by email an applicant's access to records and the procedure whereby records are accessed. |  Jan. 2014 |
| c. CPhM contact the PEBC and request: | | |
| i. That PEBC information make clear the opportunity for alternative documentation and the process involved; | <p>PEBC Document Evaluation processes are standardized yet flexible to permit verification alternatives if there are circumstances such as war, strife or other reasons that prohibit the candidate from obtaining academic or other pertinent documentation. Candidates who report difficulties in getting their documentation are advised by the Document Evaluation staff regarding the following alternative process:</p> <ul style="list-style-type: none"> • Candidates must make a statutory declaration stating why they are unable to provide the required documents; and, • The PEBC requires certified statements from three Canadian or US-licensed pharmacists, stating the length of time they have known the candidate and confirming that the candidate graduated from their same school of study. In some instances, certified statements from one of their professors have been accepted. <p>The opportunity for alternative documentation and the process involved is currently provided only as it relates to identification on the PEBC website here e.g., see section "If you are unable to submit the required identification". CPhM will request that PEBC expand the information on its website regarding alternative documentation and the process involved.</p> |  Nov. 2012 |
| ii. That PEBC information make clear an applicant's access to records and the procedure whereby records can be accessed; | CPhM will request that PEBC make clear in its information posted on its website an applicant's access to records and the procedure whereby records can be accessed. |  Aug. 2014 |

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| 2. That CPhM's expiration policies for language tests be reconsidered in cases where the applicant, subsequent to the language test, has lived, worked or studied in an English or French environment; | In preparation, CPhM requests that the OMFC provide evidence to support the notion that an applicant's language proficiency will improve based on the length of time that the applicant has lived, worked or studied in an English or French environment and language proficiency assessment tools used by other regulatory bodies in these situations. CPhM will then direct the Board of Examiners to reconsider CPhM's expiration policies for language tests in cases where the applicant, subsequent to the language test, has lived, worked or studied in an English or French environment. |  Jan. 2015 |
| 3. That CPhM better streamline its documentation requirements for IPGs by recognizing the PEBC's documentation assessment with regard to previous registration, no longer requiring IPGs to arrange for the PEBC to submit this documentation or seeking it again from the applicant's previous regulator; | CPhM currently recognizes PEBC's documentation assessment with regard to previous registration and will direct the Board of Examiners to consider no longer requiring IPGs to arrange for the PEBC to submit this documentation. However, in situations where an applicant has returned to his country of origin to practice for a period of time during the PEBC registration process, a current letter of standing from the applicant's regulator will be required. In addition, with introduction of NAPRA's IPG Gateway to Canada Project scheduled for spring 2013, applications and documentation will feed into a national shared database which will be accessible to all provincial pharmacy regulators. |  Aug. 2014 |
| 4. That CPhM accommodate IPGs seeking internships by co-ordinating and providing information about internship opportunities; | <p>IPG applicants are responsible for securing a licensed practicing pharmacist willing to serve as their preceptor who is eligible to be approved by Council as a preceptor. Currently CPhM does direct IPG applicants to the contact information listed in the Directory of Licensed Pharmacies to assist in securing a preceptor. In addition, CPhM has provided training workshops for preceptors and plans to post an online version of this workshop on the CPhM website to encourage pharmacists to serve as preceptors.</p> <p>It is not within the mandate of CPhM to provide employment opportunities for pharmacists and these services are offered by the advocacy groups for pharmacists in this province, the Canadian Society of Hospital Pharmacists-Manitoba Branch (CSHP-MB) and the Manitoba Society of Pharmacists (MSP). CPhM is aware that at times when there is an opening for a pharmacist position at a pharmacy, pharmacists at this site may be more willing to serve as a preceptor for an applicant who agrees to continue to work at this pharmacy following licensing. CPhM will therefore, also direct IPGs seeking preceptors and internship sites to the CSHP-MB and MSP for possible future employment opportunities. CPhM will post this information on our website, provide links to the CSHP-MB and MSP websites and include this information in our communication to applicants about the internship program.</p> |  Jan. 2014 |
| 5. That CPhM contact the PEBC to ensure that the PEBC's eligibility assessment, Evaluating Exam and Qualifying Exam are subject to full and fair appeal and to request that complete and accurate appeal information be provided on the PEBC's website, and that this information accompany result letters; | <p>A structured PEBC appeal process is already in place and has been shared with the OMFC office. The PEBC has confirmed that any aspect of the PEBC examination process, including eligibility assessment for the Evaluating Exam and the Qualifying Exam, may be appealed using this process. CPhM agrees to request the PEBC consider ways to make information regarding an applicant's ability to appeal the eligibility assessment for PEBC exams clearer by including this information on the PEBC website and in correspondence to applicants who have been unsuccessful in meeting the eligibility assessment.</p> <p>CPhM has raised the issue with PEBC of applicants not being able to appeal the content of the Evaluating Exam and the Qualifying Exams. We have been informed by the PEBC that due to the nature of these high-stakes examinations for professional certification, the PEBC is not able to allow candidates to request a full review of their performance in an examination. Such a review would compromise the integrity and security of the examination content, as candidates would be allowed to revisit examination material and be exposed to correct answers or expected responses. This type of review would</p> |  Nov. 2012 |

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| | <p>prohibit any exposed examination content from being used again on a future examination and thereby significantly increase costs associated with examination content development. The examination content of the PEBC Evaluating and Qualifying Examinations has undergone rigorous pre-testing, including psychometric analysis and is audited, to determine relevance and validity.</p> | |
| <p>6. That CPhM contact the PEBC to request the 6 month expiration dating applied to previous registration documentation be extended for applicants whose circumstances so warrant;</p> | <p>CPhM agrees to contact the PEBC to discuss possible options to the 6-month expiration dating applied to previous registration documentation for applicants whose circumstances so warrant. CPhM will request the OMFC's assistance in providing best practice models in support of this recommendation that may be in use by other regulators of a health profession.</p> | <p> Nov. 2012</p> |
| <p>7. CPhM contact the PEBC to request both a review of the relevance and necessity of the Evaluating Exam and a consideration of alternative eligibility routes for IPGs to challenge the Qualifying Exams.</p> | <p>The PEBC Evaluating Exam is designed to determine if a candidate has the knowledge and skills comparable to a graduate from a CCAPP-accredited program. It evaluates the candidate's knowledge and skills in required areas of current pharmaceutical education and has been used by the PEBC since the late 1980's as a comparability determination tool for the educational preparation of all IPGs (with the exception of those educated in the US).</p> <p>Prior to 1987 IPGs were permitted to directly challenge the PEBC Qualifying Exam after validation in the Document Evaluation process, which included upgrading of any curricular deficiencies with Canadian university courses. However, the PEBC soon recognized that, while the Document Evaluation process could confirm the authenticity, legitimacy or existence of bona fide universities and pharmacy schools internationally, it could not provide a good qualitative or quantitative measure of the actual academic preparation in pharmacy (learning outcomes) attained by each IPG. The Evaluating Exam was therefore implemented to provide an efficient, yet comprehensive, objective and standardized approach to determining IPGs' preparedness to sit the Qualifying Exams.</p> <p>If the Evaluating Exam were not to be used, the Document Evaluation process would take considerably longer to complete in order to determine educational comparability and if potential deficiencies were identified in a pharmacy program, it would be necessary for the applicant to enrol in certain university pharmacy courses to upgrade their education. This approach would not only be considerably more time consuming but, also more costly for both the IPG applicant and CPhM as the provincial regulatory body for licensing.</p> <p>The PEBC Evaluating Exam is considered a cost-effective approach to determining the educational preparation of IPGs by all provincial pharmacy regulatory authorities in Canada. As well, we all look forward to implementation of NAPRA's Gateway to Canada Project that will further assist IPGs, through the use of self-assessment tools, to prepare for registration and licensure in Canada.</p> <p>While CPhM is willing to comply with the OMFC's recommendation to request the PEBC conduct a review of the relevance and necessity of the Evaluating Exam and consider alternative eligibility routes for IPGs to challenge the Qualifying Exams, it is our opinion that such actions have occurred repeatedly and on an on-going basis throughout the 40-year history of the PEBC. However, CPhM will be willing to co-author a letter to the Minister of Health and the Minister of Education to explore the possibility of creating a centre of excellence in Manitoba for all professions to enable document evaluation and prior learning assessment to achieve the same goals currently being accomplished through the PEBC Evaluating Exam.</p> | <p> Nov. 2012</p> |