



# **OMFC REGISTRATION REVIEW**

**Manitoba Dental Association  
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 Dental Association (MDA) as of July 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. Two senses of compliance are at work in the legislation. First and foremost, it refers to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants. Secondly, it 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. 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 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.

The OMFC undertook a registration review with the MDA between March and July of 2013 (see appendices A & B). Several meetings were involved, documentation was gathered and reviewed, field work was conducted and the MDA provided an Action Plan in response to the Fairness Commissioner's recommendations. The MDA's Action Plan, as well as the OMFC'S review findings and the Fairness Commissioner's recommendations follow throughout this report.






## Registration Review Process

The OMFC's multi-step review process has several key phases: agreeing to a review schedule, documenting and understanding, evaluating and drafting the findings and recommendations, and achieving an action plan to move things forward. The process is designed to support meaningful reviews that concretely identify fairness issues and lead to progressive change.

### The Fairness Standard and Criteria Document

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For the purposes of the 2012/2013 registration review cycle, regulatory practice is evaluated against a single, broad fairness standard: ***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.*** In the Fairness Standard and Criteria Document, this fairness standard is defined by 14 elements, each further differentiated into one or more criteria.

For each criterion in the 'Fairness Standard and Criteria Document', green, yellow, and red check marks --    -- designate whether evidence is found indicating compliance, needs improvement, or non-compliance. Practices identified as needing improvement or non-compliant --  or  -- are followed by an analysis that explains the finding.

### Recommendations, Action Plan & Compliance Statement

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The Fairness Commissioner makes recommendations based on a consideration of the issues of non-compliance and areas that show opportunity for improvement. These are identified and explained in the 'Fairness Standard and Criteria Document' completed for the regulator.

The action plan, in turn, is drafted by regulators to respond to the Fairness Commissioner's recommendations. For each of the Fairness Commissioner's recommendations, regulators reply with a plan to address the concern as well as a timeline for the execution of the plan. Regulators are given opportunity to remark upon any recommendation made by the Fairness Commissioner.

Finally, 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.

### OMFC Support

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Addressing problematic practice can pose considerable challenges for regulators. No remedy may be readily at hand; third-parties may be involved; resources and expertise may be wanting. In these circumstances, the OMFC is committed to working with regulators to support and assist the development of innovative solutions and better practice.

## The Dentistry Profession in Manitoba

Dentists are primary care providers for patient oral health. They are responsible for the diagnosis, treatment, management and overall coordination of services to meet oral health needs. Common treatment activities include preventative, restorative and surgical care. Dental specialists are practitioners with training at a graduate level in a recognized area of dentistry providing additional expertise in the diagnosis and management of certain oral health conditions.

In Manitoba, a number of practitioners are internationally educated. This culturally diverse group of practitioners helps serve Manitoba's increasingly diverse population. A quarter of the seats at the University of Manitoba's Faculty of Dentistry are set aside for Internationally Educated Dentists (IEDs) in its International Dental Degree Program.

In addition to their contribution in the field, the Manitoba Dental Association (MDA) reports that IEDs also play an important role filling academic faculty positions supporting a vibrant dental training program at the Faculty of Dentistry.

Demand for dental services in the province is strong, especially in northern communities. In a response to improve access to care in underserved areas, the MDA implemented a mentorship program to increase awareness of opportunities in rural and remote areas of the Province by recent graduates. The program is successful and has improved access to dental services in many rural communities. Remote communities still remain a challenge.

## The Profession of Dental Assisting in Manitoba

Dental assistants provide important services and support in oral health care. Most dental assistants work alongside dentists in dental clinics. They perform many tasks requiring both interpersonal and technical skills including the promotion of oral health.

A number of internationally educated oral health care providers are registered as dental assistants in the Province.

Dental assistants are self-regulated and registered as associate members of the MDA. In Manitoba all dental assistants using the title of Registered Dental Assistant must be licensed with the MDA.

## Overview of the Assessment and Registration Process of the Manitoba Dental Association

The Manitoba Dental Association (MDA) operates under the authority of *The Dental Association Act* (C.C.S.M. c. D30) and the Manitoba Dental Association By-Laws. Under *The Dental Association Act*, to practice dentistry, a dental specialty or as a dental assistant and use the respective titles of Dentist, Dental Specialist or Registered Dental Assistant, individuals must be registered with the MDA.

### Qualifications

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#### **General Dentist**

Principal qualifications required for registration as a general dentist include graduation from a dental training program and a certificate from the National Dental Examining Board of Canada's (NDEB) demonstrating successful completion of their Written and Objective Structured Clinical Examinations (National Exam & OSCE).

Graduates of programs accredited by the Commission on Dental Accreditation of Canada (CDAC) or programs accredited by organizations in which CDAC has reciprocal recognition agreements are eligible to apply for the National Exam and OSCE. CDAC has reciprocal agreements with national accrediting bodies in the United States, New Zealand, Ireland and Australia.

In order for graduates of non-accredited dental training programs to apply for the NDEB National Exam and OSCE, they must first successfully complete a recognized assessment process. The individual must successfully complete the NDEB Equivalency Process, dental degree completion program at an accredited Canadian university or an accredited dental training program. A prerequisite for application to a dental degree completion program is completion of the NDEB Assessment of Fundamental Knowledge (AFK).

#### **Dental Specialist**

Principal qualifications required for registration as a dental specialist include graduation from a dental specialty training program and successful completion of the National Dental Specialty Examination (NDSE) administered by the Royal College of Dentists of Canada (RCDC).

Graduates of programs accredited by CDAC or programs accredited by organizations in which CDAC has reciprocal recognition agreements are eligible to apply for the NDSE. CDAC has a reciprocal agreement for dental specialty training programs with the national accrediting bodies in the United States.

In order for graduates of non-accredited dental specialty programs to apply for the NDSE, they must first successfully complete a recognized assessment process. The individual must successfully complete a Dental Specialist Assessment and Training program (DSATP) at an accredited dental specialty training program or an accredited dental specialty training program. A prerequisite for application to a DSATP is the NDEB Dental Specialty Core Knowledge Exam.



### ***Dental Assistant***

Principal qualifications required for registration as a dental assistant include graduation from an appropriate allied dental health care training program and a certificate from the National Dental Assisting Examining Board of Canada's (NDAEB) demonstrating successful completion of their written examination.

Graduates of programs accredited by the Commission on Dental Accreditation of Canada (CDAC) or programs accredited by organizations in which CDAC has reciprocal recognition agreements are eligible to apply for the written examination. CDAC has reciprocal agreements with national accrediting bodies in the United States.

In order for graduates of non-accredited allied dental healthcare training programs to apply for NDAEB certification, they must first demonstrate their formal education including training in certain mandatory skills. Once demonstrated, the applicant must successfully complete the written examination and a Clinical Practice Evaluation (CPE) in order to receive the NDAEB certificate.

### **Assessment and Registration Process: General Dentist**

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Assessment and registration is a two step process: first being assessed and certified by the National Dental Examining Board (NDEB) and then applying and registering with the MDA.

#### ***1) National Dental Examining Board of Canada Certification***

Applicants first apply to the NDEB online, supplying name of the dental program they completed, the date of completion, contact information and photo ID. These are the only initial documentation requirements. Application fee for the National Exam & OSCE is \$500.00. Application fee for the Equivalency Process is \$800.00.

Graduates of accredited programs, proceed to write the NDEB National Exam & OSCE. The written exam occurs in one day and consists of a morning and afternoon session each with 150 multiple choice type questions. The written exam fee is \$800.00. The OSCE examination also takes one full day to complete and consists of simulated case stations of 5 minutes duration each. The OSCE fee is \$900.00.

The National Exam & OSCE are conducted at Canadian dentistry faculties and offered twice annually in February or March. In November or December undertakings are offered at several exam locations provided there is an expectation of a minimum of 25 participants at a location. If less than 25 candidates register at a centre, candidates may be transferred to another centre.

According to Board policy, the NDEB may establish National and OSCE Examination centres outside of Canada. These identified locations must have acceptable security and an expectation of a minimum of 50 candidates.

The NDEB will try to accommodate location preferences but may have to offer alternative locations due to space limitation at some examination locations.

The NDEB supplies preparation material for both exams. In addition to releasing all the written examination questions on its website, the NDEB also provides an Examination Blueprint for the written exam and a Question and Answer Framework for the OSCE.

Applicants are informed within 3 to 6 weeks of their exam results. Successful applicants receive NDEB certification and can proceed to apply to the MDA. A candidate has a maximum of three attempts to successfully complete either the National Examination or OSCE.

To be eligible to write the National Exam & OSCE, graduates of non-accredited academic programs must successfully complete the NDEB Equivalency Process, a two-year completion program at an accredited Canadian dentistry faculty or an accredited dental training program.

### ***NDEB Equivalency Process***

The Equivalency Process is comprised of three assessments intended to evaluate and confirm the substantive equivalence of the individual's dental knowledge and skills to that provided by an accredited Canadian dentistry program.

The AFK is a full day, multiple choice format assessment that tests for basic and universal dentistry knowledge. The exam fee is \$700.00 and the exam is offered annually in February. A test equated passing score of 75 or higher is required to be eligible to register for the Assessment of Clinical Skills (ACS) and the Assessment of Clinical Judgment (ACJ). All of the exams in the Equivalency Process can be taken three (3) times. Applicants have up to 5 years to successfully complete the Equivalency process; extensions may be possible at the discretion of the NDEB.

The ACS is a two-day evaluation of technical dental procedures conducted on simulated patients (mannequins) in a clinical setting. The exam fee is \$5,500.00 and the exam is offered in June of each year.

The ACJ is a full day written assessment that tests for diagnostic, interpretive and clinical decision making ability of applicants. The exam fee is \$1,800.00 and the exam is offered the day following the ACS in June.

Successful completion of the 3 Assessments allows individuals to apply to take the NDEB National and OSCE Examinations.

The NDEB supplies preparation material for all three of the Equivalency Process exams in the form of Exam Protocols. Applicants are responsible to supply their own dental tools for the ACS.

### ***Dental Program Completion Programs***

Another option to qualify for the National Exam & OSCE is to apply for a two-year completion program offered at many accredited dental faculties including the University of Manitoba's Faculty of Dentistry. Students are provided professional orientation and complete the final two years of the conventional four-year dental program.

The NDEB AFK is a prerequisite to apply for admission to a dental degree completion program.

Costs vary by faculty, but are high and may be in excess of \$100,000.00 for some programs if you consider all associated costs. Application is competitive with a limited number of spots available; currently the University of Manitoba's Faculty of Dentistry offers 7 spots annually for its International Dentist Degree Program (IDDP).

## **2) MDA Application and Registration**

Upon NDEB certification, individuals apply to the MDA. Current cardiopulmonary resuscitation certification is required as well as a regulatory overview session held at the MDA. Applicants who have not completed an approved course in Canadian jurisprudence - which would include Equivalency Process applicants - must also complete an approved ethics and jurisprudence in dentistry course. These are offered by various dental regulators across the country or at several Canadian dental faculties including at the University of Manitoba.

Application to the MDA involves completing an application form, paying a \$200.00 registration fee and supplying the following documents.

- An original letter from the Dean or designate of training program and a certified photocopy of degree certifying your graduation from a dental training program;
- A certified copy of NDEB certificate;
- If licensed in another jurisdiction, an original Letter of Good Standing or Certificate of Standing from previous licensing bodies;
- Two original Letters of Reference from non-family members;
- Proof of professional liability insurance (costs \$1,700.00);
- A copy of Cardiopulmonary Resuscitation Program certificate
- Payment of \$3,150.00 annual licensure fee (prorated after September to \$2,150.00).

Upon completed application, the MDA notifies applicants usually within a day or two of its registration decision.

## **Appeal Process**

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In accordance with *The Dental Association Act*, MDA registration decisions are subject to appeal. Appeals are heard by the MDA Board of Directors independent of original decision makers. No fees are involved with an appeal. Applicants are advised of their right of appeal in writing with any registration decision that places restrictions, conditions or denies their application or ability to practice dentistry within the parameters of their licensure category.

## Time and Cost

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Time and costs for IEDs to complete the registration process vary according to the circumstance of the individual.

International graduates of accredited programs (United States, New Zealand, Ireland and Australia) face a fairly straightforward process identical to graduates of domestic accredited programs that will take 6 to 12 months and cost approximately \$5,000.00 for application, exams and registration. Significant delays and costs will be incurred if exam rewrites or re-takes are required and there likely will be associated costs preparing for exams, and acquiring malpractice insurance.

International graduates of non-accredited programs face a more costly and lengthy process. In addition to the above, individuals must first either complete the fixed date Equivalency Process assessments **or** complete the Equivalency Process Assessment of Fundamental Knowledge Exam and a two-year completion program at an accredited Canadian dentistry faculty. Those that pursue the Equivalency Process will at a minimum require 16 months but many take 2 to 3 years to complete entire assessment and registration process that will cost an additional \$8,800.00 or \$13,800.00 in total direct costs. Those that are successful enrolling in a completion program will need an additional 2 years for the program and will usually require 3 to 4 years in total. Costs for completion programs vary by faculty, but are high, potentially exceeding \$100,000.00.

In the Equivalency Process, assessment rewrites/retakes have additional costs. As the assessments are performed once per year, this will significantly increase the time necessary before licensure.

As overall success in the first attempt of the Equivalency Process is low – 20% are successful on all 3 exams first time round -- re-writes/retakes are common. Those graduating completion programs rarely require rewrites for the National Exam & OSCE.

There are significant associated costs for applicants in the Equivalency Process. Like most individuals in accredited dental training or IDD programs, individuals are responsible to provide their own dental equipment. In the Equivalency Process, the equipment and supplies for the ACS and preparation courses for the assessments are expensive and will be essential for many to be successful. For most individuals, the purchase of brand new equipment and supplies is difficult. Options to rent, borrow, share or purchase used equipment and supplies are possible. Time and cost will be required for Equivalency Process applicants completing an approved ethics and jurisprudence course.

For those in the Equivalency Process, these factors suggest a \$13,800.00 total cost and 2 to 3 years time window which are unrealistic for many applicants. Many individuals will experience a longer process and more expensive process.

A list of direct fees can be seen below:

- NDEB Application Fee
  - \$500.00 National Exam & OSCE
  - \$800.00 Equivalency Process
  
- National Written Exam \$800.00
  
- National OSCE \$900.00
  
- Assessment of Fundamental Knowledge \$700.00
  
- Assessment of Clinical Skills \$5,500.00
  
- Assessment of Clinical Judgement \$1,800.00
  
- First year IDDP Fee \$47,314.71
  
- Second year IDDP Fee \$43,013.37
  
- MDA Registration Fee \$200.00
  
- MDA Licensure Fee \$3,150.00
  
- Malpractice Insurance Fee \$1700.00

# Registration Review Findings

## Summary of Findings

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The Manitoba Dental Association (MDA) is committed to the fair assessment and recognition of internationally educated dentists (IEDs).

A dedicated assessment strategy is in place for the assessment and registration of IEDs. The profession underwent a major transition in 2011 with the introduction of the National Dental Examining Board of Canada's (NDEB) Equivalency Process. The Equivalency Process is comprised of three assessments that allow dentists from unaccredited academic programs to be assessed against Canadian training standards. Prior to 2011, only graduates of accredited dental programs would be eligible to write the national exam and be registered. Graduates of unaccredited programs needed to apply to a completion program at an accredited faculty of dentistry to take the final 2 years of the 4-year dental program. Completion programs are expensive and highly competitive to secure a seat.

The MDA has a history of active involvement in working to ensure fair registration practices. Assessment and registration policies are well documented. A dedicated IED information package is under development and will provide a much improved, applicant-friendly information resource. In 2011, the MDA reviewed and provided recommendations on the NDEB Assessment of Clinical Skills. The MDA has completed similar reviews with recommendations of the NDSE administered by the Royal College of Dentists of Canada to promote fair practice in the assessment of dental specialist.

A major finding of this OMFC registration review concerns the need to further evolve the Equivalency Process/Completion Program pathways to more efficiently recognize IEDs. The Equivalency Process is very demanding with few IEDs qualified or adequately prepared to successfully complete it. Completion programs offer extensive retraining to some of the more qualified, least-in-need IEDs and are expensive. Applicants are selected based on the performance on the Assessment of Fundamental Knowledge Exam and other qualifications. More pathways or more flexibility around the current pathways to provide the right measure of individualized gap training and professional orientation is called for.

The OMFC has identified concerns regarding the need for more detailed reasons and feedback for many of the NDEB exams as well as the need to broaden overly restrictive appeal policies for national assessments and exams. Finally, a few areas of the MDA registration information are flagged for improvement.

Key findings from MDA registration review are listed below. These findings cover the range of fairness issues as defined by the Fairness Standard and Criteria document and roughly follow the order of this document (see pp. 15-30).

- MDA current website provides limited information about the assessment and registration process for IEDs. A dedicated information package is under development and expected shortly. It will provide

helpful, step-by-step instruction and information on a variety of resources for IEDs.

- The NDEB website is well-organized, easy-to-navigate and provides clear information on qualification requirements and the assessment process. A dedicated self-assessment tool for IEDs allows for an indication of qualification and readiness against Canadian Standards. A list of 47 competencies definitive of Canadian practice is also provided.
- Mutual Recognition Agreements are in place between the Commission on Dental Accreditation of Canada and its counterpart organizations in the United States, the United Kingdom, Ireland, New Zealand and Australia that support the recognition of substantively equivalent academic training and provides graduates of these programs the same path to the National Written Exam & OSCE as graduates of domestic accredited programs.
- Application to the first-step NDEB is straightforward, requiring minimal documentation. The NDEB online application system allows applicants to track the status of their applications and receive timely assessment results.
- MDA staff provide strong personal support and assistance to applicants and communication is pro-active throughout the application process.
- MDA application decision timelines are prompt; usually within a day or two.
- The MDA documentation requirements, although for the most part clear, are not ideally presented as it is confusing precisely what documentation is required for which type of registration.
- Both the MDA and NDEB have alternative documentation policies in place. Alternative documentation information will be provided in the MDA new information package. Information about NDEB alternative documentation policies are only found in NDEB By-laws.
- The MDA does not require applicants to submit criminal record search documentation. Applicants are required to self-declare any criminal records. When records are disclosed, the MDA deals with concerns on a case-by-case basis.
- French or English language proficiency is not a formal registration requirement. The MDA has a dedicated page on in its new information package that provides information about the importance of English proficiency to be successful both with the assessments and in the field. The MDA recommends CLB 7 or higher in all four language areas. Helpful information is provided about notarization and translation services at the Immigrant Centre as well as language upgrading opportunities.
- Application, assessment and registration fees and timelines are for the most part clear. However, very limited realistic information is provided about the full costs (associated costs are significant) and true time

commitment likely involved. Given the high cost and potential for significant delays in the process, realistic information becomes critical for proper planning.

- The MDA and NDEB websites provide helpful resource links to support assessment preparation, language upgrading, translation services and alternative careers.
- A variety of standard documents are at hand and subject to regular review. These include the MDA Code of Ethics, the MDA numerous practice guideline documents and Bylaws as well as the NDEB Competencies for Beginning Dental Practitioners in Canada. These standards documents lay the foundation for rational regulation.
- NDEB assessments and exams – the National Written Exam & OSCE and the three assessments involved in the Equivalency Process – have been subjected to considerable psychometric scrutiny and continued review. Policies and procedures are in place to ensure proper invigilation and the training of assessors.
- Multiple methods of assessment are employed; individuals have the opportunity to demonstrate what they know and can do.
- The NDEB provides extensive information about the content, format and grading process for its assessments and exams. Pass rates for the 3 Equivalency Process assessments are available on the NDEB website.
- Pass rates for NDEB Equivalency Process are low, specifically the ACS; on the order of 20% of IEDs successfully complete all three exams on their first attempt. It is not clear to what extent this is a matter of qualification or preparation.
- Especially for the Assessment of Clinical Skills, proper preparation and knowledge of Canadian practice is critical to be successful. Applicants must supply their own dental equipment and supplies and may borrow or rent tools as new ones are costly. Several Canadian Dental programs offer preparation courses, including a new course at the University of Manitoba (\$4,200.00 fee). The OMFC understands many practicing Canadian dentists would struggle to pass this exam without preparation.
- Failing an NDEB Equivalency Process assessment is expensive and time consuming. Equivalency assessments are only offered once a year and the most challenging, the Assessment of Clinical Skills, costs \$5,500.00. No partial credit or multiple sittings opportunities are available to mitigate these difficulties.
- Feedback for most of the NDEB assessments – the Assessment of Fundamental Knowledge, the Assessment of Clinical Judgement, the National Written and OSCE Exam – is limited to single, test equated mark. For these assessments, this means individuals are given little



indication about which areas of the assessment they failed to meet standard and so little direction for future exam preparation.

- Reasonable feedback is provided for the NDEB Assessment of Clinical Skills: participants receive a score for each requirement of the assessment and an overall mark.
- NDEB assessment decisions are subject to appeal. However, review opportunities for the National Written and OSCE Exam, Assessment of Fundamental Knowledge, the Assessment of Clinical Judgment, and the Dental Specialty Core Knowledge Examination (for Specialist registration) are restricted to manual re-scores. The Assessment of Clinical Judgment is not subject to this restriction.
- Informal processes are in place to deal with invigilation issues. Applicants are informed of this verbally as part of the exam orientations provided for NDEB exams.
- For its exams, the NDEB has provision for "Compassionate Appeal" in circumstances of personal distress; individuals can have their exam results struck and receive 50% refund of fees.
- The Royal College of Dentists of Canada (RCDC), the national body responsible for the NDSE, offers an appeal process that is restricted to matters of procedure; the content of its exams is not subject to appeal.
- The MDA has a formal appeal policy in place. Applicants have thirty days upon written notification of registration decision to file appeal. Measures are in place to ensure independence of appeal members and that no conflicts of interests are apparent. Legal counsel is sought to support fair process.
- Appeal information accompanies any MDA registration decision that denies or places additional conditions on the applicant from those identified in that category of registration. Appeal information will be introduced to the new information package under development
- MDA appeal timelines concerning when an appeal will be reviewed or how long it will take for a decision to be rendered have recently been determined and will be introduced to the MDA appeal information.
- The MDA has a formal access to records policy in place; information about access to records will be introduced to the new information package under development.
- Registration and assessment fees are high, but not unreasonably so given the character of assessments involved. Both the MDA and the NDEB are non-profit organization and fees are based on cost recovery. Reliance on volunteers within the professions helps keep costs down.
- Many aspects of the assessment and registration process are structured efficiently and minimize unnecessary delays. However, for IEDs from unaccredited programs -- the majority of MDA IED applicants -- the system does not provide the variety of pathways needed to be efficient. Many of

the most qualified choose the re-training of a completion program and many of the lesser qualified are left to contend with a very difficult series of assessments for which they are largely ill-prepared.

### Commendable Practices

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A number of MDA's assessment and registration practices deserve to be recognized as exemplary, fair practices. Most of these will have already been described above or in other areas of this report, but the most significant bear repeating.

- The MDA new information package is a major improvement and will be a helpful resource for IEDs.
- The MDA well documented policies support transparency and consistent practice.
- The MDA together with the NDEB have instituted streamlined and reasonable documentation requirements – a best practice model that removes what can easily become unnecessary, unintended barriers for IEDs.
- The MDA strong commitment to fair practice is evident in their engagement and working relationship with the national bodies responsible for their assessments.

## Fairness Standard & Criteria Document – MDA Review Findings

<b>Standard: <i>Dedicated and fair practices are in place for the assessment and registration of internationally educated applicants. Policies and procedures are documented, consistently followed and periodically reviewed to ensure effectiveness.</i></b>					
Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	1. Qualification requirements and the criteria used to assess qualifications.	✓			
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	2. Documentation requirements.		✓		<p>MDA documentation requirements are for the most part clear.</p> <p>A new, dedicated information package for IEDs is under development and will be available shortly. The information package represents a significant improvement and is well-organized and easy to navigate.</p> <p>However, the page on documentation requirements is somewhat confusing as it is not fully clear which documentation is required of which type of application. It would be helpful if this were separated by registration type -- academic affiliate, student, specialist, etc.</p> <p>The OMFC understands that MDA staff provide strong personal support and assistance for its applicants throughout the registration process. This support partially mitigates the information concerns raised in this review.</p>
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	3. Fees and fee payment options.	✓			

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

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	4. A realistic sense and range of the full costs involved in the process, including common associated costs.		✓		<p>Assessment and registration costs in the dental profession rank among the most expensive. Consequently, a realistic sense of potential costs is critical for proper planning.</p> <p>For applicants with academic training from an accredited program face direct costs to the MDA &amp; NDEB totaling a minimum of \$5,500.00. Dentists from unaccredited programs must undergo the NDEB's Equivalency Process which adds another \$8,800.00 and must pay for an Ethics and Jurisprudence Course at an accredited Canadian university. Dentists that enroll in a completion program at a Canadian university can face tuition fees that exceed \$100,000.00.</p> <p>Associated costs are significant as well; dental tools are required; document translation and language upgrading may be needed; preparation courses and travel may be involved for NDEB assessments.</p> <p>Full and associated costs for the assessment and registration process for dental assistants and dental specialists are also significant.</p> <p>The MDA's new dedicated information package for IEDs provides some cost information but is incomplete, needs updating (Equivalency Process is priced at \$6,300.00) and little information is provided about associated costs. Individuals are directed to third parties for some of the costs.</p> <p>Complete cost information is needed as well as a realistic description of the nature of associated costs that may be involved.</p>
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	5. Financial support opportunities.	✓			

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

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	6. Timelines and key dates.		✓		<p>Timeline and key date information is for the most part clear.</p> <p>NDEB provides clear information about its fixed date exams, application windows and assessment result timelines.</p> <p>MDA application result timeline is not specified. The MDA's application assessments are very prompt – usually a day upon completed application. This should be made clear in the MDA's registration material.</p>
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	7. A realistic sense and time range of how long the entire process often takes.		✓		<p>Under the MDA's FAQ section, IEDs are advised the process may take two years or longer.</p> <p>The MDA reports that minimum assessment and registration timelines for dentists range from one to three years -- those from accredited programs typically 6 months to 1 year; those that undergo the Equivalency Process: 1 1/2 to 2 1/2 years; those that complete a completion program at a Canadian university: approximately 3 years. Dental specialists are reported to require a minimum of two years.</p> <p>Annual, fixed date NDEB equivalency exams mean that timelines are impacted by the time of year applicants apply and any equivalency exam re-writes will add another year to the process. Low pass rates on the Equivalency Process exams mean that this will not be uncommon. The NDEB is considering the feasibility of multiple offerings for the Assessment of Fundamental Knowledge Exam.</p> <p>A more elaborate account of the timeframes involved that describes the different types of timeframes commonly encountered would be beneficial and support proper planning.</p>
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	8. Step-by-step, easy-to-navigate path of the registration process.	✓			

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

Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
1. Applicants are provided clear, complete and accurate information about assessment and registration process.	9. Information provided about opportunities for general and occupation-specific upgrading.	✓			
2. Standards of practice are identified and periodically reviewed.		✓			
3. Required qualifications are relevant and necessary for competent professional practice.		✓			
4. Documentation requirements are reasonable. Alternative documentation opportunities are available and explained to applicants	1. Difficult-to-provide documents – e.g. originals, syllabus – are warranted.	✓			
4. Documentation requirements are reasonable. Alternative documentation opportunities are available and explained to applicants	2. Alternative documentation opportunities are available and clearly explained.		✓		Both the MDA and the NDEB have alternative documentation policies in place. The MDA intends to introduce alternative documentation information in its new information package for IEDs. Currently NDEB's information about alternative documentation is only found in their By-laws.  To ensure applicants are aware of the possibility of alternative documentation, information needs to be provided in the NDEB's documentation and application material.

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
4. Documentation requirements are reasonable. Alternative documentation opportunities are available and explained to applicants	3. Criminal records policy is warranted and clearly explained.	✓			
5. Any third party assessments in the registration process are transparent, objective, impartial and fair.	1. Applicants are provided clear, complete and accurate information about the role of third party assessments in the registration process.	✓			
5. Any third party assessments in the registration process are transparent, objective, impartial and fair.	2. Measures are in place to ensure third party assessment policy and practice is fair.	✓			

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
5. Any third party assessments in the registration process are transparent, objective, impartial and fair.	3. Third party assessment decisions are subject to appeal.		✓		<p>NDEB assessment decisions are subject to appeal. However, review opportunities for the National Written and OSCE Exam, Assessment of Fundamental Knowledge, the Assessment of Clinical Judgment, and the Dental Specialty Core Knowledge Examination (for Specialist registration) are restricted to manual re-scores.</p> <p>The OMFC understands that despite the appeal restrictions stipulated in the NDEB's registration material, a review process is in place to deal with invigilation issues and that applicants are informed of this verbally as part of the exam orientations provided for NDEB exams.</p> <p>The NDEB's Assessment of Clinical Skills is not subject to this restriction: "Within three months of the release of results of the Assessment of Clinical Skills, an individual may make submissions, in writing, to the NDEB setting out grounds for requesting to have a result of the Assessment of Clinical Skills changed and pay the required fee."</p> <p>We note the NDEB has provision for "Compassionate Appeal" in circumstances of personal distress; individuals can have their exam results struck and receive 50% refund of fees.</p> <p>The Royal College of Dentists of Canada (RCDC), the national body responsible for specialist exams, offers a \$500.00 appeal process that is restricted to matters of procedure; the content of its exams is not subject to appeal.</p> <p>Although mitigated to some extent by the extensive psychometric work invested in the development and execution of these exams, restricting appeal opportunities to rescoring or more broadly to matters of procedure, risks denying appeals of merit from being heard.</p>
6. Assessment of qualifications is transparent, objective, impartial and fair.	1. Valid and reliable methods of assessment are employed for internationally educated applicants.	✓			



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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
6. Assessment of qualifications is transparent, objective, impartial and fair.	2. Assessment methods and tools are subject to psychometric scrutiny and cultural review.	✓			
6. Assessment of qualifications is transparent, objective, impartial and fair.	3. Multiple assessment methods are available. Applicants have the opportunity to demonstrate competence.	✓			
6. Assessment of qualifications is transparent, objective, impartial and fair.	4. Knowledge and skills acquired through work experience are assessed, including international work experience.	✓			Work experience is not assessed. However, the competency assessments involved in NDEB's Equivalency Process and National OSCE allow individuals the opportunity to demonstrate what they can do and so represent a latent assessment of knowledge and skills acquired through work experience.
6. Assessment of qualifications is transparent, objective, impartial and fair.	5. International educational credentials are subject to a reasonable, valid equivalency assessment: reasonable measure has been taken to acquire an informed understanding of the content of international educational programs and their equivalence to Canadian programs.	✓			

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
6. Assessment of qualifications is transparent, objective, impartial and fair.	6. The regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience.	✓			Work experience is not assessed. However, competency assessments are in place.
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	1. Training for the assessment academic qualifications.	✓			
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	2. Training for the assessment of work experience.	✓			Work experience is not assessed. However, competency assessments are in place.
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	3. Appeal training.	✓			

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
7. Staffs responsible for assessment, appeals and working with internationally educated applicants received appropriate training and possess relevant expertise	4. Cross-cultural training.	✓			
8. English and French language proficiency requirements for registration and professional practice are reasonable.	1. French or English language proficiency levels are identified and based on the language demands of the profession.	✓			
8. English and French language proficiency requirements for registration and professional practice are reasonable.	2. Level of language proficiency identified at key points in the registration process – e.g., entry to practice vs. application or entry to gap training.	✓			
8. English and French language proficiency requirements for registration and professional practice are reasonable.	3. The identification of the nature and type of communicative demands for professional practice and the assessment process.	✓			
8. English and French language proficiency requirements for registration and professional practice are reasonable.	4. The appropriate use of language proficiency tests, expiration dating and test-scores.	✓			English or French language proficiency is not a formal registration requirement. Consequently no language tests are required for second language applicants.

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
8. English and French language proficiency requirements for registration and professional practice are reasonable.	5. A variety of English language test are recognized.	✓			English or French language proficiency is not a formal registration requirement. Consequently no language tests are required for second language applicants.
9. Assessment and registration process is relationally fair.	1. Written reasons accompany assessment results.	✓			
9. Assessment and registration process is relationally fair.	2. Detailed feedback is provided about qualification gaps.		✓		<p>Feedback for most of the NDEB assessments – the Assessment of Fundamental Knowledge, the Assessment of Clinical Judgement, the National Written and OSCE Exam – is limited to single, test equated mark.</p> <p>The NDEB reports that these assessments have not been psychometrically designed in a manner that supports the provision of more detailed results.</p> <p>For these assessments, this means individuals are given no indication about which areas of the assessment they failed to meet standard or where they were successful. Given the difficulty, high cost and high stakes character of these assessments, as well as the reality of re-writes for many IED applicants, more detailed feedback is called for. People have a right to know and this information can be critical to support future exam preparation.</p> <p>We note reasonable feedback is provided for the NDEB's Assessment of Clinical Skills: participants receive a score for each requirement of the assessment and an overall mark.</p>
9. Assessment and registration process is relationally fair.	3. Applicants have the opportunity to discuss assessment and registration decisions of concern.	✓			

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
9. Assessment and registration process is relationally fair.	4. Applicants without appropriate qualifications receive advice and information about alternative careers.	✓			
10. Registration process allows for different levels of recognition.	1. Opportunity for restricted or conditional license and supervised practice.	✓			
10. Registration process allows for different levels of recognition.	2. Re-assessment only required in areas where competence has not been demonstrated.		✓		<p>Partial credit is not possible for the NDEB exams or assessments. Given the difficulty, length and cost of some of the assessments involved, partial credit, where applicants would be required only to repeat areas where they failed to meet standard, would support more efficient assessment.</p> <p>The NDEB is giving consideration to more offerings for the Assessment of Fundamental Knowledge Exam. Currently candidates must wait a full year to re-write any equivalency exam or assessment. In conjunction with partial credit, this could greatly improve the timeliness of the process as well as the success rates for many IEDs.</p>
10. Registration process allows for different levels of recognition.	3. Time-frames for re-assessment are consistent with currency of practice standards.	✓			
11. A fair appeal or review process is available.	1. All assessment and registration decisions that deny or condition registration are subject to appeal.	✓			

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
11. A fair appeal or review process is available.	2. Appeal or review committee members are independent from those responsible for the original decision.	✓			
11. A fair appeal or review process is available.	3. Timely hearings and appeal decisions.	✓			
11. A fair appeal or review process is available.	4. Detailed, written reasons are provided to appellants for unfavorable decisions.	✓			
11. A fair appeal or review process is available.	5. Applicants are advised of their right to appeal.		✓		<p>Appeal information currently accompanies all of the MDA's registration decisions that deny or condition registration. The MDA will be introducing appeal information as part of its new information package for IED registration.</p> <p>Following the MDA's legislation, appeal information stipulates a notification timeline and the MDA Council responsible to hear appeals. However, the information fails to stipulate the timelines involved for the review to occur or for how long the MDA will take to provide a decision.</p> <p>We note Manitoba's <i>Regulated Health Professions Act</i> stipulates that with regard to registration decisions appeal hearings must be held within 90 days upon notice of appeal after which appeal bodies have 90 days to render an appeal decision.</p>

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
11. A fair appeal or review process is available.	6. Appeal information accompanies any assessment and registration decision subject to appeal.	✓			
12. Legal exceptions notwithstanding, applicants have full and timely access to their assessment results and records associated with registration.	1. There is a process under which requests for records are considered. Fees for access to records are reasonable and do not exceed cost recovery.	✓			
12. Legal exceptions notwithstanding, applicants have full and timely access to their assessment results and records associated with registration.	2. Applicants are informed of their access to records and the process for requesting records.	✓			
13. Fees involved in the assessment and registration process are reasonable.	1. Fees do not exceed cost recovery.	✓			<p>We note a concern with the tuition costs of the University of Manitoba Faculty of Dentistry's IDDP Program. The 2-year IDDP Program consist of the 3<sup>rd</sup> and 4<sup>th</sup> year of the conventional 4-year dental program, as well as 8-week orientation course.</p> <p>Save for the orientation course, these are identical programs. Yet tuition fees for the IDDP are markedly higher than the tuition fees paid for the 3<sup>rd</sup> and 4<sup>th</sup> year of the dental program: <b>\$37,972.34</b> tuition total for 3<sup>rd</sup> &amp; 4<sup>th</sup> year dental program compared to <b>\$90,328.08</b> tuition total for IDDP.</p> <p>The Fairness Commissioner will be raising this concern with the Faculty of Dentistry.</p>

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
14. Assessment and registration process is timely.	1. Reasonable measure is taken to ensure the prompt processing of applications and assessments.	✓			
14. Assessment and registration process is timely.	2. Communication with applicants is timely and systematic.	✓			



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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
14. Assessment and registration process is timely.	3. Assessment and registration process is structured efficiently and minimizes unnecessary delays.		v		<p>Many aspects of the assessment and registration process are structured efficiently and minimize unnecessary delays: documentation requirements are streamlined and reasonable; the NDEB provides a no-fee self-assessment tool; its online application system supports timely application and systematic communication; the MDA's new information package includes information about a variety of resources to support IEDs navigating the process; NDEB exams are timed to follow one another; NDEB's National Exam and OSCE is offered twice a year with provisions in place to allow for international and additional sittings; accredited programs in the United States, Australia, New Zealand and Ireland are recognized as substantively equivalent to accredited Canadian Programs.</p> <p>Still for IEDs from unaccredited academic programs, the assessment and registration process as a whole is far from ideal and would benefit from reform.</p> <p>For IEDs from unaccredited academic programs, there are three pathways to registration:</p> <ol style="list-style-type: none"> <li>1. Complete the NDEB's Equivalency Process and then complete the National Written and OSCE Exam;</li> <li>2. Complete the first step Equivalency Process Assessment of Fundamental Knowledge exam and then complete a two-year completion program at a Canadian dental program and then write the National Written and OSCE Examination.</li> <li>3. Start all over again; complete an accredited dental program.</li> </ol> <p>The first option involves completing a very demanding Equivalency Process that is appropriate for well prepared IEDs with Canadian-like training. Those with gaps in training relative to Canadian standards or who are mid-career and not well prepared to pass the competency assessments will not likely be successful. Low pass rates for the Equivalency Process, on the order of 20%, suggest the majority of IEDs are not appropriately qualified or prepared to pass the Equivalency Process.</p> <p>The second option -- a two-year completion program -- involves IEDs re-completing a dentistry degree, in this case the last 2 years of a 4-year program. Individuals who undertake this pathway tend to be highly successful. Entry to these programs is competitive as faculties have limited spots. They are also very expensive. Dentists with the greatest chance of succeeding in the program are</p>

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Elements	Criteria	Assessment			Office of the Manitoba Fairness Commissioner's Findings
		Compliant	Needs Improvement	Non-compliant	
14. Assessment and registration process is timely.	3. Assessment and registration process is structured efficiently and minimizes unnecessary delays.		V		<p><i>(continued)</i></p> <p>selected and receive valuable orientation and Canadian-specific training.</p> <p>As a largely unmodified, final two- year dental program, candidates are also subject to considerable redundancy in their training, as they already have completed dental degrees.</p> <p>Functioning as a whole, these two pathways result in a situation where the some of the most highly qualified receive the most training and the least, the least. Some highly qualified applicants are successful at the Equivalency Process, but receive very little in the way of professional orientation. None of these groups benefits from a maximally efficient process as one faces an expensive two-year delay with a full time commitment to go back to school irrespective of their need for retraining, one passes a rigorous screening process but may be in need of professional orientation and the last, the precarious prospect of several years challenging, failing and retaking difficult, once-a-year exams for which they struggle to be prepared.</p> <p>More pathways, more flexible and responsive to the range of qualifications and skills IED possess are needed. The current all-or-nothing approach – be retrained or be subject to rigorous screening assessments -- fails to be efficient in a situation that requires a broader range or continuum of orientation and individualized gap training opportunities. Completion programs should only be for those in need of that degree of retraining. Some measure of professional orientation should be mandatory for all IEDs. 20% success rates on an examination process that fruitlessly entangles people for several years needs to be avoided.</p>

## Fairness Commissioner's Recommendations

As a result of the OMFC's registration review of the Manitoba Dental Association (MDA) and to ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends:

1. With regard to the assessment and registration information, *that* MDA provide clear, complete and accurate information about:
  - a. Documentation requirements for each type of registration;
  - b. Realistic cost range information, including common associated costs and more elaborate time range and timeline information, including the MDA's application timeline;
  - c. MDA appeal timelines to hold a hearing and to provide an appeal decision.
2. *That* the MDA contact the NDEB and request that partial credit and additional exam opportunities be explored for the Assessment of Clinical Skills and the Assessment of Clinical Judgement exams;
3. *That* the MDA contact the NDEB and request that more detailed feedback be provided for the Assessment of Fundamental Knowledge Exam, the Assessment of Clinical Judgement Exam, and the National Written and OSCE Exam;
4. *That* the MDA contact the NDEB and request that alternative documentation information be introduced to its application information;
5. *That* the MDA contact the NDEB and RCDC and request the current restriction of appeals to re-scoring and matters of procedure be broadened to allow for any appeal of merit to be heard;
6. *That* the MDA work with its third party stakeholders to explore and evolve more gap and professional orientation pathways to registration for IEDs with non-accredited academic training.

## Manitoba Dental Association's Action Plan

In response to the Fairness Commissioner's Recommendations, the Manitoba Dental Association proposed the following action plan as of July 2013. The plan is reprinted in its entirety under the 'MDA's Planned Action(s)' column in the table below.

The MDA'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.

OMFC's Recommendation	MDA's Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>1. With regard to the assessment and registration information, <i>that</i> MDA provide clear, complete and accurate information about:</p> <p>a. Documentation requirements for each type of registration;</p> <p>b. Realistic cost range information, including common associated costs and more elaborate time range and timeline information, including the MDA's application timeline;</p> <p>c. MDA appeal timelines to hold a hearing and to provide an appeal decision.</p>	<p>1.a. Although there are different categories, the required documentation for each category is almost identical. In order to improve clarity, the MDA will specify document requirements by category on the website and revise its application form. The website revisions should be completed in the short term. A revision to the application form will need to be reviewed by Committee and approved by the Board but should be completed in the middle term.</p> <p>1.b. The MDA will review the website information to ensure the registration timeline is accurate. This should be completed in the short term.</p> <p>The timelines for assessments pass rates and consequences are outlined on the websites. The MDA is reluctant to make subjective statements on individual chances of success.</p> <p>The potential variation on some associated costs - courses, equipment - creates a range that may be of limited value. The MDA will review opportunities to improve access options for equipment. This will be an ongoing effort.</p> <p>1.c. The changes to the MDA website will include the timeline for the appeal process as described in the MDA Registration Manual. This will be completed in the short term.</p>	<p>✓</p> <p>✓</p> <p>Ongoing</p> <p>✓</p>	<p>✓</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Ongoing</p>	
Regulator's Comments:					

OMFC's Recommendation	MDA's Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
<p>2. That the MDA contact the NDEB and request that partial credit and additional exam opportunities be explored for the Assessment of Clinical Skills and the Assessment of Clinical Judgement exams;</p>	<p>2. The MDA will draft letters to the NDEB and other dental regulatory authorities to recommend a process to objectively review the options, requirements, costs, benefits and risks for assessments and examination which allow for partial credit.</p> <p>A request to review options to increase the opportunities to perform the ACS and ACJ. The letters will be drafted in the short term.</p>	<p>✓</p>			
<p>Regulator's Comments: The NDEB has provided a detailed explanation on its examination development processes and the use of conjunctive assessment to balance the proof of competency with cost and timeliness. Currently, the assessments are not designed to allow for partial credit in a particular area. If possible, significant changes to the assessments would be necessary in order to allow partial credit for any particular competency.</p> <p>There are physical limitations and time constraints on accessing facilities required for the ACS.</p>					
<p>3. That the MDA contact the NDEB and request that more detailed feedback be provided for the Assessment of Fundamental Knowledge Exam, the Assessment of Clinical Judgement Exam, and the National Written and OSCE Exam;</p>	<p>3. The MDA will draft a letter to the NDEB to discuss options to provide more objective accountable feedback of results for the AFK, ACJ, written and OSCE examinations. A review of the implications to the assessment and examinations format in order to allow this feedback will be requested.</p> <p>The letter should be completed in the short term.</p>	<p>✓</p>			
<p>Regulator's Comments:</p>					

OMFC's Recommendation	MDA's Planned Action(s)	Short Term Less than 3 months	Medium Term 3 months to 1 year	Long Term 1 year or more	Completion Date
4. That the MDA contact the NDEB and request that alternative documentation information be introduced to its application information;	4. The MDA will draft a letter to the NDEB to discuss improving access to applicants to information about alternative documentation options.  This letter should be completed in the short term.	✓			
Regulator's Comments:					
5. That the MDA contact the NDEB and RCDC and request the current restriction of appeals to re-scoring and matters of procedure be broadened to allow for any appeal of merit to be heard;	5. The MDA will draft a letter to the RCDC to request further review of its appeal procedures to ensure transparency, objectivity and fairness in the examination process.  The letter should be completed in the short term.	✓			
Regulator's Comments: The nature of most NDEB examinations (multiple choice) limit potential merit based appeals to issues of errors in computer re-scoring or procedures. The appeal process in the ACS does take into account the nature of this assessment and candidates have been successful in appeals where documentation has not been sufficient.					

<b>OMFC's Recommendation</b>	<b>MDA's Planned Action(s)</b>	<b>Short Term</b> Less than 3 months	<b>Medium Term</b> 3 months to 1 year	<b>Long Term</b> 1 year or more	<b>Completion Date</b>
<p>6. That the MDA work with its third party stakeholders to explore and evolve more gap and professional orientation pathways to registration for IEDs with non-accredited academic training.</p>	<p>6. The MDA will continue to work with government, third party assessors and other dental regulators to ensure accountable pathways that are consistent with our public safety mandate and available resources are accessible to all applicants.</p> <p>This will continue to be an ongoing effort.</p>	Ongoing	Ongoing	Ongoing	
<p>Regulator's Comments:</p>					



## Fairness Commissioner's Statement of Compliance

The Manitoba Dental Association's Action Plan is in many respects a progressive response to the recommendations resulting from the OMFC registration review. These actions will support the fairer assessment and recognition of internationally educated dentists (IEDs) with unaccredited academic training and are consistent with *The Fair Registration Practices in Regulated Professions Act*.

MDA management and staff take seriously their role and responsibility to ensure, with all due diligence, a fair and sound assessment process and have a history of engaging national, third party bodies involved in the process. This orientation has also been reflected in their engagement and cooperation with the OMFC and their genuine interest to comply with *The Fair Registration Practices in Regulated Professions Act*.

The difficulties realizing a fair and efficient assessment process for IEDs in this profession are significant and challenging. The high level of skills and training required of practitioners, together with high public safety concerns in the field, calls for rigorous and demanding applicant testing and assessment. With the current Equivalency Process and the University of Manitoba's IDDP Program as the only options, many of Manitoban IEDs have little opportunity to receive the right measure of training and support they require for licensure.

Limited resources and the complexities of a multi-stakeholder assessment process conspire to entrench the status quo. I believe solutions to better serve all Manitoban IEDs are real possibilities but will require leadership. The Association could play such a role and I will continue to pursue this matter with them and other relevant stakeholders to move things forward.

I appreciate the professionalism and comprehensive engagement of MDA's management and staff in our review work and look forward to future discussions.

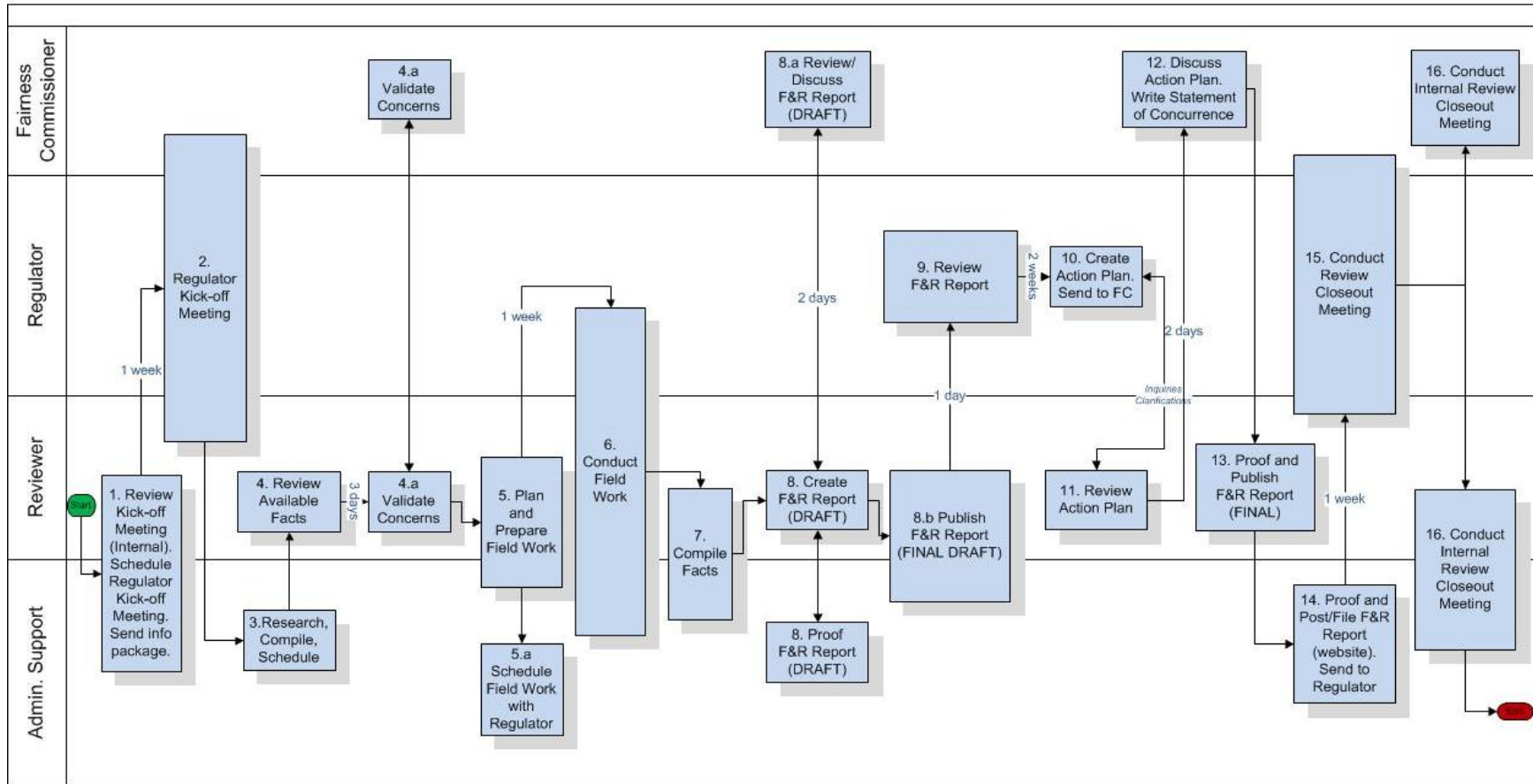


Ximena Munoz

Manitoba Fairness Commissioner

# Appendix A

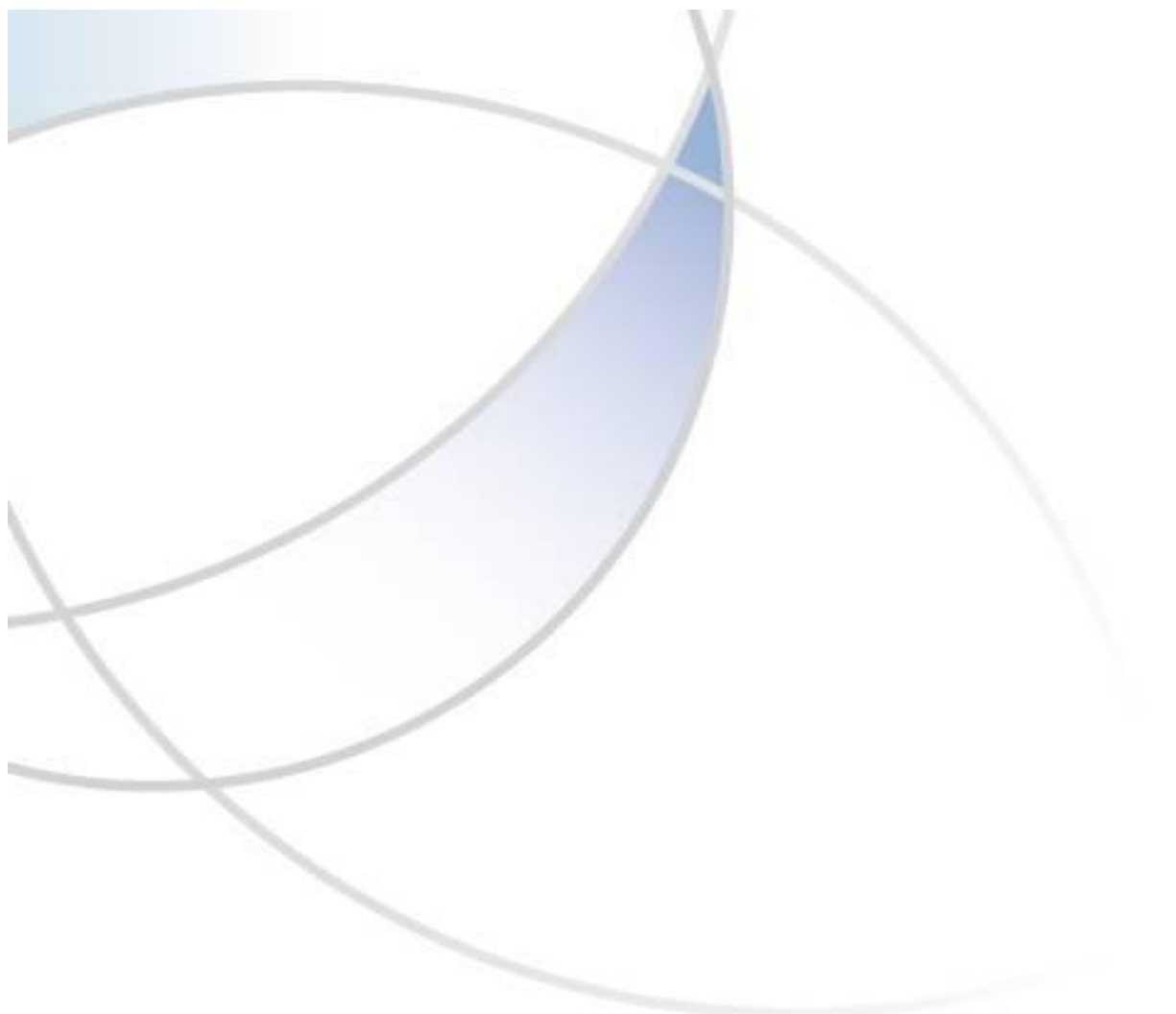
## OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER Registration Review Process



## Appendix B

<b>MDA's Registration Review</b>		
<b>Activity</b>	<b>Description</b>	<b>Date</b>
<b>Block Meeting</b>	<ul style="list-style-type: none"> <li>Meeting between OMFC, MDA and other regulators in the block of reviews for this period</li> <li>Registration review process presented</li> <li>Review schedule set</li> <li>Documentation requested</li> </ul>	<ul style="list-style-type: none"> <li>March 21, 2013</li> </ul>
<b>Kick-Off Meeting</b>	<ul style="list-style-type: none"> <li>Launch of MDA's registration review</li> <li>Key decisions makers from regulator in attendance</li> <li>Collect requested documentation</li> <li>Fieldwork planned</li> </ul>	<ul style="list-style-type: none"> <li>May 3, 2013</li> </ul>
<b>Fieldwork</b>	<ul style="list-style-type: none"> <li>Collect information otherwise unavailable through public information and policy documents</li> <li>Clarify information and acquire a more in-depth understanding of policy and practice</li> </ul>	<ul style="list-style-type: none"> <li>May 23, 2013</li> </ul>
<b>Findings and Recommendations Report</b>	<ul style="list-style-type: none"> <li>MDA receives a report with the review findings, the Fairness Commissioner's recommendations and a request for an Action Plan</li> <li>Findings and Recommendations Meeting</li> </ul>	<ul style="list-style-type: none"> <li>June 6, 2013</li> <li>June 7, 2013</li> </ul>
<b>Action Plan</b>	<ul style="list-style-type: none"> <li>MDA's Action Plan submitted to OMFC</li> </ul>	<ul style="list-style-type: none"> <li>June 21, 2013</li> </ul>
<b>Final Registration Review Report</b>	<ul style="list-style-type: none"> <li>Final report submitted to MDA; report contains the review findings, the Fairness Commissioner's recommendations, MDA's Action Plan, and the Fairness Commissioner's Compliance Statement</li> </ul>	<ul style="list-style-type: none"> <li>July 4, 2013</li> </ul>
<b>Registration Review Closeout Meeting</b>	<ul style="list-style-type: none"> <li>Discuss review results &amp; Action Plan</li> <li>Final report uploaded to OMFC's website</li> </ul>	<ul style="list-style-type: none"> <li>July 11, 2013</li> </ul>





OFFICE OF THE MANITOBA  
FAIRNESS COMMISSIONER

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