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Pathway to Licensure for International Medical Graduates via a Practice Ready Assessment: Specialists and SEAP Status Affiliates (with a primary specialty of Internal Medicine)

Section:	Registration		
Applicable Legislation:	Medical Practitioners Regulations Sections 14-15, 36-38, 39-45, and 59-63		
Approved by:	Approval Date:	Reviewer:	Review Date:
Registration Policy Committee	April 15, 2021	Deputy Registrar	April 2022
Executive Committee	April 26, 2021		

Preamble

A Defined licence is on the Conditional Register and requires a pathway to a Full licence. To qualify for a Defined licence in a specialty or subspecialty, a physician must have eligibility to challenge the certification examination with the Royal College of Physicians and Surgeons of Canada (RCPSC). For various reasons, some International Medical Graduates (IMGs) are not deemed eligible by the RCPSC and therefore at the outset, are not eligible for a Defined licence.

Purpose

Practice Ready Assessments for Specialists and Medical subspecialists require significant collaboration among several stakeholders, namely – the College, the Health Authorities, Department of Health and Wellness and the Faculty of Medicine at Dalhousie University. This policy outlines the roles and responsibilities for each. The letter sent jointly from the Health Authority, Dalhousie University and the Department of Health and Wellness endorses the candidate to the College represents a commitment to this process and the relevant roles and responsibilities.

The policy applies to international medical graduates (IMGs) whose training and certification are not immediately acceptable for eligibility to challenge the Royal College of Physicians and Surgeons of Canada (RCPSC) ²⁵ certification examination.

This policy outlines an alternate pathway to licensure for independent practice in Nova Scotia via a Practice Ready Assessment (PRA) for:

- Medical or Surgical Specialists whose specialty training is equivalent in years of training to Canadian training programs of the respective specialty²⁷.
- Medical subspecialists who have successfully completed a Subspecialist Examination Affiliate Program (SEAP) and have attained SEAP Affiliate Status with the RCPSC²⁸. Specifically, the subspecialist's primary specialty must be in Internal Medicine.

This is a collaborative process, involving engagement and communication with NSH, the College, and the RCPSC. It begins with the endorsement of a candidate for a PRA by the NSH. Success in a PRA leads to College endorsement of a candidate to the RCPSC. With this endorsement, the RCPSC will assess the candidate for eligibility to challenge the certification examination.

With exam eligibility, the candidate becomes eligible for a Defined licence in Nova Scotia. The Defined licence has a pathway to Full licensure via challenging the certification examination with the RCPSC and obtaining the LMCC or alternative.

Overview of Licensure for Independent Practice

Requirements for Licensure

The requirements for licensure to practise medicine in Nova Scotia are set by the *Medical Act*¹ and the Medical Practitioners Regulations².

Licence Types

There are three relevant licence types for independent practice as the Most Responsible Physician in Nova Scotia:

Licence Type	Description	
Full licence ⁷	The Full licence is an ongoing, renewable licence for practice without supervision or conditions or restrictions. A Full licence may be granted to physicians holding:	
	A Medical Degree from a school listed in the World Directory of Medical Schools ¹⁰ ;	
	2. The LMCC ²² or an acceptable alternative to the LMCC ¹⁶ ; and	
	3. Certification by the RCPSC ²⁵ or the CFPC ³⁰ or the CMQ ²⁹ .	
Restricted licence ⁷	The Restricted licence is an ongoing, renewable licence typically issued to:	
	Physicians who meet all or most of the criteria for a Full licence but have conditions and/or restrictions on their practice imposed by the College; or	

Licence Type	Description		
	 Relevant to this policy, a physician on a Defined licence who successfully undergoes a Comprehensive Clinical Assessment of Practice (CCAP)¹⁷ as determined by the Registration Committee will be issued a Restricted licence. 		
Defined licence ⁷	The Defined licence is a renewable, but time-limited licence, issued for a maximum of 60 months to physicians who have a medical degree, but who have not yet obtained the LMCC ²² and Canadian certification ²⁵ .		
	Defined licensees must practise under the sponsorship and supervision of another physician ¹⁵ as they pursue the qualifications for Full or Restricted licensure.		

Pathway from PRA to Independent Practice

Upon review by the Registration Committee, successful completion of a PRA leads to a Defined licence⁷ to practise medicine in Nova Scotia. All Defined licensees are required to pursue the Full licensure requirements, namely the LMCC²² and certification with the RCPSC²⁵.

Defined licensees who achieve certification and the LMCC (or alternative¹⁶), are issued a Full licence⁷.

Defined licensees who do not achieve RCPSC certification may be eligible to challenge a Comprehensive Clinical Assessment of Practice (CCAP)¹⁷. Success in the CCAP leads to a Restricted licence⁷ with conditions and restrictions that are, in part, informed by the results of the CCAP.

Practice Ready Assessments in Nova Scotia

A PRA is a practice-based assessment used to determine whether the physician is ready for independent practice in Nova Scotia.

The PRA is conducted over a minimum of 12 weeks, by a minimum of two assessors, under a Clinical Assessment licence⁷. This licence type is designed strictly for assessment purposes only and the physician holding this licence is never the most responsible physician.

Specialty PRAs are conducted by the relevant department in the Faculty of Medicine at Dalhousie University²¹.

All candidates for a PRA must have the endorsement of one of Nova Scotia's health authorities (Nova Scotia Health¹⁹ or the IWK Health Centre²⁰) and the Dalhousie University Faculty of Medicine²¹, and approval from the Department of Health and Wellness³¹. Candidates must also meet the eligibility criteria for licensure outlined in this policy.

The cost of the assessment itself including the College's administration fee is the responsibility of Nova Scotia Health and the Department of Health and Wellness. The licence fee⁸ for the assessment and for ongoing licensure in Nova Scotia is the responsibility of the candidate.

More details on the PRA are outlined under the College's Framework for the Conduct of Practice Ready Assessments – Specialists¹⁸.

Notes for Royal College Subspecialist Examination Affiliate Program (SEAP) Designates²⁸

For SEAP designates in particular, the purpose of the PRA is to determine whether the physician has the skills and knowledge to cover on-call shifts in the primary specialty of Internal Medicine. The PRA does not assess the skills of the SEAP designate in the respective subspecialty as the SEAP designation offers assurance of competence in the designated subspecialty.

A successful outcome in the PRA gives SEAP designates a Defined licence⁷ for practise in the SEAP subspecialty, as well as the scope of practice within Internal Medicine assessed by the PRA.

A successful outcome also gives the SEAP designate eligibility for the RCPSC certification exam²⁵ in Internal Medicine. For candidates who achieve success in the RCPSC Internal Medicine certification exam, the RCPSC will convert the SEAP designation to certification in the subspecialty.

Eligibility Criteria

A note about documentation:

Candidates must provide evidence that they meet the eligibility criteria listed in this document. Documents may be required at various stages of the application and referral process.

Upon initiation of the application process, you will be assigned a Registration Coordinator who will direct you regarding the *specific* documentation required for your application. You will also be advised *when* in the process the documentation is required. Required documentation could include, but is not limited to:

- Confirmation of credentials, source verified by physiciansapply.ca²³
- Certificates of Professional Conduct¹⁴
- Proof of eligibility to work in Canada
- Proof of offer of employment in Nova Scotia
- Letters of employment and letters of reference
- Curriculum vitae
- Criminal record check

In accordance with Section 39 of the Medical Practitioners Regulations², candidates for a Practice Ready Assessment must demonstrate the "capacity, competence and character to safely and ethically practise medicine" by meeting the eligibility criteria listed below.

1. Eligibility to Work

Candidates:

- Must be Canadian citizens *or* legally entitled to live and work in Canada.
- Must have an offer of employment upon independent licensure, in an area of defined need, from either Nova Scotia Health¹⁹ or the IWK Health Centre²⁰.

- Must not be prohibited or restricted from practising medicine through the decision of any adjudicating body or through voluntary agreement or otherwise (other than by conditions or restrictions imposed on a licence by a regulator).
- Must not have a criminal record.

2. Credentials

Candidates must have all of the following credentials:

Credential	Description	
Medical Degree	Medical degree from a school listed in the World Directory of Medical Schools ¹⁰ .	
Medical Council of Canada (MCC)	One of the following two options: 1. Pass standing in: - The MCC Qualifying Examination (MCCQE) Part 1 ²² AND - The MCC National Assessment Collaboration (NAC) OSCE OR the MCCQE Part II ²² . OR 2. Qualify for an Acceptable Alternative to the LMCC ¹⁶ .	
Specialty Recognition	Primary Specialists must have certification in a specialty that is equivalent to a Primary Specialty as defined by the RCPSC ⁵ . SEAP designates must have both: Royal College Subspecialist Affiliate status ²⁸ . Certification in a subspecialty that is equivalent to a subspecialty as defined by the RCPSC ²⁷ .	

3. English Language Proficiency

In accordance with Section 39 of the Medical Practitioners Regulations², candidates are required to demonstrate proficiency in the English language, in a manner prescribed by the Registrar.

All physicians must have the ability to effectively communicate with patients, other professionals and the College as described in the College policy on *English Language Proficiency*¹².

4. Postgraduate Training

All candidates (Primary Specialists and SEAP designates) must have successfully completed postgraduate training that is substantively equivalent in amount of time as compared to Canadian training²⁷ programs in the relevant primary specialty and/or subspecialty.

5. Practice Experience

All candidates must have the following independent practice experience:

- Minimum of three years of independent practice in the primary specialty or subspecialty.
- Currency of practice¹¹ in the primary specialty or subspecialty, defined as 6 months in the last 3 years. For subspecialists, the College may consider Canadian fellowship training for 6 months in the last 3 years in lieu of independent practice.

SEAP designates must also have an independent, unrestricted licence to practice in the current or most recent practice location or enrollment in a Fellowship training program in Canada within the last three years.

All candidates must provide an explanation for any gaps in practice.

6. Prior Practice Ready Assessments

Candidates must have fewer than two previous unsuccessful attempts in Canadian practice ready assessment programs, as collected by physiciansapply.ca²³.

7. Requirements for Entering Practice

At the time of licensure, candidates must have the following:

- A Medical Identification Number for Canada (to be issued at the time of licensure).
- Medical liability protection, malpractice insurance or other form of indemnity in the manner and amount required by the Registrar.
- Enrolment in the Continuing Professional Development (CPD) program with the Royal College of Physicians and Surgeons of Canada²⁵.

Note that there are other requirements for practising medicine in Nova Scotia that are outside the requirements of licensure. For more information, please refer to the College website page on What You Need to Know to Practise Medicine in Nova Scotia⁵.

Getting Started with a PRA

To be considered for a PRA, a candidate must be jointly recommended by the Health Authority (NSH¹⁹ or IWK²⁰) and the relevant Faculty of Medicine at Dalhousie University²¹. Together, the Health Authority and Dalhousie University's process includes, but is not limited to:

- Ensuring the potential candidate's medical degree is recognized in the World Directory of Medical Schools¹⁰
- 2. Determining the potential candidate is not from an approved jurisdiction with the RCPSC²⁶
- 3. Ensuring the potential candidate's training is at least the same length as Canadian training in respective specialty or subspecialty²⁷
- 4. Ensuring the potential candidate qualifies for all of the above listed eligibility criteria
- 5. Interviewing the chosen potential candidates to review credentials, scope of practice, and practice history. Review the proposed practice site to ensure the competencies and expectations align between the candidate and the expected practice environment.

Once the Health Authority and the relevant Faculty of Medicine at Dalhousie University choose the candidate, the Health Authority will provide a letter of endorsement to the College. Each letter of endorsement must include:

- 1. Confirmation there is a need for the relevant specialty or subspecialty in the province and a job offer will be forthcoming upon successful completion of the PRA leading to Defined licensure
- 2. Confirmation of approval from the Department of Health and Wellness.
- 3. Confirmation there is funding in place for the PRA (inclusive of remuneration for the Assessors and the candidate, the College's administrative fee and any other cost identified by the relevant Faculty of Medicine)
- 4. Confirmation that Department of Health and Wellness will issue a return of service agreement if the candidate is successful
- 5. An outline of the proposed Practice Ready Assessment lasting a minimum of 12 weeks in duration. The proposed PRA must conform to the National Assessment Collaboration (NAC) model²⁴. This may require adaptation for the relevant specialty and should include a set of tools and materials.
- 6. Confirmation the candidate appears to meet the eligibility criteria in this policy.

Once candidates have the endorsement of a health authority, they may apply for licensure through physiciansapply.ca²³. The College will review the candidate's application to ensure eligibility for a Defined licence⁷ upon successful completion of the PRA.

Before starting a licensing application through physiciansapply.ca for a PRA, candidates should review:

- The eligibility criteria in this document. Contact the College of Physicians and Surgeons of Nova Scotia for questions related to eligibility⁴.
- The 'How to Apply' section on the College webpage for 'Practice Ready Assessment for International Medical Graduates'⁶. This page outlines all of the steps in the application process for PRAs.

Practice Ready Assessment Process

Licensure for Practice Ready Assessment

Candidates selected for a PRA will be issued a Clinical Assessment licence⁷ for the purpose of the PRA. This licence type is designed strictly for assessment purposes only and the physician holding this licence is never the most responsible physician.

Practice Ready Assessment

The relevant Faculty of Medicine at Dalhousie University²¹ will perform the PRA. There will be at least 2 assessors and there will be a designated Lead Assessor. The assessment will be at least 12 weeks in duration.

Once the assessment has commenced, it will be considered a PRA attempt whether the candidate withdraws or completes the assessment. All PRA attempts are reported to the Medical Council of Canada and will be noted in future applications.

Within 30 days of completion of the PRA, the relevant Faculty of Medicine (may be delegated to the Lead Assessor) will provide all interim and final assessments of the candidate's performance to the College.

Practice Ready Assessment Recommendation

The Registration Committee of the College will review the assessment report and recommendations from the Faculty of Medicine at Dalhousie University to determine one of the following:

- 1. The physician has demonstrated the competencies necessary for Defined licensure⁷, with or without conditions and restrictions on the licence.
- 2. The physician has demonstrated the competencies necessary for a different form of licensure.
- 3. The physician has not demonstrated competencies for any form of licensure.

Outcomes of Practice Ready Assessment

- 1. For candidates who have demonstrated the competencies necessary for Defined licensure⁷:
 - The College will provide a letter of recommendation to the RCPSC to endorse the candidate's
 eligibility for the certification examination in the primary specialty for specialists and in Internal
 Medicine for medical subspecialists.
 - Following completion of the application for a Defined licence and payment of applicable fees, the College will issue the candidate a Defined licence with supervision, starting at Standard Level supervision¹⁵. Based on the Registration Committee's review of the PRA results, the licence may also include conditions and restrictions¹³.
 - For successful SEAP designates, the Defined licence will be restricted to the subspecialty practice of the SEAP designation and to Internal Medicine in the scope assessed in the PRA.

Please refer to the policies regarding Defined licensure^{13, 15} for more information.

- 2. For candidates who have demonstrated the competencies necessary for a different form of licensure, the candidate will be invited to apply for that licence type.
- 3. For candidates who have not demonstrated competencies for any form of licensure, the candidate will be denied licensure. This must be disclosed to other Medical Regulatory Authorities if asked about a history of being denied licensure.
- 4. Upon receipt of confirmation of exam eligibility from the RCPSC, the College will issue a Defined licence⁷.

Appeals

The candidate has the option to appeal the decision of the Registration Committee through the College's Registration Appeal Committee.

The candidate must notify the Registrar of their intent to appeal the decision of the Registration Committee within 30 days from the date of the Committee's initial decision.

Once the Registrar receives the candidate's request for an appeal, they will give the Registration Appeal Committee all the information required to conduct a thorough and fair review of the candidate's file, including but not limited to:

- all of the information provided to the Registration Committee;
- the decision of the Registration Committee; and
- any supporting documentation provided by the candidate.

The Registration Appeal Committee is comprised of three physicians and at least one representative of the public. All decisions of the Registration Appeal Committee are final.

Resources

Legislation

- 1. Medical Act
- 2. Medical Practitioners Regulations
- 3. Section 59-63 of Regulations for Restricted Licence

College Website

- 4. Home Page
- 5. What You Need to Know to Practice Medicine in Nova Scotia
- 6. Practice Ready Assessment for International Medical Graduates
- 7. <u>Licence Types</u>

College Policies

- 8. Fee Schedule
- 9. Registration & Licensing Policies and Guidelines
- 10. University or School Approved by Council + World Directory of Medical Schools
- 11. Currency of Practice Experience
- 12. English Language Proficiency
- 13. Requirements and Conditions for a Defined Licence
- 14. Certificates of Professional Conduct
- 15. Supervision Levels for College-Directed Supervision
- 16. Acceptable Alternatives to the LMCC
- 17. Comprehensive Clinical Assessment of Practice
- 18. College's Framework for the Conduct of Practice Ready Assessments Specialists

Nova Scotia Health Authorities

- 19. Nova Scotia Health
- 20. IWK Health Centre

Dalhousie University Faculty of Medicine

21. Home Page

Medical Council of Canada

- 22. MCC Examinations
- 23. physiciansapply.ca
- 24. National Assessment Collaboration Internal Medicine PRA Standards

Royal College of Physicians and Surgeons of Canada (RCPSC)

- 25. Home Page
- 26. Approved Jurisdictions
- 27. Specialty Training Requirements
- 28. Subspecialist Examination Affiliate Program (SEAP)

Collège des Médecins du Québec (CMQ)

29. Home Page

College of Family Physicians of Canada (CFPC)

30. <u>Home Page</u>

Nova Scotia Department of Health and Wellness

31. Home page