



World Education Services (WES) and Internationally Trained Physicians Access Coalition (ITPAC) Recommendations to the College of Physicians and Surgeons of Ontario (CPSO)

Proposed Regulation Change: Emergency Circumstances Practice Class of Registration

March 24, 2023

Context:

The CPSO has drafted [amendments](#) to Section 5 of [Ontario Regulation 508/22](#) (Registration Requirements) under the Regulated Health Professions Act (RHPA), which sets out a new Emergency Circumstances Practice class of registration. These amendments would allow some applicants to obtain Emergency Circumstances Practice registration, enabling qualified applicants to practice medicine under the supervision of an independently licensed physician for a period of up to one year, with renewals possible.

The amendments also have implications for pathways to Independent Practice licensing under the CPSO, in that an individual who holds an Emergency Circumstances practice licence is exempt from the requirements under standards and qualifications required under paragraphs 2, 3, and 4 subsection 3(1)i if they hold certification by the Royal College of Physicians and Surgeons of Canada (RCPSC) or by the College of Family Physicians of Canada.

WES and ITPAC welcome steps that CPSO has already taken to ensure that enough qualified health professionals can become licensed, in line with [Schedule 2.1 of the RHPA](#), which states, “*It is the duty of the College to work in consultation with the Minister to ensure, as a matter of public interest, that the people of Ontario have access to adequate numbers of qualified, skilled and competent regulated health professionals.*”

More action is needed. Canada-wide, [nearly half](#) (49 percent) of physicians reported working beyond their desired capacity. In Ontario, nearly [three-quarters](#) of physicians surveyed by the Ontario Medical Association (OMA) in 2021 reported some level of burnout. And still, as of 2023, more than [two million](#) Ontarians (roughly 15 percent of the population) lack access to a family doctor.

At the same time, thousands of internationally educated health care professionals (IEHPs) in the province, including internationally trained physicians (ITPs), some with [decades of clinical experience](#), are underemployed and continue to face barriers to licensure and professional re-entry, including:

- Insufficient opportunities to obtain independent registration by completing residency training or Practice-Ready Assessment routes
- Insufficient opportunities to retain recency of practice, a requirement that must be met in order to apply for residency positions or Practice-Ready Assessment positions
- Prohibitive fees for assessments, accreditation, and licensing

As noted by the CPSO in its [response](#) to the government in August 2022, “licensure is one part of the broader solution.” Addressing ongoing challenges to health human resources and health workforce planning requires thoughtful collaboration between a range of stakeholders to:

- Expand access to residency training and postgraduate medical education opportunities for ITPs, something that the Ontario Medical Association [has called for](#)
- Implement competency-based models of assessment and licensing, such as Practice-Ready Assessment at a sufficient scale
- Introduce new classes of limited/defined registration, such as Clinical Assistant/Associate Physician, that provide opportunities for ITPs to retain recency of clinical practice and work toward independent licensure

WES and ITPAC have reviewed the CPSO’s proposed amendments and present a table format to respond to specific criteria.

Overview of Proposed Changes:

Criteria:	Details:	WES / ITPAC Specific Recommendations:
When the class is available for registration	<ul style="list-style-type: none"> • The amendments proposed by CPSO stipulate that Emergency Circumstances Practice registration may be issued when <i>“Council determines it is in the public interest that the College issue emergency certificates of registration to address emergency circumstances.”</i> • Note: CPSO presently defines “Public Health Emergency” as “a current or impending situation 	<p>CPSO should establish a clear definition of “emergency circumstance” and “public interest”; this may include updating the CPSO definition of “public health emergency” to include situations, such as currently, where a significant proportion of the provincial population is unable to access timely, appropriate care.</p> <p>CPSO should ensure that the emergency class of registration can be put into effect upon declaration of emergency by First</p>

	<p>that constitutes a danger of major proportions with the potential to result in serious harm to the health of the public.”</p>	<p>Nations, as well as by municipal, provincial, and federal governments.</p> <p>CPSO should establish oversight mechanisms for review of (A) when CPSO Council can declare “emergency circumstances,” or (B) when “emergency circumstances” should reasonably have been declared according to the CPSO’s own definition of “public health emergency,” but were not.</p>
<p>Minimum requirements that must be met to qualify for this class of registration</p>	<p>Applicants for Emergency Circumstances Practice registration must:</p> <ul style="list-style-type: none"> • (i) Have a degree in medicine • (ii) Have completed a year of postgraduate medical education at an accredited medical school • (iii) Be supervised by an independently licensed physician who is responsible for providing continuing care for patients attended by the applicant 	<p>Regarding (ii): This must be understood to include physicians who obtained their postgraduate medical training internationally, in line with Schedule 6 of Bill 106 (Pandemic and Emergency Preparedness Act, 2022); unless an exemption is made under the RHPA, a requirement of Canadian experience for registration with the CPSO would become void after implementation.</p> <p>CPSO must ensure that registration requirements for a specific class of registration (i.e., the requirement of postgraduate medical education in Canada) are accessible to applicants. At present, there are insufficient opportunities for internationally trained physicians to obtain a year of postgraduate medical education in Canada; in 2022, only 23.9 percent of international medical graduates (including Canadians who studied abroad) were matched to residency in the Main Residency Match through the Canadian Resident Matching Service (CaRMS), as compared with a match rate of 92 percent for graduates of</p>

		<p>Canadian medical schools.</p> <p>In light of this disparity, CPSO should accept a 12-month broad-based medical internship as acceptable postgraduate medical education. This would enable internationally trained general practitioners who have completed medical internships (not presently classified as postgraduate medical education) to meet this requirement.</p> <p>Regarding (iii): CPSO should ensure that qualified candidates for Emergency Class licensing are provided with necessary support to identify and secure a supervising physician, in line with the duty of the College under Schedule 2.1 of the RHPA.</p>
<p>The length of issuance and when the certificate expires</p>	<p>CPSO amendments for Emergency Circumstances Practice class stipulate that the certificate expires:</p> <ul style="list-style-type: none"> • One year from the date the certificate was issued or renewed; or • The 90th day after Council declares that the emergency circumstances have ended <p>Registrar may renew the certificate of registration for one or more periods, each period not to exceed one year, providing that Council has not declared that emergency circumstances have ended.</p>	<p>Emergency Circumstances Practice class of registration is not a sustainable solution to address health workforce challenges in the long term; introducing new classes of Emergency (or other types of Supervised/Short Duration) registration must be a step taken in combination with other measures that expand access to long-term, sustainable assessment and licensing pathways for ITPs.</p> <p>There is potential to structure Emergency Circumstances Practice registration, or an additional class of registration, in such a way that the period of supervised practice would serve as a period of assessment of ITPs' clinical competence, similar to what has been established under the Practice-Ready Assessment (PRA) model in other Canadian jurisdictions, under the model of</p>

		<p>“Defined Licensing” from the College of Physicians and Surgeons of Nova Scotia (CPSNS), or to what has been established in the nursing profession via the Supervised Practice Experience Partnership (SPEP) between the College of Nurses of Ontario (CNO) and Ontario Health.</p> <p>A similar program model should be established to match physicians who have yet to meet specific registration requirements (e.g., recency of practice or Canadian experience) with opportunities for supervised practice in hospital or community settings. This period of supervised practice could then serve as a period of assessment that could ultimately lead to decisions on eligibility for independent licensure.</p>
<p>How members of this class can transition to an independent practice certificate</p>	<p>CPSO-proposed amendments state that an individual who holds an Emergency Circumstances practice license is exempt from the requirements under “<i>paragraphs 2, 3 and 4 of subsection 3(1)</i>,” if that person holds certification by the Royal College of Physicians and Surgeons of Canada or by the College of Family Physicians of Canada.</p> <p>This provision refers to the Class of Certificates of Registration Authorizing Practice (Independent Licensure), which includes:</p> <ul style="list-style-type: none"> • (Paragraph 2) LMCC • (Paragraph 3) Either (A) a clerkship at an accredited medical school in Canada, (B) one year of postgraduate medical education at an accredited 	<p>The requirements under Paragraph 3 of subsection 3(1) of the Class of Certification of Registration Authorizing Independent Licensure (either a clerkship at an accredited medical school in Canada; one year of postgraduate medical education at an accredited medical school in Canada; or one year of active medical practice in Canada) would exclude many ITPs from transitioning from Emergency to Independent class of registration, as these requirements are not accessible to many ITPs.</p> <p>Emergency Circumstances Practice class of registration must be introduced in combination with, or as part of, measures that expand access to independent licensure for qualified physicians, whether domestically or</p>

	<p>medical school in Canada, or (C) a year of active medical practice in Canada that includes significant clinical experience pertinent to the applicant’s area of medical practice.</p> <ul style="list-style-type: none"> • (Paragraph 4) Certification by the Royal College of Physicians and Surgeons of Canada or by the College of Family Physicians of Canada 	<p>internationally trained.</p> <p>CPSO should structure the period of practice under the Emergency Circumstances Practice class of registration as a period of assessment under the supervision of an independent physician. For example, the CPSNS recently introduced the “Defined Licence” class of registration, whereby ITPs with a medical degree and LMCC and RCPSC certification eligibility “may practice medicine while pursuing the necessary qualifications for a Full licence.” This model of defined licensing is more equitable for ITPs and more sustainable for the health care system. CPSO should look to best practices implemented in other Canadian jurisdictions to inform registration practices and policies that are effective and equitable in the long term.</p>
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Conclusion:

Addressing the health human resource crisis facing Ontario requires long-term, sustainable solutions that fully leverage the training and experience of the highly skilled health care professionals already living in the province. Emergency Circumstances Practice class of registration is not a long-term, sustainable solution, and the requirements under 3.2 (1) of the proposed amendments will exclude many highly skilled internationally trained physicians from transitioning to Independent class and practicing independently in the long term.

CPSO should ensure that all proposed amendments to Section 5 of [Ontario Regulation 508/22](#) are aligned with legislation that prohibits requiring Canadian experience as a condition for registration with regulatory colleges; ensure that registration requirements (such as postgraduate medical training in Canada) are accessible to otherwise qualified candidates; and explore the extent to which best practices in other Canadian jurisdictions, such as Defined licensing from the CPSNS, can immediately be introduced in Ontario in order to expand pathways to licensure for ITPs and ensure a robust health care workforce in the long term.

About ITPAC:

The Internationally Trained Physicians Access Coalition (ITPAC) is an alliance of groups/organizations of internationally trained/experienced physicians (ITPs), as well as allied groups/organizations providing support to ITPs. The coalition works to galvanize the efforts of ITPs advocating for systems change, to enable their skills and experience to benefit the Canadian health care system and to enable ITPs to pursue careers in medicine or commensurate roles outside of medical practice.

ITPAC is composed of the following organizations:

- Access Alliance Multicultural Health and Community Services
- Association of International Physicians and Surgeons of Ontario (AIPSO)
- Community Matters Toronto
- Halton Multicultural Council (HMC Connections)
- International Doctors Network (IDN)
- Internationally Trained Medical Doctors Canada Network (iCAN)
- Internationally Trained Physicians of Ontario (ITPO)
- The Learning Enrichment Foundation (LEF)
- Niagara IMG/IEN Support Group
- WIL Employment Solutions

About WES:

World Education Services (WES) is a non-profit social enterprise that supports the educational, economic, and social inclusion of immigrants, refugees, and international students. For nearly 50 years, WES has set the standard for international academic credential evaluation, supporting millions of people as they seek to achieve their academic and professional goals. Through decades of experience as a leader in global education, WES has developed a wide range of tools to pursue social impact at scale. From evaluating academic credentials to shaping policy, designing programs, and providing philanthropic funding, we partner with a diverse set of organizations, leaders, and networks to uplift individuals and drive systems change. Together with its partners, WES enables people to learn, work, and thrive in new places.