



ACTION PLAN - YEAR 1 PROGRESS UPDATE

COLLEGE OF PARAMEDICS OF NOVA SCOTIA

As per the following Action Plan Progress Report and FRPA Review Officer comments, all areas of non-compliance (two identified), as originally identified in the March 17, 2022 FRPA review report, have now been addressed.

ACTION PLAN TIMELINES:



TIMELINES FOR ACTION PLAN PROGRESS UPDATES					
Due Date	Action Plan Deadline	Action Plan Progress Update 1	Action Plan Progress Update 2	Action Plan Progress Update 3	Action Plan Progress Update 4
	2022-02-07	2023-02-20			
Actual Completed Date	2022-02-19	2022-09-21			

ACTION PLAN:

ACTION PLAN – AREA 1:	Response to FRPA Review Question #3: “Registration of Interprovincial Applicants”.
FRPA SECTIONS:	Sections 3, 6, 7 (c), 9(a), 16(3)(b), (e) and (g)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>It has been determined that CPNS does not have (or has not communicated) a streamlined process to license applicants certified in another Canadian jurisdiction that regulates the same occupation. In particular, applicants already registered to practice in another jurisdiction must go through the same or similar application process as that of a new applicant (not previously registered).</p> <p>Section 3 of the <i>Fair Registration Practices Act</i> (FRPA) requires conformity with the <i>Canadian Free Trade Agreement</i> (CFTA). Chapter 7 of the CFTA states that certified workers have to be recognized as qualified to work by a regulatory body in another province or territory which regulates that occupation, without having to go through significant additional training, work experience, examination or assessment, unless an exception has been posted.</p>
REGULATOR ACTION PLAN:	<p>To demonstrate the College’s compliance with the registration of interprovincial applicants the College will:</p> <ol style="list-style-type: none"> 1) Conduct a review of its Registration and Licensure (RL) policies to confirm they are compliant with the <i>Canadian Free Trade Agreement (CFTA)</i>. The policies to be reviewed against the <i>CFTA</i> and the Paramedics Legislation include: <ol style="list-style-type: none"> a. RL 3.0 Licensure Criteria & Application (All Applicants) b. RL 4.0 Initial Registration Criteria & Application (All Applicants) c. RL 6.0 Absences from Paramedic Practice d. RL 16.0 Competence Assessment for applicants: 1) without practice experience; and 2) without completion of a Council approved entry-to-practice examination. 2) Conduct a review of the College’s website to confirm the information on the website is consistent with both the <i>CFTA</i> requirements for the registration of interprovincial applicants and the Paramedics Legislation. 3) Address any areas where the College’s RL policies are not compliant with the <i>CFTA</i>’s requirements for the registration of interprovincial applicants to ensure compliance and/or ensure the College effectively communicates via both written policies and its website compliance with the registration of interprovincial applicants per the <i>CFTA</i> and the Paramedics Legislation. 4) By early August 2022 demonstrate compliance with the registration of interprovincial applicants according to the <i>CFTA</i> and the Paramedics Legislation.
Year 1: Action Plan update. Due: 2023-02-20	<p>In June 2022, the College completed a review of its Registration and Licensure (RL) policies and website to confirm its published information adhered to the Canadian Free Trade Agreement (CFTA) and the Paramedics Act and Regulations.</p> <p>The policies reviewed against the CFTA, and the Paramedics Legislation included RL Policies:</p> <ol style="list-style-type: none"> 3.0 Licensure Criteria & Application (All Applicants) 4.0 Initial Registration Criteria & Application (All Applicants) 6.0 Absences from Paramedic Practice 16.0 Competence Assessment for applicants: 1) without practice experience; and 2) without completion of a Council approved entry-to-practice examination. <p>All RL policies are available on the Colleges website via the following hyperlink 195944 (cpns.ca)</p> <p>The review demonstrated distinct differences that provide a more streamlined process for applicants who are licensed in another Canadian jurisdiction. As demonstrated in RL policies 3.0 and 4.0, the applicant from another Canadian jurisdiction, who has never registered and licensed in Nova Scotia is not required to provide proof of program completion or entry to practice exam results because they hold a licence in another jurisdiction.</p> <p>Evidence of these differences exists as information on the College’s website which may be accessed via the hyperlink From another Canadian Jurisdiction: College of Paramedics of Nova Scotia (cpns.ca).</p>
FRPA Review Officer Comments (Oct. 4, 2022)	The above noted areas of non-compliance have been addressed.

ACTION PLAN – AREA 2:	Response to FRPA Review Question #11: “Internal Review Process”.
FRPA SECTIONS:	Sections 7(a), 10
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>The descriptions of the internal review process as referenced within CPNS policies (003, 004, 006 and 007) do not include sufficient detail to meet the requirements of Section 10 of the FRPA (https://novascotia.ca/lae/fair-registration-practices/). In particular, CPNS does not do any of the following:</p> <ul style="list-style-type: none"> • describe time frames associated with the internal review process; • describe opportunities the applicant has to provide new information and made submissions with respect to their internal review; • describe how internal review decisions are communicated to applicants and what information is included with the decision; • specify that anyone who acted as a decision-maker in respect of a registration decision cannot also act as a decision-maker in the internal review of that decision; and • provide sufficient information on the internal review process in a publicly accessible manner.
REGULATOR ACTION PLAN:	<p>To be completed by the Regulator – must include specific actions and dates for completion to entirely address the above noted areas of non-compliance.</p> <p>To demonstrate compliance with the requirement to have fully documented and transparent internal review process the College will:</p> <ol style="list-style-type: none"> 1) Conduct a review of several of its current Registration and Licensure (RL) policies for the purposes of determining if additional information inserted into said policies will bring the College in compliance with the requirements for the internal review process required to be compliant with question 11. The policies to be reviewed include: <ol style="list-style-type: none"> a) RL 3.0 Licensure Criteria & Application (All Applicants) b) RL 4.0 Initial Registration Criteria & Application (All Applicants) c) RL 6.0 Absences from Paramedic Practice 2) Contact other healthcare regulators to obtain copies of their internal review process for registration and licensure applicants. 3) Further develop current RL policies, or develop a new policy, that specifically details the College’s internal review processes for registration and licensure applicants. 4) Ensure information regarding the internal review process is easily accessible to the public via the College’s website. 5) By early August 2022 demonstrate compliance with the FRPA review process by having an internal review process policy for registration and licensure applicants that is open and transparent and having this information readily available on the College’s website.
Year 1: Action Plan update. Due: 2023-02-20	<p>In June 2022, the College took the necessary steps to ensure it had a fully documented and transparent internal review process that were compliant with the Paramedics Act and Regulations.</p> <p>To accomplish this, the College completed a review of its Registration and Licensure (RL) Policies while it also engaged in an environment scan obtaining information from other self-regulated health professions.</p> <p>The outcome of the review was the implementation of three new RL Policies including,</p> <ul style="list-style-type: none"> 17.0 Registration & Licensure Decision of the Registrar 18.0 Review of Registration & Licensure Decisions of the Registrar by the Registration Committee 19.0 Appeal of Registration & Licensure Decisions of the Registration Committee by the Registration Appeal Committee <p>These policies provide greater clarity for:</p> <ul style="list-style-type: none"> • The time frames associated with the internal review process. • The opportunities the applicant has to provide new information and make submissions with respect to their internal review. • How internal review decisions are communicated to applicants and what information is included with the decision. • Those who acted as a decision-maker in respect of a registration decision not also acting as a decision-maker in the internal review of that decision. • Providing sufficient information on the internal review process in a publicly accessible manner. <p>These policies are publicly accessible via the College's website and may be accessed via the hyperlink 195944 (cpns.ca).</p>
FRPA Review Officer Comments (Oct. 4, 2022)	The above noted areas of non-compliance have been addressed.



SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

X  _____

Name (print): Karl Kowalczyk

DATE: 2022-10-05