
Nova Scotia College of Medical Imaging and
Radiation Therapy Professionals
(NSCMIRTP)

Fair Registration Practices Act (FRPA)
Review Report
July 4, 2023

Province of Nova Scotia

EXECUTIVE SUMMARY

The *Nova Scotia College of Medical Imaging and Radiation Therapy Professionals* (NSCMIRTP) is specifically named in the *Fair Registration Practices Act* (FRPA or “the Act”) as a “regulating body” that is subject to the Act. Section 6 of the Act summarizes the “Duty” of each “regulating body”, including NSCMIRTP, as follows:

Duty of regulating body

6 *A regulating body has a duty to carry out registration practices that are transparent, objective, impartial and procedurally fair.*

The Review Officer, appointed under Section 13 of the Act and under the authority provided for under Sections 14 and 16 of the Act, facilitated a FRPA Review, which was initiated on February 2, 2023, and resulted in this final report. The purpose of this FRPA Review at the outset was:

- 1) To determine the current compliance status with the FRPA; and
- 2) If areas of non-compliance are identified, to facilitate a path back to compliance through the requirement to develop an Action plan containing specific actions and completion dates as well as the requirement of progress reports on that Action plan until compliance is achieved.

The current compliance status was determined based on NSCMIRTP’s responses to 10 review questions, as well as corroborating information on NSCMIRTP’s website (<https://nscmirtp.ca>). Upon review of this information, no compliance issues were identified and therefore no Action Plan was required. The review questions, NSCMIRTP’s responses, and the assessment of those responses based on compliance criteria are detailed in this report.

As required under Subsections 16(8) of the Act, another review will be conducted on NSCMIRTP’s registration practices within 5 years of the date of this report.

The collaboration and cooperation of the *Nova Scotia College of Medical Imaging and Radiation Therapy Professionals* throughout this review process is gratefully acknowledged.

Sincerely,



Frank Reinhardt
Review Officer, Fair Registration Practices Act (FRPA)

TABLE OF CONTENTS

EXECUTIVE SUMMARY ii

TABLE OF CONTENTS iii

1. INTRODUCTION 1

1.1. THE FAIR REGISTRATION PRACTICES ACT 1

1.2. OVERVIEW OF THE REGULATING BODY 1

2. QUANTITATIVE DATA - 2022 4

3. FRPA REVIEW QUESTIONS, RESPONSES AND COMPLIANCE ASSESSMENTS 5

3.1: INFORMATION AND REGISTRATION PROCEDURES 5

3.2: ASSESSMENT CRITERIA AND COMMUNICATION OF DECISION PROCESSES 20

3.3: INTERNAL REVIEW/APEAL PROCESS 23

4. ACKNOWLEDGEMENTS: 25

1. INTRODUCTION

1.1. THE FAIR REGISTRATION PRACTICES ACT

[The Fair Registration Practices Act](#) (FRPA; the Act) applies to 49 [regulatory bodies](#) in Nova Scotia, covering 85 occupations, including 21 compulsory trades. A regulatory body (regulatory authority or regulator) sets the standards and regulates how people practice as members of an occupation or trade. Everyone who practices within a regulated occupation or trade must register with the regulatory body.

The FRPA mandates that regulating bodies carry out registration practices that are transparent, objective, impartial and procedurally fair. Section 16(2) of the FRPA states: “Every regulating body shall review its registration practices in accordance with this Section and shall file a report on the results of the review with the Review Officer for the reporting period.” This review process is to occur as per the Act and if items are deemed to be noncompliant with the FRPA, an Action Plan is required to be completed by the regulating body. The intent of the Action Plan is to identify how the items of noncompliance are progressing to ensure compliance, fairness, and transparency, as required by the Act.

1.2. OVERVIEW OF THE REGULATING BODY

Name of Regulating Body:	Nova Scotia College of Medical Imaging and Radiation Therapy Professionals (NSCMIRTP)
Review Questions Due:	2023-06-01
Date Submitted:	2023-05-26

Regulatory Organization:

The Nova Scotia College of Medical Imaging and Radiation Therapy Professionals (NSCMIRTP) is a governing body established by the NSCMIRTP Act to regulate the practise of medical imaging and radiation therapy in Nova Scotia. The College's mandate is to ensure the public receives safe, effective, and ethical imaging and radiation therapy services. This mandate is achieved by registering only those medical imaging and therapy applicants that meet education and currency requirements, setting standards for practise and ethical conduct, monitoring and supporting registrants' continuing competence, and fairly investigating concerns raised about registrants' practise. Medical imaging and therapy professionals include radiological technologist, MRI technologists, diagnostic medical sonographers, radiation therapists and nuclear medicine technologists.

As Per section (4) of the NSCMIRTP Act In order to

- (a) serve and protect the public interest in the practice of the profession; and
- (b) subject to clause (a), preserve the integrity of the profession and maintain the confidence of the public in the ability of the profession to regulate itself, the College shall
- (c) regulate the practices of medical imaging technology and radiation therapy and govern its registrants through
 - (i) the registration, licensing, professional conduct and other processes set out in this Act and the regulations,
 - (ii) the establishment and promotion of standards of practice for its registrants,
 - (iii) the establishment and promotion of a code of ethics, and
 - (iv) the advancement and promotion of the practise of the profession; and
- (d) do such other lawful acts and things as are incidental to the attainment of the purposes and objects set out in this Section.

The NSCMIRTP is authorized via the NSCMIRTP Act, 2013 and NSCMIRTP Regulations of 2020. These are both posted to our website and links are provided here.

<https://nscmirtp.ca/assets/documents/NSCMIRTP-ACT.pdf> and <https://nscmirtp.ca/assets/documents/NSCMIRTP-Regulations-.pdf>. Since the last FRPA review our mandate has changed. We are now under a new act with a new name (old name was NSAMRT). We have added another professional group to our registrant pool (sonographers), and we no longer have a dual mandate of association and regulator. We are now solely a regulator.

Organizational Structure and Staffing

The NSCMIRTP is governed by a Board of Directors consisting of six elected registrants and three government-appointed public members. The Board is responsible for the governance and strategic planning of the College and delegates activities and responsibilities to committees and the Registrar. The College currently has three part-time employees, the ED/Registrar (30hrs/week), deputy registrar (15hrs/week) and an administrative position (15 hrs/week).

The College maintains committees for each regulatory program: Credentials, Investigations, Professional Practise, and Nominations. Members of these committees are registrants in good standing with the College and a public representative. The Chair of each committee is appointed by the board.

Occupational Profile

A basic overview of the medical professionals that we license is posted to our website at <https://nscmirtp.ca/about-us/disciplines-of-nscmirtp>. We issue licences for five different professions including MRI, Nuclear Medicine, Radiological Technology, Diagnostic Medical Sonography and Radiation Therapy.

Medical imaging and therapy professionals (MIRTPs) work predominantly in clinical roles in acute care facilities and private clinics. MIRTPs work with individuals of all ages performing both diagnostic and therapeutic procedures. MIRTPs may also work in non-clinical roles as researchers, educators, managers, consultants, PACs administrators, radiopharmaceutical production and/or program planners. In most provinces, MIRTPs are required to pass a national certification examination before they are eligible to practise independently. In the province of Nova Scotia, an MIRTP must be registered with the NSCMIRTP.

Types of Licenses/Certificates Issued

The College currently maintains four classes of registration: Active, Active with Conditions, Provisional (temporary), Provisional (temporary) with conditions. MIRTPs on the Active or provisional register without conditions have met all the requirements for registration and are entitled to the full practise of the discipline they are licensed in. MIRTPs on the active with conditions or provisional with conditions registry have not met all the requirements of practice and have specific conditions attached to the license. Typically, they have not met the currency and/or examination registration requirement and must practise under the supervision of an active MIRTP with no conditions of the same discipline. The College offers a full-year registration or a three-month temporary registration.

There is a full tab on the NSCMIRTP website dedicated to applicants which outlines the process for individuals seeking licensing at <https://nscmirtp.ca/applicants/become-an-mirtp>.

2. QUANTITATIVE DATA - 2022

Quantitative data is collected from regulating bodies each year by way of a data survey. The following is some of the information provided by the *Nova Scotia College of Medical Imaging and Radiation Therapy Professionals (NSCMIRTP)* through the 2023 survey, covering the 2022 year, in fulfillment of the quantitative reporting requirements under Section 15 of the FRPA:

Total Practicing Members*: 739
* As of December 31, 2022

Applications							
	Received in 2022	Decisions Rendered in 2022 ¹					In Progress at end of 2022 ¹
		Total	Successful	Unsuccessful	Withdrawn ²	Success Rate ³	
New	38	37	37	0	0	100%	0
Interprovincial	21	21	21	0	0	100%	0
International	5	4	4	0	0	100%	1
Total	64	62	62	0	0	100%	1

1. Regardless of when the applications were received (not necessarily equal to the number received in 2022).

2. Includes those withdrawn, set as "inactive" or closed.

3. Success Rate is the # of successful decisions divided by the total # of decisions (excludes in-progress).

Internal Reviews Conducted in 2022*: 0

* "Internal Reviews" are reviews of registration decisions conducted by the Regulating Body at the request of unsuccessful applicants (appeals). This Regulating Body reported that no "Internal Reviews" were completed in 2022.

Top 5 Provinces of Origin* of Interprovincial Applicants:		
Ontario	9	43%
Newfoundland	3	14%
British Columbia	3	14%
Manitoba	2	10%
Alberta	2	10%
Other	2	10%
Total	21	100%

* Some Applicants may be from multiple Provinces

Top 5 Countries of Origin* of International Applicants:		
U.S.A	1	20%
Egypt	1	20%
Japan	1	20%
Brazil	1	20%
Phillipines	1	20%
Other	0	0%
Total	5	100%

* Some Applicants may be from multiple Countries

Average Application Processing Times (# of Days)			
	By Regulating Body ¹	By Third Party Assessors ²	Total ^{1,3}
New	5	N/A	5
Interprovincial	5	N/A	5
International	5	N/A	5

1. Average length of time from receipt of a complete application to the time a decision was communicated to the applicant.

2. Average length of time for Third-Party Assessors to assess the equivalence of qualifications.

3. Due to the concurrent nature of application processing times, "total" is not necessarily equal to a summation of processing times by the regulating body and third parties.

3. FRPA REVIEW QUESTIONS, RESPONSES AND COMPLIANCE ASSESSMENTS

As per Section 16 of the Act, the registration practices of a regulating body must be reviewed, and a public report produced. The FRPA Program works with regulatory bodies to assess the registration practices against the compliance criteria. The *Nova Scotia College of Medical Imaging and Radiation Therapy Professionals* (NSCMIRTP) responses to the FRPA Review questions are detailed below, along with the review findings determined by the Review Officer in accordance with the Act.

3.1: INFORMATION AND REGISTRATION PROCEDURES

This section assesses how and what information is provided to applicants during the registration process. The registration process includes the actions required to be taken by individual applicants, and any documentation required to be submitted, which will be used to assess an application for registration.

QUESTION 1 - REGISTRATION PROCESS, REQUIREMENTS AND COMMUNICATIONS

The following question is broken into three parts (A, B and C), one for each of the three application types, as follows:

A: “New Applicants”

- Those who are only including Canadian credentials in their application to apply for registration (licensure) and are not currently registered (licenced) to practice anywhere in Canada.

B: “International Applicants”

- Those who are including international credentials in their application to apply for registration (licensure) and are not currently registered (licenced) to practice anywhere in Canada.

C: “Interprovincial Applicants”

- Those who are currently registered (licenced) to practice elsewhere in Canada (outside of Nova Scotia).

The response to Part A should be fully detailed, while the responses to Parts B and C only detail any differences from Part A.

QUESTION 1A (REGISTRATION OF “NEW APPLICANTS”)

Using the table below, explain, in detail, the registration process and requirements for “New Applicants” (see definition above) and how this information, including “*the length of time that the registration process ...usually takes;*”, is communicated to these applicants and those who only “*intend to apply*” (e.g., by making the information publicly available). Please answer separately for each license/registration type (eg. full, partial, restricted, student etc.).

Note: Subsections A through F below are identical and are only provided to allow for the possibility that multiple license/registration types are issued. If there is only one license type, use only Subsection ‘A’. For efficiency, after fully reporting on the first licence type in Subsection ‘A’, for any subsequent licence types, it is acceptable to report on only the differences. (e.g., for the qualifications of the licence type reported in Subsection ‘B’, it would be acceptable to report “*Same as Subsection ‘A’ except...*”.

RESPONDENT ANSWER	A. LICENSE TYPE	Active No Restrictions
	QUALIFICATIONS (LIST ALL)	See Information Below
	DOCUMENTATION (LIST ALL)	See Information Below
	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	<p>All process information and required documentation is available here: https://nscmirtp.ca/applicants/canadian-educated-applicant</p> <p>1. Application for registration Complete an online application and submit supporting documentation. https://members.nscmirtp.ca/apply/initial</p> <p>2. Compile required supporting documentation Applicants for registration must be able to demonstrate that they meet the following registration requirements:</p> <p>A) Proof of completion of a Canadian accredited MRT or DMS program uploaded with your application. Acceptable proof includes:</p> <ul style="list-style-type: none"> • an official transcript from the Canadian accredited program or • A picture of your degree/diploma or • An original letter sent from the registrar’s office or dean/director of program from the institution of study verifying completion. <p>B) Proof of successful completion of National Licensing Exam in respective discipline. This exam is administered by either the Canadian Association of Medical Radiation Technology (CAMRT) or Sonography Canada. A copy of exam result, copy of active certification or letter from certification body is required as evidence that you have successfully completed the exam.</p> <p>C) Proof of Identity</p>

Your full legal name must be provided on your application along with preferred name used in practice, if different. Both names will appear on the NSCMIRTP's public registry.

Evidence required:

Government issued photo ID. This can be in form of a driver's license, government identity card, or current passport.

*You must list all names that you have previously practiced under.

*If any of the documents in your application were issued under a previous name, you must include an official document (such as a marriage license etc...) that verifies your name change.

D) Eligibility to work in Canada

To be employed as a medical imaging or radiation therapy professional in Nova Scotia, you must have legal authorization to work in Canada. Only Canadian citizens, permanent residents of Canada, and individuals with Canadian work permits have the right to work in Canada.

Official documentation includes:

- a copy of a Canadian birth certificate or
- a Canadian passport or
- proof of landed immigrant resident status or
- copy of a valid work permit.

E) Demonstration of good conduct

The NSCMIRTP has an obligation to protect the public and needs to be satisfied that applicants do not pose a danger to patients and families. At the time of initial application, individuals must provide a vulnerable sector check (VSC).

Additionally, the online application will require that you declare any of the following:

- Any disciplinary finding as an MIRTP or in another profession in any Canadian province.
- Conviction(s) of a criminal, drug or traffic offense, excluding minor traffic offenses, such as parking or speeding.
- Any finding of liability in a civil proceeding.
- If you are currently under criminal investigation or have a pending criminal or civil court date.

If the answer is "yes" to any of the declarations, the NSCMIRTP will ask for more information, such as a transcript of the criminal record. The NSCMIRTP will review all information submitted to determine eligibility for licencing and, if applicable, to determine if conditions should be imposed on your licence.

F) Currency

Practicing medical imaging and radiation therapy is important to maintain your skills and keep up to date with changes in practice.

Applicants meeting one of the criteria below applications are deemed to meet currency requirements.

		<ul style="list-style-type: none"> • Graduating from an approved MIRTP program in the past 5 years. Or • Completing a recognized refresher program within the past 18 months. Or • Meeting the currency hours as laid out in the currency policy of NSCMIRTP https://nscmirtp.ca/assets/Currency-Hours-Requirements..pdf <p>Current/recent employer information must be entered on the application form. If deemed necessary, the NSCMIRTP's Registrar may request a letter or record of employment from an employer in the past 5 years stating your period of employment as an MIRTP and the hours you worked each year.</p> <p>G) Proof of Professional Liability Insurance (PLI) In accordance with PLI Policy, each applicant must present evidence they carry personal liability insurance. Each policy must contain limits of a minimum of \$2,000,000 per claim/\$5,000,000 aggregate.</p> <p>This proof can be in the form of a copy of an insurance card/policy. If you are licensed as an MRT and a DMS, one policy will cover both areas of practice.</p> <p>H) Jurisprudence Completing the jurisprudence module helps to ensure applicants are aware of the legislation that governs their practice in Nova Scotia. After reading the module applicants are directed to 40 open booked non-timed questions to verify their understanding of the content.</p> <p>3. Payment of fees The annual NSCMIRTP registration fee is \$450 (prorated to \$225 for those registering May 1st onward), and the initial application fee is \$100. Payment may be made by cheque, credit card or money order, payable to the NSCMIRTP, in Canadian funds.</p>
	<p>COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)</p>	<p>This information is available to applicants via the website. College staff are also available to review process with applicants on the phone, by email or by appointment in the office.</p> <p>Website Link: https://nscmirtp.ca/applicants/canadian-educated-applicant</p> <p>Initial Application Link: https://members.nscmirtp.ca/</p> <p>Guidebook: https://nscmirtp.ca/assets/documents/Canadian-Non-Labour-Mobility_Application-Guide.pdf</p> <p>Polices Related to Registration and Licensing https://nscmirtp.ca/resources/nscmirtp-polices-and-position-statements</p>

		<p>Vulnerable Sector Check https://nscmirtp.ca/assets/documents/NSCMIRTP-Request-for-VSC-Letter.pdf</p> <p>Jurisprudence Module https://nscmirtp.ca/assets/documents/Jurisprudence-Module-Master.pdf</p> <p>Once an application is submitted the applicant gets automated verification that the application was received. A review of applications is done on average 2-3x/week. Once reviewed the applicant receives an email outlining any deficiencies in the application and what is needed to correct them. Applicants are also directed to the resources to complete the jurisprudence module. Applications are re-reviewed when notification is received that an application has been updated. Once all required documents are submitted and the jurisprudence module is completed annual fees are charged and the licence is approved. Individuals gets an automatic email stating their licence has been approved and they are able to legally work as a MIRTP in the province of Nova Scotia. A standard letter welcoming them to the College and outlining how the college communicates with registrants and expectations of registrants is also sent.</p>
	<p>B. LICENSE TYPE</p>	<p>Active with Restrictions</p>
	<p>QUALIFICATIONS (LIST ALL)</p>	<p>Same As A</p>
	<p>DOCUMENTATION (LIST ALL)</p>	<p>Same As A</p>
	<p>REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)</p>	<p>Same As A</p>
	<p>COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)</p>	<p>The only difference would be that some eliminate of the registration process would indicate that a restriction needs to be applied to the license. This may be as a result of something that came to light in the VSC, or something listed on their work visa etc.... This default would be to make the condition public on the registry unless there was a legal/policy reason that would direct that the condition is not publicly posted.</p>
	<p>C. LICENSE TYPE</p>	<p>Provisional (temporary) no Restrictions</p>
	<p>QUALIFICATIONS (LIST ALL)</p>	<p>Same as "A"</p>
	<p>DOCUMENTATION (LIST ALL)</p>	<p>Same as "A" plus documentation to support the need for a temporary license rather than an annual license. i.e., working a locum position,</p>

REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	Same as “A” except fees are reduced to \$225 from \$450 for a temporary license. If a request to extend a temp license no conditions is received than the license is flipped to a full active license and the difference in fees must be paid.
COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)	Same as “A” There would also be an additional email reminding them of the expiry date of the license including process and cost to switch to a full license if needed.
D. LICENSE TYPE	Provisional (temporary) with restrictions
QUALIFICATIONS (LIST ALL)	For new graduates who are waiting to write the national exam the NSCMIRTP will grant a temporary provisional license. The requirements are the same as above except that instead of proof of successfully completing the exam proof of registration to write the next sitting go the exam is required. It is a conditional license requiring indirect supervision by a licensed MIRTP in good standing in the same discipline. Both the applicant and the employer must sign a letter of acknowledgement as part of the conditional licensing. Once the exam is written and results are available the license is converted to a full active if the individual passes and if they fail the license expires and they are no longer eligible for a temporary licensing until such time as they pass the national entry to practice exam
DOCUMENTATION (LIST ALL)	Same as “A” except for the following changes. If it is a new grad temp license instead of proof of passing the entry to practice exam the must provide proof of being registered to write the next sitting of the national exam. They must also sign a letter of acknowledgement. https://nscmirtp.ca/assets/documents/New-Grad_Acknowledgement-Letter-fillable.pdf
REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	Same as “A”
COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)	Same as “A”

QUESTION 1B (REGISTRATION OF INTERNATIONAL APPLICANTS)

Does the registration process and requirements for “international applicants” (see definition above) differ from that of “New Applicants” (as described above under Question 1A)?

If so, please describe these differences, including any allowances, exemptions and/or accommodations available to these applicants and how these differences are communicated to them.

RESPONDENT ANSWER

- Yes
- No

If yes, describe the differences (include any relevant web links, if any):

The full process in 1A applies to international applicants with exception of needing to graduate from an accredited Canadian program. In place of this, international applicants must first go through a credentials assessment process. This process is outlined on our website at <https://nscmirtp.ca/applicants/internationally-educated-new-applicants> . For all international applicants who have not had their credentials assessed in Canada the first step is to sign an acknowledgment letter that outlines the requirements for successful licensing <https://nscmirtp.ca/assets/documents/IEMIRTP-Acknowledgement.pdf> or <https://nscmirtp.ca/assets/documents/IEDMS-Acknowledgement.pdf> . Please note both of these forms are in the process of being updated to reflect a recent change in policy that allows for international applicants to apply for a temporary conditional licensing once they have registered to write the national entry to practice exam.

Once a signed letter is received, MRT applicants are linked to the national Association (CAMRT) who will perform the assessment. The process and required forms for the assessment are on the CAMRT webpage at <https://www.camrt.ca/certification-4/internationally-educated-medical-radiation-technologists-iemrts/assessment-process/> . There is a written agreement between the NSCMIRTP and CAMRT related to the assessment of international applicants and national entry to practice exam.

For Sonography applicants the NSCMIRTP has a signed agreement with the national association, Sonography Canada related to the assessment process and national exam <https://sonographycanada.ca/certification/entry-to-practice-exams>. Currently, their assessment process does not meet FRPA standards, so the NSCMIRTP is not using it until it meets requirements. The current process is to hire an assessor from Sonography Canada to do assessment to ensure an experienced competent assessor is performing the assessment but to use the CAMRT process to ensure the process meets FRPA requirements and that Sonography and MRT applicants are treated equitably.

Documents that must be submitted for credential and currency assessment include:

- Completed “Application for Assessment” form.
- Verification of completion of a medical radiation technology program in one of the following disciplines: radiological technology, nuclear medicine technology, magnetic resonance, radiation therapy. A diploma or degree certificate (notarized copy) is required.
- An official transcript of marks from your education program in medical radiation technology (notarized copy).
- Curriculum or course outline of your medical radiation technology program indicating the amount of time spent in both the theoretical and clinical components of your program. The curriculum or course outline must provide a:
 - Detailed list of courses and a description of the content of each course (photocopy of education institution syllabus)
 - Description of how you were evaluated on both the theory and clinical components of the program.

- Clinical Assessment Checklist of work experience following graduation from education program. Work experience must be within the past five (5) years in the discipline in which you are applying.
- Confirmation of employment letter from your most recent or current employer. This letter must be written on the letterhead used by the institution and must confirm your last date of employment, number of practice hours and a reference regarding your practice as a medical radiation technologist. The letter must supply employer's contact information; e-mail or paper accepted. If you are a recent graduate with little or no work experience and you cannot provide an employment letter, your credentials will be considered for assessment and eligibility to write the CAMRT exam within 5 years from the date of your graduation.
- Evidence of registration with an association / society / regulatory body for the specific discipline if you are registered.
- Letter of reference attesting your good character from someone who has known you for a minimum of two (2) years. The referee must sign the letter, print their name, and provide contact information.
- Evidence of language fluency if total medical radiation technology education program, that is both theory and clinical components, were not conducted in English or French. (Original copy of language test results required.)
- Relevant evidence of continuing professional development activities.

Effective March 15th, 2023 international applicants who have been granted access to the national entry to practice exam are now eligible for temporary conditional licensing with the NSCMIRTP. This would be a conditional license. An individual licensed under this provision will require direct supervision of practice at all times by a licensed MIRTP of the same discipline who is in good standing with the College and protected titles cannot be used. The temporary license will stay in effective until results of the national exam(s) are released. If successful, the license will be updated to a full active license without conditions. If unsuccessful the license will expire unless approval for an extension is granted by the credentials committee.

Website Link: <https://nscmirtp.ca/applicants/internationally-educated-new-applicants>

Guidebook: <https://nscmirtp.ca/assets/documents/International-application-guide.pdf>

Visual Pathway: https://nscmirtp.ca/assets/documents/Chart_IEMIRTP-Registration-Pathway-Visual.pdf

CAMRT Assessment: <https://www.camrt.ca/certification-4/internationally-educated-medical-radiation-technologists-iemrts/assessment-process/>

CAMRT Exam: <https://www.camrt.ca/certification-4/graduates-of-canadian-accredited-programs/writing-the-certification-exam/certification-exam-registration/>

Sonography Canada Exam: <https://sonographycanada.ca/certification/entry-to-practice-exams>

QUESTION 1C (REGISTRATION OF INTERPROVINCIAL APPLICANTS)

Does the registration process and requirements for “interprovincial applicants” (see definition above) differ from that of “New Applicants” (as described above under Question 1A)?
 For example, are the process and requirements somehow “streamlined” to comply with the [Canadian Free Trade Agreement](#) (Chapter Seven - Labour Mobility, pages 83-88), as required under Nova Scotia’s [Canadian Free Trade Agreement Implementation Act](#)?

If so, please describe these differences, including any allowances, exemptions and/or accommodations available to these applicants and how these differences are communicated to them.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe the differences (include any relevant web links, if any): Those applying through CFTA do not need to provide evidence of MIRTP education or passing the national entry to practice exam but must have their current regulator send us a signed CFTA form that all MIRTP regulators in Canada have adopted. The rest of the process is the same as in 1A.
--------------------------	--

QUESTION 1 (Parts A, B AND C) REVIEW FINDINGS (To be completed by the FRPA Review Officer):

REVIEW FINDINGS	Compliance Criteria (pursuant to Sections 3, 7(b) and (c), 9(a), 16(3)(a), (b) and (g) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
(To be completed by the FRPA Review Officer)	<ul style="list-style-type: none"> provides information about its registration practices in a clear and understandable form, including descriptions of any differences for applicants with international qualifications and for those who are licenced in other Canadian jurisdictions; 	YES
	<ul style="list-style-type: none"> Provides “information [to applicants and potential applicants] about the length of time that the registration process ...usually takes”; 	YES
	<ul style="list-style-type: none"> explains the qualifications required for registration; 	YES
	<ul style="list-style-type: none"> identifies documentation of qualifications that must accompany an application; 	YES
	<ul style="list-style-type: none"> explains the registration process and how requirements for registration are to be met; 	YES
	<ul style="list-style-type: none"> explains how information is communicated; and 	YES
	<ul style="list-style-type: none"> provides information in a publicly accessible manner. 	YES

Comments, to be completed by the FRPA Review Officer:

Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (<https://nscmirtp.ca/>) on June 22, 2023.

QUESTION 2 (REGISTRATION PROCESS FEES)							
Do you charge a fee for the registration process? If so, describe the fee and explain how this information is communicated to applicants. Include a link to information published in the public domain. If there is a third-party process with associated fees, please explain. Provide a link to any published information.							
RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain: We currently charge a \$100 application fee. This is communicated on the on the fee page of our website. Additionally, it is posted on the online application. Website: https://nscmirtp.ca/applicants/registration-and-application-fees Online Application: https://members.nscmirtp.ca/apply/initial Policy on Website: https://nscmirtp.ca/assets/documents/NSCMIRTP-Registration-Related-Fees.pdf						
	REVIEW FINDINGS (To be completed by the FRPA Review Officer)	<table border="1"> <thead> <tr> <th>Compliance Criteria (pursuant to Sections 7(f) and 16(3)(d) of the FRPA): Requirement that the regulating body:</th> <th>Compliant? (YES/NO)</th> </tr> </thead> <tbody> <tr> <td>• provides information setting out any fees for registration in a clear and understandable form;</td> <td>YES</td> </tr> <tr> <td>• provides information about fees in a publicly accessible manner.</td> <td>YES</td> </tr> </tbody> </table>	Compliance Criteria (pursuant to Sections 7(f) and 16(3)(d) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)	• provides information setting out any fees for registration in a clear and understandable form;	YES	• provides information about fees in a publicly accessible manner.
Compliance Criteria (pursuant to Sections 7(f) and 16(3)(d) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)						
• provides information setting out any fees for registration in a clear and understandable form;	YES						
• provides information about fees in a publicly accessible manner.	YES						
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP's website (https://nscmirtp.ca/) on June 22, 2023.							

QUESTION 3 (ALLOWANCE FOR ALTERNATIVE DOCUMENTATION)

Are there any situations where the standard required documentation cannot be reasonably obtained by an applicant, that alternative documentation may be acceptable to the regulating body? (Yes/No)

If yes, please detail what alternative documentation may be accepted in what situations and in place of what standard documentation. How is this information communicated to applicants? If available, please provide a link to where this information is published in the public domain.

<p>RESPONDENT ANSWER</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain: Applicants may also submit alternative documentation under our Insufficient Information Policy if they cannot reasonably obtain original documentation. https://nscmirtp.ca/assets/documents/Insufficient-Application-Information.pdf Vulnerable Sector Check: Applicants from certain Canadian jurisdictions or international jurisdictions may not be able to obtain a vulnerable sector check. As a result, the College will accept the highest level of Criminal Records Check that is available.</p>	
<p>REVIEW FINDINGS (To be completed by the FRPA Review Officer)</p>	<p>Compliance Criteria (pursuant to Sections 7, 9 and 16(3)(c) of the FRPA): Requirement that the regulating body:</p> <ul style="list-style-type: none"> • provides clear and understandable information with respect to acceptable alternative documentation; and • advises applicants on what alternative information may be supplied when they cannot reasonably obtain the standard documentation; 	<p>Compliant? (YES/NO/ N/A)</p> <p>YES YES</p>

Comments, to be completed by the FRPA Review Officer:
 Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (<https://nscmirtp.ca/>) on June 22, 2023.

QUESTION 4 (SUPPORT PROVIDED TO APPLICANTS DURING THE REGISTRATION PROCESS)

Do you provide any support to applicants during the registration process? If so, describe the type of support provided. (Examples: contact information, explanation of registration requirements, translation services, etc.). How is information about supports communicated to applicants? Provide a link(s) to information published in the public domain.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>If yes, describe: The NSCMIRTP supports applicants at all points of the application process. Examples of our support to applicants include:</p> <p>1) Website Information: Information is available on our website, including specific information about required documentation, access to registration policies, and required forms.</p> <p>2) Telephone: We provide phone support to our applicants by clarifying the registration requirements, required supporting documentation, and their application status.</p> <p>3) Printable Material: PDF copies of the College documents including but not limited to policies, and Guidebooks to registration process.</p> <p>4) NICHE: International applicants are linked to NICHE for possible wrap around support in the process and numerous websites links are on the website for support services for international applicants.</p> <p>5) In Person: Applicants can make an appointment to meet in person to discuss the application process</p> <p>6) Other: College staff e-mails applicants that are missing supporting documentation or have an incomplete application to remind them of what they still require. E-mails are sent from the College staff directly. This will include links to required resources where applicable. Automatic e-mails indicating registration application updates are also sent via our registration database system when review of application is completed.</p>
--------------------------	--

REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(e) and 16(3)(k) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	• provides support to the applicant during the registration process;	YES
	• describes the type of support provided to the applicant during the registration process; and	YES
	• provides information about the type of support provided to applicants during the registration process in a publicly accessible manner.	YES

Comments, to be completed by the FRPA Review Officer:
 Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (<https://nscmirtp.ca/>) on June 22, 2023.

QUESTION 5 (ACCOMMODATION POLICIES FOR APPLICANTS WITH A PHYSICAL OR MENTAL DISABILITY)

Do you have existing accommodation policies for applicants with a physical or mental disability? (Yes/No)

If yes, describe these existing policies, including:

- how an applicant would request an accommodation;
- how requests are considered; and
- how these policies are communicated to “...*individuals ...applying or intending to apply for registration...*” as required under Section 7(e). If this is done by posting to the website, please include the link.

RESPONDENT
ANSWER

- Yes
 No

If yes, describe:

The NSCMIRTP via our third-party provides have processes to allow for accommodations.

CAMRT Accommodations: <https://www.camrt.ca/certification-4/graduates-of-canadian-accredited-programs/writing-the-certification-exam/special-needs-accommodations/>

CAMRT other policies related to national exam: <https://www.camrt.ca/certification-4/graduates-of-canadian-accredited-programs/>

Sonography Canada (SC) Accommodations: found on [page 8 of the guidebook](#).

Sonography Canada strives to make their examinations available to any person who has met the prerequisites and is deemed eligible. Sonography Canada recognizes the diversity of candidates and strives to facilitate access to the Sonography Canada exams regardless of ability, religious obligation, or other barriers. If a disability or an impairment, religious obligation or other barrier limits the candidate’s ability to participate in the exam as intended, a request for exam accommodations can be submitted to Sonography Canada. Exam accommodations may be an adjustment or modification of the standard testing conditions designed to allow for a candidate’s participation without compromising the validity or integrity of Sonography Canada examination(s) or providing an unfair advantage to the candidate or imposing undue hardship for Sonography Canada.

The Exam Accommodation Request Form must be completed and submitted at the time of exam application.

<https://sonographycanada.ca/app/uploads/2019/09/Accommodation-Fillable.pdf> Please include a description of the accommodation required and suggestions for its achievement. For accommodations related to disability or impairments, one of the following MUST also be provided as supporting documentation:

- A letter on official school letterhead and signed by your Program Representative describing similar accommodations that were provided to you when writing examinations during your diagnostic medical sonography educational program.

Or if you have not received similar accommodation while attending your educational program, please submit the following:

- A letter on official office letterhead signed by a healthcare or counselling professional specializing in your disability which:

	<p>o Indicates that this specialist completed an assessment of your disability within the last five (5) years.</p> <p>o Describes in detail the identity (diagnosis) and the extent of your disability.</p> <p>o Describes clearly your current functional limitation(s).</p> <p>o Both recommends and supports your request for the accommodation as indicated in this form.</p> <p>Sonography Canada reserves the right to request additional documentation, if necessary, to complete its assessment of an accommodations request. Submissions will be reviewed in full, and Sonography Canada will collaborate with the candidate and the exam administration organization in an attempt to ensure that the accommodations can be made available. Certification Examinations Candidate Guide</p> <p>A final decision regarding the accommodations request will be forwarded to candidates by email no later than 2 weeks prior to the examination date. Each request will be handled on a confidential and individual basis. Please note that incomplete forms and documentation will not be processed by Sonography Canada. Candidates must ensure that they have provided all the requested information and that forms are fully completed and legible.</p> <p>NSCMIRTP Accommodations: Jurisprudence Module: Is open booked and not timed thereby removing need for most accommodations. Upon request we will supply a paper copy of the module questions. Application Form: Upon request we will supply a paper copy of the application form.</p>	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(e), and 16(3)(h) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	<ul style="list-style-type: none"> describes existing accommodation policies, if any, for applicants with a physical or mental disability, including <ul style="list-style-type: none"> - how an applicant would request an accommodation; and - how requests are considered. 	YES
<ul style="list-style-type: none"> provides information about its accommodations policies, if any, to "...individuals ...applying or intending to apply for registration..." (eg. by posting to its website). 	YES	
<p>Comments, to be completed by the FRPA Review Officer:</p> <p>Although the links provided are third-party links, these links are also accessible through NSCMIRTP’s website (https://nscmirtp.ca/) and it is clear that the accommodation policies described apply to NSCMIRTP’s registration process.</p> <p>Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (https://nscmirtp.ca/) on June 22, 2023.</p>		

QUESTION 6 (ACCESS TO REGISTRATION RECORDS)

Do you have a documented process by which an applicant can request access to their registration records? If so, describe how an applicant can make this request, any exclusions to information that can be provided, and any fees that may apply. Include a link(s) to any published information, if available.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: We have Access to Registration Records Policy posted to our website at https://nscmirtp.ca/assets/documents/Access-to-Registration-Records.pdf
--------------------------	--

REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 12(1) through (5) and 16(3)(j) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	• has an established process by which an applicant can make a request in writing for access to their registration records; and	YES
	• describes how an applicant can make a request, any exclusions to information that can be provided, and any fees that may apply.	YES

Comments, to be completed by the FRPA Review Officer:
 Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (<https://nscmirtp.ca/>) on June 22, 2023.

3.2: ASSESSMENT CRITERIA AND COMMUNICATION OF DECISION PROCESSES

This section assesses how the regulating body evaluates applications and how this process, including registration decisions, are communicated to applicants.

QUESTION 7 (ASSESSMENT CRITERIA)

Explain, in detail, the criteria used by the regulating body to assess if an applicant has met requirements to be registered/licensed. (Examples: competencies, pass marks, experience standards, etc.) Also, explain how this information is communicated to applicants. Provide a link(s) to information published in the public domain.

If there is a third-party assessor involved in the process, describe their role in the space provided.

RESPONDENT ANSWER

Explain the criteria used for assessment and how the information is communicated:

The registration process for the NSCMIRTP is outlined in policies posted to the website <https://nscmirtp.ca/resources/nscmirtp-policies-and-position-statements>. The step-by-step process is outlined for each registration category on our website and clearly indicates the specific evidence required for the applicant to meet the requirements. This information is also posted in registration guidebooks, which are posted to the website for each category of license.

Canadian Educated Non-CFTA Applicants

<https://nscmirtp.ca/applicants/canadian-educated-applicant>

CFTA Applicants

<https://nscmirtp.ca/applicants/canadian-educated-applicants-currently-registered-in-another-regulated-jurisdiction>

International Applicants

<https://nscmirtp.ca/applicants/internationally-educated-new-applicants>

College staff review the completed application form and supporting documentation, against the specific registration policy/regulations to determine if the applicants has provided sufficient evidence to meet the registration requirements. Applicants that have not submitted required documentation, or documentation that meets our requirements, are contacted to clarify requirements and if applicable, provided with an opportunity to provide alternate acceptable documentation.

Is a third party involved in the assessment process?

Yes

No

If yes, name the third-party(s) and describe their role:

Canadian Association of Medical Radiation Technologist (CAMRT) conducts the assessment for substantive similarity for 7/10 provinces in Canada (minus Quebec, Ontario, and Alberta). This assessment determines weather the internationally educated MRT applicant meets education and scope of substantive practice similarity to that of Canadian educated applicant.

	Sonography Canada consultant -conducts the assessment for substantive similarity for 8/10 provinces in Canada (minus Quebec, and Ontario). This assessment determine weather the internationally educated DMS applicant meets education and scope of practice equivalency to that of Canadian educated applicant.	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(d), 16(3)(b) and (i) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	• describes all criteria used to assess whether the requirements for registration have been met;	YES
	• explains how information is communicated;	YES
	• provides information in a publicly accessible manner; and	YES
	• describes the role of third-party assessors (if applicable).	YES
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (https://nscmirtp.ca/) on June 22, 2023.		

QUESTION 8 (COMMUNICATING REGISTRATION DECISIONS)		
Explain how you communicate registration decisions to applicants who are: a) successful; and b) not granted registration. Include what information is provided with each type of decision.		
RESPONDENT ANSWER	Explain the registration decision communication process:	
	a) Successful applicants: Successful applicants are notified by multiple methods 1) Immediate notification via the registration database system on approval 2) Automatic letter of welcome sent from the database once approved.	
	b) Applicants not granted registration: Applications that are not granted registration/licensing are also notified by multiple methods: 1) Immediate notification via the registration database system, 2) Email a letter from the Registrar or Chair of the credentials committee to the applicant with the decision, reasons, and appeal process. Where possible the Registrar will also notify the applicant of steps that can be taken to obtain registration.	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 8(b), (c), (d), 10(1) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	• where registration is granted, provides written confirmation within a reasonable time to applicants;	YES
	• where registration is not granted: ○ provides written decisions that include reasons to applicants within a reasonable time respecting registration decisions;	YES

	<ul style="list-style-type: none"> ○ provides, where practical, information respecting measures or programs that may be available to assist unsuccessful applicants in obtaining registration at a later date; and 	YES
	<ul style="list-style-type: none"> ○ informs the applicant of the internal review process and of the procedures and time frames for the internal review. 	YES
<p>Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (https://nscmirtp.ca/) on June 22, 2023.</p>		

3.3: INTERNAL REVIEW/APEAL PROCESS

Section 10 of the Act requires that regulating bodies provide unsuccessful applicants with a clear process to appeal a registration decision. Section 11 requires that those involved with reviewing registration decisions receive training on conducting such reviews. This section assesses compliance with these requirements.

QUESTION 9 (INTERNAL REVIEW PROCESS)

Do you have a documented internal review process for applicants who disagree with the registration decision?

If yes, describe the process including:

- time frames throughout the process; and
- opportunities available to the applicant to provide new information and make submissions with respect to their internal review; and
- how internal review decisions are communicated to applicants and what information is included with the decision; and
- a statement that no one who acted as a decision-maker in respect of a registration decision can act as a decision-maker in an internal review of that decision; and
- if available, provide a link to this information published in the public domain.

Internal review: a rehearing, reconsideration, review or appeal or other process provided by a regulating body in respect of the merits of a registration decision, regardless of the terminology used to describe the process.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, explain: The NSCMIRTP provides an internal review process for applicants who disagree with the registration decision. It is covered in our policy on Registration Appeals that is posted to our website at https://nscmirtp.ca/assets/documents/Registration-Appeals-Process.pdf Notification of the review process is also shared in the decision letter to an applicant when a decision other than full approval of registration is made. The internal review process of the NSCMIRTP does not allow for individuals involved in a registration decision to act as a decision maker in an internal review of the decision. If no, explain why not:	
REVIEW FINDINGS	Compliance Criteria (pursuant to Sections 7(a) and 10, 16(3)(m) and (n) of the FRPA): Requirement that the regulating body: <ul style="list-style-type: none"> • has a documented internal review process; • describes time frames associated with the internal review process; 	Compliant? (YES/NO) YES YES

(To be completed by the FRPA Review Officer)	• describes opportunities the applicant has to provide new information and make submissions with respect to their internal review;	YES
	• describes how internal review decisions are communicated to applicants and what information is included with the decision;	YES
	• ensures that no one who acted as a decision-maker in respect of a registration decision can act as a decision-maker in an internal review; and	YES
	• provides information on the internal review process in a publicly accessible manner.	YES
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (https://nscmirtp.ca/) on June 22, 2023.		

QUESTION 10 (INTERNAL REVIEW TRAINING)

Have the decision-makers for the internal review received training on conducting on an internal review? If so, describe the training.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please describe: To date the NSCMIRTP has not had an appeal of a registration decision. We have had legal council come in and do training with the credentials committee which covered. <ul style="list-style-type: none"> • Governing legislation • Procedural Fairness • Human Rights and Charter Due to the infrequent nature of a registration appeal at this level and the changing membership of the Board of Directors and Credentials Committee, training on internal reviews is completed by independent legal counsel on an as-needed basis, prior to the internal review.								
	<table border="1"> <thead> <tr> <th>REVIEW FINDINGS (To be completed by the FRPA Review Officer)</th> <th>Compliance Criteria (pursuant to Sections 11 and 16(3)(p) of the FRPA): Requirement that the regulating body:</th> <th>Compliant? (YES/NO)</th> </tr> </thead> <tbody> <tr> <td></td> <td>• ensures that internal review decision-makers have received training on conducting an internal review; and</td> <td>YES</td> </tr> <tr> <td></td> <td>• describes the training.</td> <td>YES</td> </tr> </tbody> </table>	REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 11 and 16(3)(p) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)		• ensures that internal review decision-makers have received training on conducting an internal review; and	YES		• describes the training.
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 11 and 16(3)(p) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)							
	• ensures that internal review decision-makers have received training on conducting an internal review; and	YES							
	• describes the training.	YES							
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on NSCMIRTP’s website (https://nscmirtp.ca/) on June 22, 2023.									

4. ACKNOWLEDGEMENTS:

The *Nova Scotia College of Medical Imaging and Radiation Therapy Professionals (NSCMIRTP)* hereby declares that the information contained in this report is a true and accurate representation of its current registration practices.

SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

8/1/2023

X Julie Avery

Signed by: 9eaf7685-d161-41dd-988d-586fda9a4e4b

Name (print): Julie Avery

DATE: 2023-08-01