

Canadian Dental Regulatory Authorities Federation

CDRAF
Canadian Dental
Regulatory Authorities
Federation



FCORD
Fédération canadienne
des organismes de
réglementation dentaire



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INTRODUCTION

With the dynamic changes occurring in global migration and trade agreements between nations, it is time to introduce ourselves. The Canadian Dental Regulatory Authorities Federation (CDRAF) is an alliance of the provincial dental regulatory authorities (DRAs). These regulators are the only bodies with the exclusive, legislated mandate of public protection.

The voluntary cooperation of the regulated professions is critical to the successful implementation of pending trade agreements such as CETA and TPP.

Before and after negotiating such agreements, CDRAF has much to contribute to these discussions by ensuring government is well-informed on current issues within the profession and in maintaining an open dialogue with the dental regulatory bodies across the country.

Dental regulatory authorities speak with one, reasoned and fair national voice when addressing registration requirements regardless of where an individual received their education and training. This was accomplished voluntarily and without legislated mandates.

DRAs recognize that a stable and growing economy is of vital importance. It is also imperative that this quest does not divert our focus from our primary legislated mandate of public protection. It is here that dental regulators have a critical and exclusive role to play.

CHAPTER ONE

CDRAF: NATIONAL VOICE FOR DENTAL REGULATORS

The provincial dental regulatory authorities have collaborated on important issues for decades. One of our major achievements was a formal national Mutual Recognition Agreement signed in 2001.

However, increased globalization and government initiatives, such as the Agreement on Internal Trade (AIT), made it clear that more work was required. To ensure the primary mandate of public protection remained the core work, DRAs needed to establish a cohesive, uniform and national approach to a range of issues involving the access to the dental profession in Canada. Dental regulators needed to act with a national voice. So, on March 3, 2004, CDRAF was born. See Appendix A for CDRAF Core Functions.

In December 2008, a final amended version of the AIT was signed by the Premiers that legislated permit-to-permit recognition within Canada. Conditions included:

- no additional re-testing, retraining or re-assessment;
- if registered there, they get registered here;
- educational requirements, examinations and currency (evidence of practice) were eliminated where an applicant is already registered in another province or territory.

CDRAF moved quickly to address the federal government's concerns about mobility in Canada. By July 2009, a new national MRA was in place implementing the AIT conditions named above. The agreement was updated again in 2014. See Appendix B for dentistry's MRA.

CHAPTER TWO

ROLE OF PROVINCIAL REGULATORS

Provincial governments created the health regulatory system to ensure that only suitable, competent individuals were licensed according to legislated requirements.

The DRAs are responsible for approximately 22,000 dentists throughout Canada. The provincial breakdown, as of June 2016, is:

B.C.	3,133
Alberta	2,455
Saskatchewan	455
Manitoba	671
Ontario	9,465
Quebec	4,625
New Brunswick	331
PEI	84
Nova Scotia	539
Newfoundland & Labrador	213

With provincial government approval, the DRAs have a number of specific responsibilities:

- set entry-to-practice requirements;
- set standards of practice for the dental profession;
- administer quality assurance programs that members are required to participate in to help maintain their competence;
- set ethical standards;

- investigate complaints;
- take appropriate disciplinary action as necessary;
- protect the public's right to quality oral health and dental services;
- guide the profession by establishing standards, practice guidelines and ongoing quality assurance/peer reviewed requirements after registration;
- advise government on important issues, such as infection control protocols, policies on blood borne pathogens, and the very current topic of narcotics and pain control.

Provincial regulatory bodies are creatures of provincial statute. They do not have the right to operate outside that legislation. Provincial governments maintain very strict oversight.

There is a lengthy vetting process to amend or create any health regulation. This process includes an intense analysis of the proposed legislation and a public consultation component.

Submissions to government from a regulator must include information such as:

- rationale for the regulation or amendment;
- relationship to the DRA's policy objectives;
- explanation of what the problem is and with supporting evidence;
- description of how it supports the various health acts involved, including how it assists in public protection and the risks if the regulation/amendment is not passed;
- financial implications;
- impact on the profession, other regulated professions, government ministries and other jurisdictions;
- compliance with provincial Fair Access to Regulated Professions Acts, where they exist.

These extensive safeguards contribute to a licensure process that is fair, objective and transparent.

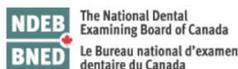
CHAPTER THREE

WORKING IN NATIONAL PARTNERSHIP

CDRAF and its partners have agreed to several general principles that act as the foundation for the registration process of dentists across the country. They are:

- The mandate of all provincial dental regulatory authorities is public protection.
- A transparent, impartial, objective and fair assessment of an applicant's competencies and qualifications will be available, regardless of where an applicant was trained.
- Every Certificate of Registration issued by a DRA is a warrant that the holder was held to a common standard, protocols and validated qualifying conditions allowing for interprovincial portability of credentials and labour mobility.
- Only those applicants who are able to establish that they have the knowledge, skill and competencies required of a general dentist in Canada, including but not limited to the successful completion of the national examination administered by National Dental Examining Board of Canada, will be accepted for registration. In meetings and consultations with the international community, our goal is to harmonize protocols and training curriculums on the international stage to aid credential recognition.

There are a number of other institutions that have united to create a reasoned, unified and appropriate system of registration that protects the public. The following chart illustrates these interconnected relationships.



CANADIAN DENTAL REGULATORY AUTHORITIES FEDERATION

CDRAF is the national forum and collective voice of provincial and territorial dental regulatory authorities on regulatory matters. The Federation is the only organization that speaks for the over 22,000 dentists in Canada on professional regulatory issues related to the practice of dentistry.

DENTAL REGULATORY AUTHORITIES

Through provincial government legislation, protects the public as the governing bodies for dentists by setting entry-to-practice requirements, standards of practice, administering quality assurance programs respecting competence, ethical standards, investigating complaints, taking disciplinary action as necessary, and protecting the public's right to quality oral health care.

NATIONAL DENTAL EXAMINING BOARD OF CANADA

By 1952 Act of Parliament: Establishes qualifying conditions for a national standard of dental competence for general dentists and maintains an examination facility to test that the standard has been met. Created list of "Competencies for a Beginning Dental Practitioner in Canada."

COMMISSION ON DENTAL ACCREDITATION OF CANADA

The body responsible for accrediting dental, dental specialty, dental residency, dental hygiene and dental assisting education programs in Canada.

UNIVERSITIES / ASSOCIATION OF CANADIAN FACULTIES OF DENTISTRY

Develops undergraduate dental programs/ curriculums/ standards/ healthcare enculturation leading to a dental degree.

COMMISSION ON DENTAL ACCREDITATION OF CANADA

The Commission on Dental Accreditation of Canada (CDAC) acts as a partner with the DRAs, educational institutions and health facilities to protect and further the public interest through the accreditation process.

Accreditation is a peer review process that measures education programs utilizing predetermined criteria, including competencies for the beginning dental practitioner in Canada.

The registration of dentists in Canada, and through reciprocal agreements with the United States, Australia, New Zealand and Ireland, is founded through a mutually recognized system of accreditation of dental training.

Dental educational programs are invited to apply for review against current CDAC requirements. The universities applying for accreditation must complete comprehensive questionnaires and submit extensive documentation outlining their compliance with necessary requirements. An onsite visit is then arranged. A survey team examines the physical facility and does comprehensive information gathering, including interviews with both faculty and students.

For international programs, typically a governing authority, such as a dental council, will act as the intermediary. Mutual Recognition Agreements are established with countries where processes in areas, such as accreditation/quality assurance, standards and curriculum content, are believed to be substantially equivalent to those in Canada. A relationship is established between CDAC and the country and then the application process, as described, begins.

Accreditation teams visit and review dental programs on regular cycles throughout Canada. The identical function is performed in other countries seeking accreditation status or renewing an established relationship with Canada. To date, these countries are the United States, Australia, New Zealand and Ireland.

A survey team is comprised of educators in the specific discipline, a representative of the regulatory authority and a representative of the certification organization. The survey teams are accompanied by representatives from both CDAC and the local authority. This provides assurance that the same outcome measurements are used and accreditation standards are met throughout Canada and our MRA partners.

This in-depth process clarifies issues arising from the written submission and verifies that the documentation reflects the program or service. The survey team

submits their report to CDAC for review. Then CDAC determines the eligibility of the program or service for accreditation.

NATIONAL DENTAL EXAMINING BOARD OF CANADA

The National Dental Examining Board of Canada (NDEB) was vested by an Act of Parliament in 1952. It is responsible for the establishment of qualifying conditions for a national standard of dental competence for general practitioners and for maintaining an examination facility to test that this standard has been met. The NDEB is a non-profit organization that operates on a cost-recovery basis.

Historically dentistry has taken a proactive approach in striving to balance public protection while using the most fair, efficient and effective methods of assessment and examination.

Dentistry had developed a national consensus about most registration requirements well ahead of most other Canadian regulated professions. In fact, dentistry in Canada took action on this front before the European Union was formed and indeed prior to the national mandate for labour mobility here. Even today, the United States operates with a very fragmented system.

Through on-going in-depth investigation and analysis, NDEB created the nationally accepted record of “Competencies for a Beginning Dental Practitioner in Canada.”

These competencies are used to establish university curricula, examination blueprints and accreditation standards for Canada and, through the MRA process described earlier, the United States, New Zealand, Australia and Ireland.

It is a point of pride that these same competencies have been used both nationally and internationally to establish processes in other professions as well. NDEB conducts a psychometric analysis after each examination to confirm that its standards are current, accurate and reliable.

NDEB operates with a high degree of transparency and accountability. NDEB regularly reports to CDRAF on its progress as an international expert and consultant in the field of examinations and competencies, and on the results of its examinations and psychometric evaluations. NDEB also publishes a Technical Manual which provides detailed validity and reliability analyses for the NDEB examinations.

CHAPTER FOUR

PAN-CANADIAN FRAMEWORK FOR THE ASSESSMENT & RECOGNITION OF FOREIGN QUALIFICATIONS

The various partners of the DRAs play crucial roles in a seamless, logical, transparent and validated system that protects the public and benefits candidates while fulfilling regulatory responsibilities and the goals of Government.

An excellent example of how dentistry's licensure requirements align with the goals of government is reflected in the *Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications* (Framework) established on November 30, 2009, by the Canadian First Ministers. The Framework states:

Governments must take concerted action on the assessment and recognition of foreign qualifications in order to create an environment where immigrants are able to apply their talents.

Foreign qualification recognition is the process of verifying that the knowledge, skills, work experience and education obtained in another country is comparable to the standards established for Canadian professionals and tradespersons.¹

There is a Foreign Qualifications Recognition Working Group (FQRWG) at the federal and provincial levels charged with implementing the Framework. As one of the target occupations, dentistry has cooperated fully in attending FQRWG meetings and completing their surveys.

¹ Government of Canada website – Introduction, Foreign Qualification Recognition

As described by FQRWG: Under the Framework, a number of ministries such as Citizenship and Immigration, Human Resources and Social Development, Global Affairs (Trade) and Health Canada, have been supporting the creation of more efficient and effective foreign qualification assessment and recognition systems....²

Dentistry is a recognized leader in this arena. The Framework's goals for regulatory bodies fall into four categories: fairness, transparency, timeliness and consistency.³ Not surprisingly, these principles also mirror those of provincial Fairness Commissioners.

Dentistry more than meets these requirements. The following analyses of the Framework's stated principles at both the federal and provincial levels are a clear demonstration of that.

PRINCIPLE: FAIRNESS

- The criteria used for determining recognition of qualifications are objective, reasonable, do not exhibit bias and are cost effective.
- The methods used for assessing qualifications are both necessary and sufficient for determining whether occupational standards are met.
- Canadians and internationally-trained applicants will be treated equally with regards to the requirements that must be demonstrated in order to achieve qualification recognition.
- Communication of assessment results involves clear explanation of the rationale for the decision that has been taken, including the identification of additional requirements for licensure and registration, as well as avenues for internal review and appeals.
- Assessment processes are efficient and avoid duplication, particularly where there are multiple assessments required by different parties during the assessment process of an individual applicant.
- Information regarding assessment approaches and tools is available online, and opportunities exist for practitioners and other affected stakeholders to share best practices regarding assessments.

² Forum of Labour Market Ministers – Progress Report November 2009 to December 2010, page 1

³ Government of Canada website – The Pan-Canadian Framework, II Principles,

http://www.esdc.gc.ca/en/foreign_credential_recognition/funding/framework.page#h2.3-h3.2

Fairness: How Dentistry Measures Up

Dentistry's approach respecting fairness is well-recognized and praised by various ministries and levels of government. At the provincial level a number of governments have established fairness legislation that mandates regulatory bodies to have fair registration practices. Fairness Commissioners scrutinize the work of regulators very closely and require on-going reports, audits and evidence that regulators are being fair. There is therefore a convergence of oversight in this requirement between the Framework, the Federal and Provincial Framework working groups and Fairness Commissioners, where they exist.

An example of fairness legislation oversight can be found where it was first established, in Ontario, with the first audit performed in the country in 2009. This audit, while necessarily conducted at the provincial level, was an extremely comprehensive investigation that analyzed dentistry's protocols and assessments respecting registration requirements.

The audit encompassed dentistry's registration protocols against fairness legislation and looked at international standards as outlined in ISO 17024, General requirements for bodies operating certification schemes for persons.

Deloitte, the auditor approved by the Ontario Fairness Commissioner, concluded that "the registration policies and procedures appear to be fair, transparent and reasonable". This is important because, while the audit was conducted at a provincial level, the registration requirements reviewed are national requirements consistently applied across the country.

Provinces with Fairness Commissioners continue to have on-going reporting duties and submit annual reports that are a sweeping, detailed review of the regulator's procedures.

Dentistry's national registration practices also stand up to international scrutiny.

In 2013, Ontario invited the Professional Standards Authority (PSA) of the United Kingdom to come in to conduct an objective third-party audit of its work as a health care regulator. PSA is an independent body, accountable to the United Kingdom (UK) Parliament that oversees the work of nine statutory bodies that regulate health professionals in the UK.⁴

⁴ PSA monitors policy developments in the UK and internationally and provide advice to governments and others on matters relating to people working in health and care. Please visit: www.professionalstandards.org.uk

On review of the Canadian process, PSA concluded that the registration process was “fair, efficient, transparent, secure and continuously improving.” This independent audit by an organization bestowed with investigative authority by the UK government validated the Canadian dental registration processes. See Appendix D for a detailed guide of the standards the PSA reviews against, entitled: The Performance Review Standards, Standards of Good Regulation.

NDEB and Fairness

Domestically trained and internationally-trained are treated equally – everyone must meet the same standards and pass the established record of competencies. With NDEB working nationally across the country with all provincial regulators, there is no duplication of assessments, plus there is an established appeals process in place.

As an examining body, NDEB goes to great lengths to ensure that the universal characteristics of a good, psychometrically reviewed test - validity, reliability, objectivity and practicability – are met.⁵

NDEB is currently in one of its regular review cycles. It contracted with external testing and training experts to conduct a survey and perform a practice analysis for general dentistry in Canada. The practice analysis was carried out over 18 months, culminating in a draft report in June of 2015.

As NDEB has described: “The results of this practice analysis will be primarily used for the NDEB’s certification examinations to inform changes required to the examination blueprints. It is anticipated that the results will also be of use to the Association of Canadian Faculties of Dentistry for curriculum planning of dental programs, and to the Commission on Dental Accreditation of Canada for accreditation purposes.”⁶

In January 2015, NDEB launched the development of a renewed three-year plan. The new plan identifies priorities in key areas including by-laws and policies, finance, human resources, legal matters, examinations and assessments, research, accreditation standards, processes and reciprocal agreements, credential verification, and stakeholder communications. It calls for:

- enhanced transparency;
- improved communications with applicants, participants and candidates;

⁵ National Council on Measurement in Education

⁶ NDEB – Report on the 2015 Practice Analysis of Dentists in Canada, page 6

- increased security for and improved efficiency of all examination and assessment processes;
- strengthened relationships with the dental regulatory authorities, the Association of Canadian Faculties of Dentistry and the Commission on Dental Accreditation of Canada;
- increased dialogue with provincial and federal governments;
- heightened visibility of the NDEB internationally.⁷

NDEB processes are never static. NDEB follows all good practices: goal and standard setting, analyzed test results, psychometric validity testing, and periodic revalidation of competency statements. These concerted efforts and constant responsiveness to the evolution of the profession and the associated science ensures that practitioners have the knowledge, skill and judgment to practise safely and competently.

In addition, these best practices in testing produce reliable results and are concomitantly balanced, fair, objective and non-discriminating in their treatment of the candidates. Recognizing the quality of its processes, New Zealand replaced its system of assessing the internationally trained with the NDEB Equivalency Process (an assessment based protocol – see Chapter 5) in 2015.

PRINCIPLE: TRANSPARENCY

- Requirements for applying to a specific occupation, as well as the methods for assessment and criteria for recognition of foreign qualifications, are fully described, easy to understand, and widely accessible to immigrants.

Transparency: How We Measure Up

All our provincial and national partners definitely address this principle. NDEB, the DRAs, CDAC, the universities and CDRAF keep this value paramount.

CDRAF website is detailed and provides a broad scope of information including an overview, nationally accepted registration requirements, the NDEB Equivalency Process, a common description of the provincial application process, fees and costs associated with the various processes and an explanation of labour mobility in Canada. See Appendix C for electronic links to this information.

CDRAF's website has an explanatory overview entitled "How is Training Completed Outside of Canada Assessed?" In an honest, clear and transparent

⁷ NDEB – 2015 Annual Report, page 3

manner, it explains the national requirements and the NDEB's methods and reasons for the existing protocols, similar to what is found in this submission. It provides insight on immigration issues, appeals, the science behind assessments and validation and generally addresses the main contentious questions submitted to DRAs.

NDEB's website is easy to understand and openly describes the competencies that candidates are measured against. Thousands of still active questions from the NDEB databank are available on its website. Each step in the two NDEB pathways to certification is well-defined and the areas of assessment explained. Reference materials and resources are also outlined.

PRINCIPLE: TIMELINESS

- The assessment and recognition of foreign qualifications, as well as the communication of assessment decisions, are carried out promptly and efficiently.

Timeliness: How We Measure Up

Dentistry more than meets the FQR Framework benchmark that "within one year, an individual will know whether their qualifications will be recognized, or be informed of the additional requirements necessary for registration, or be directed toward related occupations commensurate with their skills and experience."⁸

As dentistry does not perform credential evaluations and all are welcome to take the necessary assessments, candidates know instantly on review of any DRA website, the national CDRAF website or the NDEB website whether their qualifications will be recognized and what requirements are necessary for registration.

Once an application is submitted, NDEB's turnaround time for verifying credentials is approximately one month. All stages of the NDEB Equivalency Process can be completed within nine months if the candidate's training is sufficient.

PRINCIPLE: CONSISTENCY

- The methods for assessment and criteria used for determining recognition of qualifications for specific regulated occupations are mutually acceptable in each province and territory of Canada so that the results of the assessment processes are mutually recognized.

⁸ Government of Canada website – The Pan-Canadian Framework, IV
http://www.esdc.gc.ca/en/foreign_credential_recognition/funding/framework.page#h2.3-h3.2

Consistency: How We Measure Up

Dentistry excels in this arena. The registration requirements are the same across the country. There is a mutually recognized system of accreditation and qualification streams and, for nearly 65 years, nationally recognized competencies and examinations.

PRINCIPLE: PREPARATION AND PRE-ARRIVAL SUPPORTS

- Immigrants are able to make contact with key stakeholders, including the appropriate regulatory authority, prior to their arrival in Canada.
- As early as possible in the immigration process, immigrants will have access to reliable and accurate information and assessment services.
- Improved availability and quality of assessment preparation and other early intervention support tools, including occupation specific self-assessment tools and reference and exam preparation materials.

Preparation & Pre-Arrival Supports: How We Measure Up

NDEB, DRAs and CDRAF have sophisticated websites with extensive and reliable information. Numerous links are provided to the necessary resources and our contact information, phone numbers and email addresses are posted.

The NDEB has a self-assessment tool on its website plus considerable information about the examinations, a Technical Manual, information on question selection and test equating, reference texts, and thousands of active examination questions.

The Equivalency Process assessments are offered at 10 locations within Canada and have also been given in London, England, Hong Kong and New Zealand. NDEB will consider offering all three assessments, including the practical clinical skills, outside of Canada if there are a minimum of 50 applicants and sites have acceptable security.

Access to the process was enhanced in 2015 when NDEB started offering the Assessment of Fundamental Knowledge and the Assessment of Clinical Skills (part of the Equivalency Process) twice a year instead of once in response to increased demand by applicants.

CHAPTER FIVE

INTEGRATING THE INTERNATIONALLY TRAINED

Worldwide economic drivers are shifting the focus of the Canadian government beyond interprovincial labour mobility to global labour mobility. These initiatives are seen as critical to assuring our place in the competitive world marketplace. However, it must not be forgotten that the criteria used to determine the movement of health professionals must be vastly different from the criteria for commodities. Public safety considerations must be paramount.

The profession of dentistry has not been complacent in dealing with this new global reality.

There are a number of pathways to registration/licensure in Canada for the internationally trained. There are the MRAs with countries that have proven to have substantially equivalent standards, training, competency evaluation and oversight mechanisms. These candidates are treated identically to graduates of Canadian dental programs.

There are bridging programs, known as degree completion programs, offered by faculties of dentistry in Canada, the United States and countries where mutual recognition agreements exist. Generally, these bridging programs grant advanced standing to qualified internationally trained candidates who are then admitted into the final two years of our accredited four-year dental programs. Candidates are awarded a dental degree upon successful completion. This straightforward approach bridges many gaps between international programs and Canadian training and standards.

A third pathway exists for candidates with competency that falls in-between the above stated pathways. They did not complete an accredited dental program but may not require a two-year, advanced standing program. This is an assessment based protocol known as the NDEB Equivalency Process.

Qualified candidates from all three pathways, regardless of whether their training was domestic or international, complete the NDEB national certification examinations. A more detailed explanation of our partner's roles and processes is provided in Chapter 6.

WHAT DETERMINES THE PATHWAY?

Monitoring of assessment results, admission tests, performance in Canadian bridging programs and results of the national examinations collectively provide insight into the level of training of the internationally trained, in addition to assessing their individual competencies.

The National Dental Examining Board, the Commission on Canadian Dental Accreditation and various DRAs have frequent contact with international dental regulatory authorities, attend international conferences and workshops on education and registration, make invited presentations, and provide consultation to international examining bodies and regulatory boards. These various opportunities are also used to confirm the nature of many international dental programs and whether accreditation processes or valid oversight exists.

With CETA in play it is appropriate to turn for a moment to the European Union. There is a wide spread misconception, often promulgated by universities particularly in the European Union, that a degree is a degree is a degree. We respectfully disagree.

In Europe, the 1999 Bologna Agreement is the foundation for mobility of professionals. Its goal is universal recognition of European higher education. The original Bologna Agreement went to great lengths to avoid any language that suggested university programs should be standardized, harmonized, unified or have stated goals and outcomes. It only spoke about a convergence of recognition.

This approach was subsequently re-emphasized with the introduction of "Tuning Educational Structures in Europe" which over time has become a formal approach. The name Tuning was chosen to reflect the belief that:

Universities should not look for uniformity in their degree programmes or any sort of unified, prescriptive or definitive European curricula but simply look for points of reference, convergence and common understanding.⁹

The European Commission's website recognizes that: "Widely differing education and training systems in Europe have traditionally made it hard for Europeans to use qualifications from one country to apply for a job or a course in another."¹⁰ Since 1999, there has been some progress to establish minimal benchmarks and overall organization. However, there remains considerable opposition from the universities. Dr. Chris Lorenz, Professor of Philosophy at the University of Amsterdam has noted:

... not everyone in European universities is as optimistic about the Bologna Process arguing that faculty are concerned about academic freedom, and in particular about the traditional role of the academic profession as a body that sets its own standards and conducts its own evaluations.¹¹

The inherent conflict of interest in this approach is obvious. The lack of an independent, external review that measures against universally accepted competencies means that the level, breadth, scope and standards of training will remain inconsistent throughout Europe.

One project the European Commission instituted in order to apply some structure to university programs involved modifying how university credits are obtained and a shift to the European Credit Transfer System (ECTS). This too, however, is not without its critics:

Recognition of the so-called "Bologna degrees" presents an important challenge for European institutions.... Universities and countries are at different stages of development of measures to ensure the recognition of the new degrees beyond member states.... the ECTS has brought a surface transparency to degrees, but this masks the actual contents of courses.¹²

The confusion and controversy of the Bologna Process has built walls instead of bridges, even within Europe.¹³

⁹ Tuning website main page - <http://www.unideusto.org/tuningeu/>

¹⁰ European Commission website, Bologna Agreement main page, http://ec.europa.eu/education/policy/higher-education/bologna-process_en.htm

¹¹ The Bologna Process and Implications for Canada's Universities – Report of the 2009 AUCC Symposium, page 5

¹² The Bologna Process and Implications for Canada's Universities – Report of the 2009 AUCC Symposium, page 5

¹³ The Bologna Process; Bridge or Fortress? Conrad King from the Institute of European Studies, University of British Columbia

Looking at the current approach to training in the EU, in the interest of public safety and protection in Canada, much more work is needed before there is blanket recognition agreements put in place.

The situation worsens when one moves beyond the European Union. The differences in training and lack of standardized curriculums, the lack of oversight and independent reviews of outcomes, combined with variances of post-degree practice standards, require vigilance in the Canadian licensing process to ensure public protection.

Recognizing that the point of registration or licensure is the major safeguard in public protection, the approach to registration must be based in the precautionary principle of risk management.

The reality is that, when looked at through the Canadian lens respecting standards, scope of training, health care enculturation and more, there will be a percentage of candidates seeking licensure whose training was inadequate for registration in Canada.

While it may be possible to enter into an MRA with certain countries or possibly individual universities, it is not feasible at this time to have MRAs with the entire European Union or all the parties to the Trans-Pacific Partnership. Currently, dentistry does have MRAs with several TPP countries, the United States, Australia and New Zealand, where proper investigation and validation of dental training systems was conducted.

CHAPTER SIX

PATHWAYS TO LICENSURE CLOSE-UP

This chapter will review in greater detail the four pathways to licensure that are available to internationally trained applicants across the country. They demonstrate the work, dedication, efficacy, fairness and objectivity invested by dentistry to create a success story for candidates entering the profession in Canada.

It is important to note that dentistry does not support the concept of credential assessments. On behalf of the provincial DRAs, NDEB conducts credential verification to discover fraudulent applicants. While detection of fraudulent documentation is done successfully, it is impossible to distinguish differences between dental programs based solely on a paper review.

No organization has the ability to determine equivalency in a health profession, such as dentistry, based only on a review of transcripts, program descriptions and similar material.

Transcripts from all over the world look the same. Paper reviews are often unable to determine minimum admission requirements, the number of full-time faculty with dental degrees, the faculty's qualifications or the number of hours students treat patients (if any) in a university-based clinic.

In many countries, there is a proliferation of private dental programs without any university affiliation or oversight at all. There is also great inconsistency respecting the measurement of program outcomes or whether graduates have actually obtained the necessary competencies.

The difference in educational levels between countries is significant. For example, a high school diploma in some countries may be the equivalent of a Canadian grade nine or ten standing. High school graduates entering directly into Ph.D. programs without a bachelor degree or completion of any formal dental program have been observed.

Above and beyond any paper review is the fact that each practitioner's clinical competency depends on numerous factors. Here in Canada, even with an accredited degree, it is necessary to complete a national examination as the final safeguard. A clinical evaluation of competency is absolutely necessary.

A paper review provides no relationship to equivalency relative to standards or individual competency. It only produces a conclusion based on a comparison of the years of study.

PATHWAY ONE: ACCREDITATION

The evaluative process of accreditation was explained in Chapter Three. For dental programs outside of Canada, the first step is to verify whether the program is approved in that jurisdiction by a valid and defensible oversight process that is determined to be substantially equivalent to the CDAC accreditation process. If deemed equivalent, a Mutual Recognition Agreement (MRA) is made between CDAC and its equivalent in the other jurisdiction. The NDEB and the DRAs then recognize the training. With training deemed to be equivalent, candidates from recognized programs are then eligible to take the NDEB national examinations.

At the request of CDRAF, over the past several years CDAC and NDEB have proactively contacted many international dental regulatory authorities to inquire if an accreditation process similar to the CDAC process exists in their jurisdiction.

As a result of these contacts, in 2010 an MRA was implemented with the Australian Dental Council. MRAs were signed with New Zealand in 2011 and Ireland in 2012. Negotiations with Hong Kong and the United Kingdom are ongoing. Assistance with the development and implementation of an accreditation process continues to be provided to the Republic of Korea.

Quebec-France Accord

A creative variation of an MRA, one made possible by the privileged relationship between Quebec and France, is the Québec-France Agreement on the Mutual Recognition of Professional Qualifications. Signed on October 17, 2008,

the agreement recognizes certain dental diplomas from identified French universities and adopts a common procedure for recognizing professional competence through a mentoring/monitoring form of internship to determine overall equivalence.

PATHWAY TWO: ACCREDITATION REVIEW BY THE UNITED STATES

A similar process to the Canadian accreditation review is one originating out of the United States through its accreditation body, the Commission on Dental Accreditation (CODA). CODA has established its own accreditation procedure for international dental programs that can be initiated at the request of the respective international dental program. With the Canadian/American reciprocal agreement in place, NDEB and therefore the DRAs recognize graduates of international programs approved by CODA.

PATHWAY THREE: BRIDGING PROGRAMS

The candidate completes a bridging/degree completion program. These are two-year classroom-based programs where candidates enter the final two years of an accredited four year dental program. There are currently over 70 universities throughout Canada and the United States to which candidates can apply. If a candidate obtained a degree through a similar process in Australia, New Zealand or Ireland, then it too is recognized.

PATHWAY FOUR: NDEB EQUIVALENCY PROCESS

Accreditation reviews and bridging programs were created to assist in addressing the differences and inconsistencies in training and practice environments around the world.

To achieve fairness, in 2009 CDRAF re-opened the MRA and finalized a project with the NDEB to create a streamlined assessment protocol for the internationally trained. Known as the Equivalency Process, it provides an alternative to the two-year bridging programs for graduates of non-accredited dental programs. For efficiency it was also integrated with the admission process for the bridging programs.

In 2010, NDEB began processing applications for the Equivalency Process. In a totally egalitarian approach, all graduates of non-accredited dental programs are eligible to participate in the NDEB Equivalency Process if their degree was issued by a valid university.

The process is much shorter in length and far less expensive than the two-year degree completion programs. Candidates do not have to attend full-time classes, but only attend periodic scheduled assessments. Some applicants continue to practise dentistry in their home country and only come to Canada for the assessment sittings.

NDEB is a world renowned model for evaluating dental competence. It has informed CDRAF that representatives from around the world have come to observe and study their processes, setting the standard for testing graduates of non-accredited dental programs.

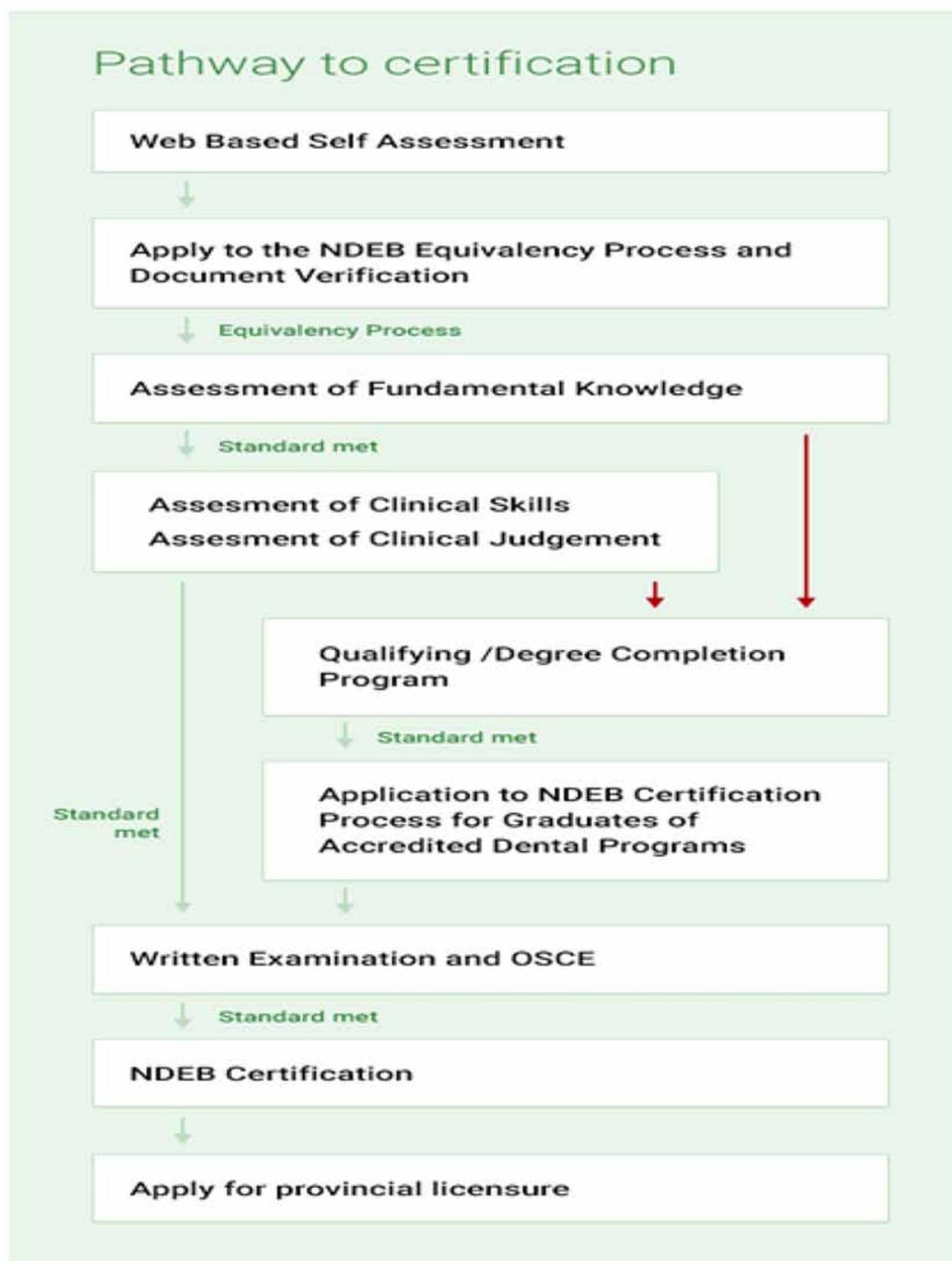
As referenced earlier, the efficacy of the Equivalency Process was further supported when New Zealand decided to replace its own examinations for the internationally trained with the NDEB's Equivalency Process. Their first assessment using the Canadian assessments was held in August 2015 at the University of Otago in Dunedin, New Zealand.

The key elements of the Equivalency Process are:

- a voluntary web-based self-assessment tool accessible world-wide;
- submission of an application and supporting documentation followed by the credential verification conducted by NDEB to eliminate fraud;
- a one day theoretical exam called Assessment of Fundamental Knowledge to verify basic training;
- a two-day evaluation of psychomotor skills and judgements called Assessment of Clinical Skills during which participants perform simulated dental procedures on a mannequin;
- a one-day high level case-based examination called Assessment of Clinical Judgement.

Successful completion of these assessments allows candidates to take the same NDEB examinations, called the Written and Objective Structured Clinical Examinations (OSCE), taken by graduates of accredited programs here in Canada. Individuals who are not successful are still eligible to apply for admission to the degree completion programs.

The diagram below illustrates the two different but integrated pathways to certification and ultimately licensure.



All the pathways for non-Canadian trained dentists, MRA's, degree completion programs and the Equivalency Process have proven to be extremely successful.

In its June 2015 report, Employment and Social Development Canada recognized our efforts stating that:

Architects and dentists have created expedited processes that significantly reduce the cost and the time it takes for foreign trained candidates to get licensed.¹⁴

That is not to claim that every candidate will successfully obtain recognition in Canada. Because of different scopes and quality of training, lack of practice standards, lack of continuing education programs, diverse healthcare cultures and ethical approaches to care, there will be candidates who will ultimately be unsuccessful. However, when comparing the domestic number of NDEB certified dentists and those who were internationally trained, the numbers are impressive. In 2015, well over half came through the pathways described in this document and were not domestically trained.

Of the 1,022 dentists certified by the NDEB in 2015, 435 were domestically trained and 587 came from the other pathways. Specifically, 248 from programs recognized through MRAs, 90 from the bridging/degree completion programs and 249 from the Equivalency Process. In addition, there were 15 candidates licensed through the Quebec/France Accord.

¹⁴ Employment and Social Development, Strategic Policy and Research Branch, Final Report June 26, 2015 - *Joint Summative Evaluation of Foreign Credential Recognition Program/Inter-provincial Labour Mobility Initiative*

MOVING FORWARD

INTERNATIONAL SOCIETY OF DENTAL REGULATORS

A conference was held by the International Society for Quality in Health Care (ISQua) in October 2013 in Edinburgh. Health care providers from sixty countries and over 1300 delegates attended. The gathering presented an opportunity for dental regulators to meet and simultaneously hold the first international conference focused on dental regulation. This first conference dealt with shared issues such as labour mobility, international accreditation, development of guidelines and standards, plus the role of continuing education in ensuring continued competency.

Those attending immediately recognized the need to continue the dialogue and the merit in formalizing and expanding the relationships among dental regulatory authorities to the international level. Thus the International Society for Dental Regulators (ISDR) was born. ISDR members include Canada, Australia, New Zealand, United Kingdom, Ireland, Dubai, France, Singapore, South Korea and Jamaica, plus the NDEB and CDAC from Canada.

VISION & OBJECTIVES

ISDR operates exclusively to support dental regulatory authorities worldwide in the achievement of their mandate of protecting, promoting, and maintaining the health and safety of the public by ensuring proper standards for the dental professions.

The ISDR achieves this purpose through the pursuit of the following objectives:

- To support dental regulatory authorities worldwide in protecting the public interest by promoting high standards for dental education, licensure, registration, regulation, and professional conduct and facilitating the ongoing exchange of information among dental regulatory authorities.
- To facilitate international cooperation and collaboration among dental regulatory authorities, including establishing a network for the regular exchange of dental licensing, registration, regulatory, and disciplinary information.
- To encourage research, policy analysis, and policy development related to dental licensure and provide a forum for the development and sharing of new concepts and new approaches in the regulation of dental practice.

GLOBAL DENTAL ACCREDITATION STANDARDS AND DENTAL COMPETENCIES

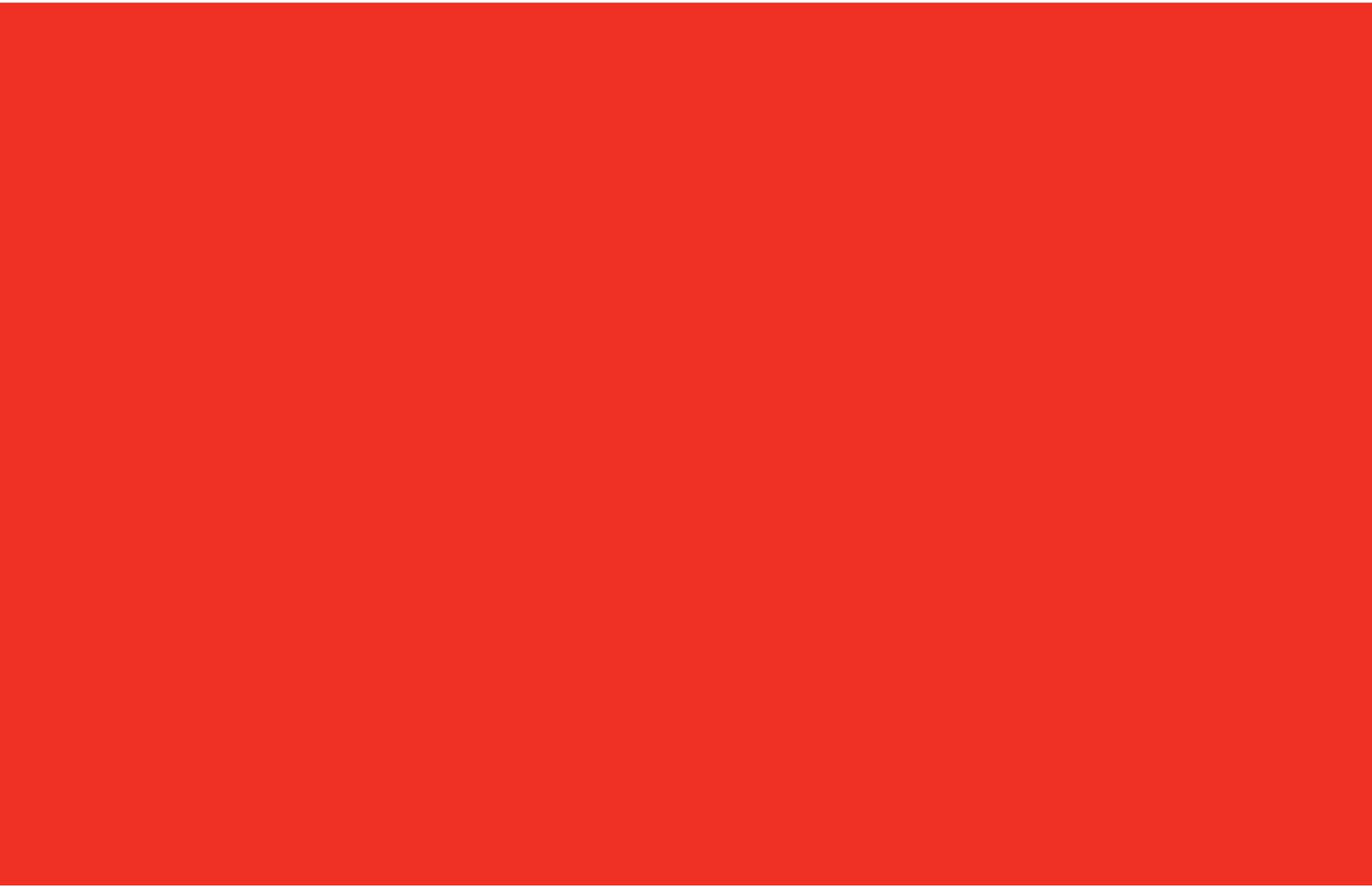
At the moment, the approach to setting international standards is principle-based, due to the inability to apply prescriptive standards or an accreditation process internationally because of varied legislative, regulatory and educational frameworks in each jurisdiction. It is also a reality that many jurisdictions choose not to seek out what some consider to be foreign interference, perceived criticism or investigation of their programs. And of course these matters are not without cost.

Having said that, there is a first step in every journey and the members of ISDR are committed to pursuing this important endeavour. ISDR is now consulting with international stakeholders on proposed accreditation standards for dentistry programs and the competencies for dentists. Upon achieving consensus, it is hoped that these core standards will be available and of interest to other countries/jurisdictions.

IN CONCLUSION

This report has outlined the many initiatives, pathways, principles and approaches to the registration/licensure of dentists in Canada. CDRAF is committed to continue the pursuit of best practices and opportunities with any willing partner. Each situation and jurisdiction will present its own unique hurdles. These hurdles are always approached with collaborative dialogue. There is no one right answer.

CDRAF welcomes any opportunity for discussion and collaboration. Please contact Diane Legault, CDRAF Executive Director, at 438 502 3723, info@cdraf.org www.cdraf.org



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Canadian Dental
Regulatory Authorities
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