

Internationally Educated Nurses (IEN) Registration Process Review

College & Association of Registered
Nurses of Alberta

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Executive Summary

The College & Association of Registered Nurses of Alberta is committed to ensuring ongoing development and enhancement in its regulation of the registered nurses profession.

CARNA retained Field Law to conduct a third party review of its registration process for internationally educated nurses to ensure that it is compliant with the applicable legislation, fair (including objective, impartial, transparent and timely) and accessible. In the spirit of continuous process improvement, this review is intended to generate recommendations to improve and strengthen CARNA's IEN registration process.

The methodology that we followed in conducting this review was intended to give us a comprehensive view of the IEN registration process and also to help us understand different perspectives of those involved in the process, from applicants to administrators to decision makers. The methodology is set out at pages 6 to 7.

The assessment criteria that we developed to evaluate the IEN registration process are set out at pages 8 to 10 and include:

- 1) Is the IEN registration process consistent with the *Act* and the *Regulation*?
- 2) Is the IEN registration process fair, meaning is it objective, impartial, transparent and timely?
- 3) Is the IEN registration process accessible?
- 4) Does the IEN registration process ensure that only those applicants who meet the requirements become registered nurses? Does it provide sufficient protection for the public?
- 5) Is the IEN registration process consistent with the principles established in applicable trade agreements?
- 6) Is there a mechanism in place for CARNA to assess its criteria and the IEN registration process on a continuous basis?

In measuring the IEN registration process against these criteria, we arrived at the following fundamental findings:

- CARNA is a high-performing regulator that is committed to right touch regulation and continuous improvement. We have also observed that CARNA has a talented and dedicated group of staff who are committed to CARNA and its mandate of public protection.
- Due to the very nature of it, the IEN registration process involves a significant number of steps and is relatively complex. Additionally, CARNA relies on a number of third parties to perform certain parts of the process.
- CARNA satisfies many of the assessment criteria. However, there are a number of areas where improvements can and likely should be made.
- We have made a total of 15 recommendations. The recommendations are set out and described at pages 24 to 41 and summarized in Appendix "B" to this review.

- Most of the recommendations relate to ways that CARNA can improve the IEN registration process. This means that even if we ultimately determined that CARNA satisfies the assessment criteria, there may still be ways in which CARNA can advance or progress.
- However, there are also a few sources or points of particular concern in the process. These primarily relate to fairness and accessibility. Most notably:

We are concerned that the IEN registration process should be more transparent. Transparency means that applicants must be able to see how the registration process works. It also includes making information readily available and ensuring that the available information is complete, clear and easy to understand. Transparency is also important as it relates to decision making. A decision may be reasonable, but if the applicant does not understand what the decision was or why it was made, the process is flawed.

With this in mind, we have recommended that CARNA update its webpage to further clarify the IEN registration process and provide some additional information about the time and cost associated with various steps in the process and the process as a whole. We have also recommended that CARNA disclose much of the information or criteria that it uses during the decision making process to applicants and that CARNA provide applicants with more information about how decisions were reached or the reasons for the decisions in the letters that it provides to applicants.

We are also concerned that the IEN registration process is not as accessible as it can or should be. Accessibility requires that the IEN registration process, including the various steps in the process, are available and attainable for applicants. It also means that registration as an IEN is ultimately a real possibility.

With this in mind, we have recommended that CARNA closely consider ways in which to reduce the time and money required to complete the process.

- In most cases, the concerns or issues that we have identified are not really CARNA's, or any individual at CARNA's, "fault". Instead, most of the concerns seem to be somewhat inherent in the process and/or caused by a third party involved in the process. However, having said this, responsibility over the IEN registration process still lies with CARNA. As such, it falls to CARNA to take whatever steps it can to rectify or at least alleviate any shortcomings and we have included recommendations that relate to third parties as well.
- Although we have identified some specific recommendations, it is up to CARNA and potentially Council to consider the issues that have been raised and the recommendations that have been provided to determine how to proceed.

The College & Association of Registered Nurses of Alberta

CARNA is the professional and regulatory body for Alberta's more than 37,000 registered nurses, including nurses in direct care, education, research and administration as well as nurse practitioners. CARNA's dual mandate centers on serving the public interest: as a regulator by ensuring ethical, safe, competent care by registered nurses and, as an association, by supporting the pursuit of excellence in registered nurses practice.

CARNA is informed by the principles of "right touch regulation".¹ This refers to an approach to regulation that seeks to find the appropriate amount of regulatory force to achieve a particular outcome. It is not "light touch regulation", nor is it a heavy handed blunt tool. Rather it seeks to regulate with both fairness to all involved while at the same time protecting the public.

There are six main principles underlying right touch regulation:

- 1) Proportionate: Regulators should only intervene when necessary. Remedies should be appropriate to the risk posed and costs identified and minimized.
- 2) Consistent: Rules and standards must be in alignment and implemented fairly.
- 3) Targeted: Regulations should be focused on the problem and minimize side effects.
- 4) Transparent: Regulators should be open and keep regulations simple and user friendly.
- 5) Accountable: Regulators must be able to justify decisions and be subject to public scrutiny.
- 6) Agile: Regulation must look forward and be able to adapt to anticipated change.²

In the context of registration, including the registration process for IENs, right touch regulation requires that qualified applicants can apply and be accepted in a fair and timely process, while also ensuring that unqualified applicants are not registered.

¹ Professional Standards Authority, "Right-Touch Regulation", October, 2015, available online at: <https://www.professionalstandards.org.uk/docs/default-source/publications/thought-paper/right-touch-regulation-2015>.

² *ibid.*

Scope of Review and Methodology

This review considered most aspects of CARNA's registration process for IENs. It did not consider the registration process in respect of new graduate applicants, applicants registered in other Canadian jurisdictions or nurse practitioner applicants. The review also did not consider any other aspects of CARNA's functions, such as professional discipline.

The methodology used for this review was designed to ensure that the reviewers obtained relevant information required to conduct a thorough and impartial review of CARNA's registration process for IENs. The main goals of the review were to determine if CARNA's registration process for IENs: is compliant with the legislation; is fair; is accessible; and offers adequate protection to the public.

A detailed summary of the methodology used is as follows:

- 1) Developed the assessment criteria using:
 - a) the "Standards of Good Regulation"³ prepared by the Professional Standards Authority (PSA) and applied in the PSA's "review conducted for the College of Registered Nurses of British Columbia"⁴;
 - b) regulatory principles associated with high performance regulators;
 - c) the Ontario Office of the Fairness Commissioner's "Registration Practices and Assessment Guide: For Regulated Professions and Health Regulatory Colleges";⁵ and
 - d) third party reviews of other regulators conducted by Field Law;
- 2) Gathered information from the following sources:
 - a) In-person interviews and meetings between Field Law and executive and administrative staff members at CARNA;
 - b) CARNA's written policies and procedures;
 - c) CARNA's website;
 - d) CARNA's template letters;
 - e) actual applications for registration that CARNA has received from IENs;
- 3) Reviewed the legislation, including the *Health Professions Act*⁶ and the *Registered Nurses Profession Regulation*⁷ (we also reviewed a draft of the amended version of the *Regulation*);
- 4) Reviewed internal trade agreements;
- 5) Reviewed the processes of various other third parties that are involved in or perform certain parts of CARNA's registration process for IENs;

³ Professional Standards Authority, "The Performance Review Standards: Standards of Good Regulation", January, 2016, available online at: https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-of-good-regulation.pdf?sfvrsn=e3577e20_6.

⁴ Professional Standards Authority, "A review conducted for the College of Registered Nurses of British Columbia", April, 2016, available online at: https://www.crnbc.ca/crnbc/Announcements/2016/Documents/PSA_review_April2016.pdf.

⁵ Office of the Fairness Commissioner's "Registration Practices and Assessment Guide: For Regulated Professions and Health Regulatory Colleges", March, 2016, available online at: http://www.fairnesscommissioner.ca/files_docs/content/pdf/en/OFC_RPAG_Pro-and-Health-Regulatory-Colleges.pdf.

⁶ RSA 2000, c H-7.

⁷ Alta Reg 232/2005.

- 6) Reviewed the registration requirements of other registered nurses organizations from other jurisdictions; and
- 7) Reviewed the registration requirements of other organizations under the Act.

This methodology allowed us to obtain a holistic view of the IEN registration process and also to consider different perspectives of those involved in the process, from applicants to administrators to decision makers.

Assessment Criteria

The assessment criteria were designed to evaluate the IEN registration process to determine if CARNA is meeting its goals of complying with the legislation, being transparent, objective, impartial and fair and offering adequate protection to the public.

The assessment criteria are as follows:

- 1) Is the IEN registration process consistent with the *Act* and the *Regulation*?
- 2) Is the IEN registration process fair, meaning is it objective, impartial, transparent and timely?
- 3) Is the IEN registration process accessible?
- 4) Does the IEN registration process ensure that only those applicants who meet the requirements become registered nurses? Does it provide sufficient protection for the public?
- 5) Is the IEN registration process consistent with the principles established in applicable trade agreements?
- 6) Is there a mechanism in place for CARNA to assess its criteria and the IEN registration process on a continuous basis?

Each of these criterion is discussed below in further detail.

1) Is the IEN registration process consistent with the *Act* and the *Regulation*?

As a regulator with delegated statutory authority, CARNA must align its processes with the statutory framework under which it operates.

The *Act* provides a framework for registration of all health professionals regulated under it. The requirements are set out in section 28. These include evidence of competence, through one of the following pathways: (1) the regular pathway of completing approved educational requirements, experience and examinations; (2) the equivalent jurisdiction pathway where an individual is registered as a registered nurse in an equivalent jurisdiction; or (3) the substantial equivalency pathway where an individual who does not meet the technical requirements of the regular pathway is registered as having education and experience substantially equivalent to the requirements under the regular pathway.

Section 28 also imposes additional requirements, including an application fee, evidence of insurance, Canadian citizenship or work permit and good character.

Sections 3-13 of the *Regulation* set out further details in respect of registration. Like the *Act*, the *Regulation* contemplates three streams for registration (this is unchanged by the likely amendments to the *Regulation*).

We considered whether the IEN registration process was in line with this legislative framework.

2) Is the IEN registration process fair?

CARNA is responsible for providing access to the profession and is duty bound to treat applicants fairly. Some of the hallmarks of fairness in the context of registration include: objectivity, impartiality, transparency and timeliness.

Objectivity in this context means that the criteria for registration can be measured with verifiable information or data. Similarly, the process should be reliable to deliver consistency in results. Consistency means that applicants in similar circumstances can expect similar outcomes. This helps to create confidence in the system and predictability for applicants, educational institutions, the profession and the public.

Impartiality is related to objectivity. It requires that decision makers make decisions based on objective criteria, without bias, prejudice or favouritism. An impartial registration process is a neutral one without subjective assessment.

Another important element of fairness is transparency. This means that applicants must be able to see how the registration process works. It also includes making information readily available and ensuring that the available information is complete, clear and easy to understand. Transparency is also important as it relates to decision making. A decision may be reasonable, but if the applicant does not understand what the decision was or why it was made, the process is flawed.

Timeliness is another hallmark of fairness. A significantly delayed decision will create unfairness for an applicant because the person's professional life is put on hold while waiting for the decision. Significant delay can make the registration process unfair even where the decision is otherwise objective, impartial and transparent.

In reviewing CARNA's IEN registration process, we considered these principles and the following questions:

- a) Do applicants understand the IEN registration process?
- b) Are the criteria used by CARNA to make decisions objective? Do registration decisions depend on personal viewpoints? Are the criteria based on formal systems, tools and procedures that have been tested and found to be valid and reliable?
- c) Are the criteria applied in a consistent manner?
- d) Are the criteria disclosed to applicants and is information about the criteria complete, accurate and easy to understand?
- e) Are decisions impartial? Are they made without bias, prejudice and favoritism?
- f) Are decisions communicated in an appropriate manner?
- g) Is the process completed in a timely manner?
- h) Are IENs treated similarly to other types of applicants?

3) Is the IEN registration process accessible?

Accessibility is closely related to fairness and requires that the IEN registration process, including the various steps in the process, are available and attainable for applicants. It also means that registration as an IEN is ultimately a real possibility.

Two of the most common impediments to accessibility are time and money. For example, if the IEN registration process or a step in the process costs too much money or takes too much time, an applicant may not be able to proceed with their application. Another significant obstacle could be distance or location. For example, if a certain step in the process can only be completed in a certain location, this may prevent an applicant from being able to complete that step. Other personal facts or circumstances may also impact accessibility.

4) Does the IEN registration process ensure that only those applicants who meet the requirements become registered nurses? Does it provide sufficient protection for the public?

In order to fulfill its mandate to protect the public, CARNA is responsible for ensuring that only those applicants who are competent to engage in registered nursing are granted registration. We reviewed the IEN registration process to assess whether CARNA is ensuring that IENs meet the minimum standards required to be granted registration as registered nurses.

5) Is the IEN registration process consistent with the principles established in applicable trade agreements?

The Canadian Free Trade Agreement (CFTA) (which replaced the Agreement on Internal Trade (AIT)) and the New West Partnership Trade Agreement (NWPTA) are interprovincial trade agreements which reduce barriers to trade between provinces. Alberta is a signatory to both the CFTA and the NWPTA, and, accordingly, bound by these agreements.

The labour mobility provisions of the CFTA (Chapter 7) state that certified workers have to be recognized as qualified to work by a regulatory body in another province or territory which regulates that occupation, without having to go through significant additional training, work experience, examination or assessment, unless an exception has been posted. The CFTA and the NWPTA also establish the need for provincial regulators to reconcile regulatory differences, to the extent possible, in order to facilitate the free movement of professionals across Canada.

At the same time, the CFTA and the NWPTA also acknowledge that the primary role of regulatory bodies is to set the standards necessary to ensure public safety, consumer protection and the integrity of the profession (see Article 705 of the CFTA). Trade agreements must not undermine this fundamental mandate of regulatory bodies.

For greater certainty, the CFTA and the NWPTA only apply to IENs if they are already registered with the nursing regulatory body in another Canadian province or territory and neither the CFTA nor the NWPTA impose any obligations on CARNA in respect of IENs who are not already registered in another jurisdiction in Canada.

We considered how the IEN registration process lines up with the CFTA and the NWPTA.

6) Is there a mechanism in place for CARNA to assess its criteria and the IEN registration process on a continuous basis?

Process improvement is important for all organizations. It prevents entrenched mistakes from taking root and ensures that policy and direction can change in order to facilitate new understanding and knowledge. We considered whether CARNA has mechanisms in place to review and consider possible changes, including whether it has the ability to receive both internal feedback from staff members and officers of CARNA and from applicants and third parties.

Overview of the Legislation

CARNA is created by legislation and derives all of its authority to regulate the profession of nursing from the *Act* and the *Regulation*. CARNA does not have any inherent jurisdiction or authority. All of its power comes from the governing legislation and so CARNA is bound by the governing statutory framework.

The principle piece of legislation that applies to CARNA is the *Act*. Section 28 of the *Act* sets out the general rules for registration for all health professions under the *Act*. Profession specific rules relating to education and experience credentials are then established in sections 3-13 of the *Regulation*.

Bylaws and policies are also important governance tools, but are not considered governing legislation. They assist regulators in creating specific rules for the general principles set out in the *Act* or the *Regulation*. However, they cannot override the framework of the *Act* and the *Regulation*. Bylaws and policies are sometimes referred to as “subordinate” legislation because they are dependent on the governing legislation. Any bylaws or policies should be drafted in compliance with the framework established in CARNA’s governing legislation.

The *Act* and the *Regulation* establish the registration framework with three different pathways to registration, which are as follows:

- 1) the regular pathway of completing approved educational requirements, experience and examinations;
- 2) the equivalent jurisdiction pathway where an individual is registered as a registered nurse in an equivalent jurisdiction; or
- 3) the substantial equivalency pathway where an individual who does not meet the technical requirements of the regular pathway is registered as having education and experience substantially equivalent to the requirements under the regular pathway.

Each of these pathways will be discussed in some detail below. Following that, some other important legislative provisions that apply in respect of each of the three pathways will be highlighted.

1) The regular pathway

The regular pathway is the primary way in which most applicants enter the profession. It is described in section 28(2)(a) of the *Act* and section 3 of the *Regulation*. Section 28(2)(a) of the *Act* provides:

An applicant may provide evidence of competence in the practice of the profession

- (a) by fulfilling one or more of the following as required by the regulation:
 - (i) education requirements, that may include being enrolled in a program of studies,
 - (ii) experience requirements,
 - (iii) successful completion of examinations, or
 - (iv) holding certificates or diplomas

The specific requirements for registered nurses are outlined in section 3 of the *Regulation*:

An applicant for registration as a regulated member on the registered nurse register must

- (a) have successfully completed as an education requirement either

- (i) on and before December 31, 2009, a diploma or baccalaureate degree in nursing from an approved nursing program undertaken in Alberta, or
 - (ii) on and after January 1, 2010, a baccalaureate degree in nursing from an approved nursing program undertaken in Alberta,
- and
- (b) pass the registration exam.

For education requirements, section 3(1)(a) contemplates that the baccalaureate degree (or diploma if obtained before January 1, 2010) must be from an approved nursing program that is undertaken in Alberta. As such, section 3(1)(a) immediately prevents IENs from registration under the regular pathway: by virtue of the fact that they are internationally educated, their education will not be from an approved nursing program that is undertaken in Alberta.

2) The equivalent jurisdiction pathway

The second pathway is through equivalent jurisdiction. Section 28(2)(b) of the *Act* provides:

An applicant may provide evidence of competence in the practice of the profession

...

- (c) by being registered with a profession in another jurisdiction recognized by the regulations or the council as having substantially equivalent competence and practice requirements and meeting the requirements for persons to be registered with that profession in that jurisdiction

The *Act* requires the equivalent jurisdiction to have “substantially equivalent competence and practice requirements” as CARNA. That is, the *Act* frames the requirements in terms of the practice of registered nursing and competence to practice. The *Regulation* frames things slightly differently. The *Regulation* requires the equivalent jurisdiction to have “substantially equivalent registration requirements” as CARNA. Section 8 of the *Regulation* provides:

(1) An applicant for registration on the registered nurse register who is currently registered in good standing in another jurisdiction recognized by the Council under section 28(2)(b) of the *Act* as having substantially equivalent registration requirements is eligible to be registered on the registered nurse register.

(2) An applicant under this section must provide evidence satisfactory to the Registrar of, within the previous 5 membership years,

- (a) 1125 hours of registered nursing practice,
- (b) successful completion of a degree or a nursing program satisfactory to the Registrar, or
- (c) successful completion of a nursing refresher program satisfactory to the Council

Accordingly, when an applicant is registered on the general register in another jurisdiction recognized by Council and then applies under this pathway, CARNA simply looks to whether the applicant satisfies one of the criteria referred to in section 8(2) of the *Regulation*. CARNA does not review any of the applicant’s other specific credentials.

At present, pursuant to the direction of Council, only applicants from other jurisdictions in Canada are considered and accepted under this pathway. So, for example, an applicant who is currently registered

in good standing somewhere in the United States of America or some other country will not be considered under the equivalent jurisdiction pathway.

It is possible for an IEN to be registered under this pathway, but only if they have already been registered on the general register in another Canadian province or territory and one or more of the requirements set out in section 8(2) of the *Regulation*, referred to above, is satisfied.

3) The substantial equivalency pathway

The final pathway to registration occurs when an applicant has not met the technical requirements of the regular pathway and was not registered in an equivalent jurisdiction. Notwithstanding these things, an applicant may be eligible for registration on the general register where they possess a combination of education, experience, practice or other qualifications that demonstrate the competence required for registration.

The substantial equivalency pathway is described in section 28(2)(c) of the *Act* as follows:

An applicant may provide evidence of competence in the practice of the profession

...

- (c) by satisfying the registrar, the registration committee or competence committee, of having as determined in accordance with the regulations, a combination of education, experience, practice or other qualifications, that demonstrates the competence required for registration as a regulated member.

This pathway is designed to ensure that the combination of education, experience, practice or other qualifications leads to the same level of competence as persons applying under the regular pathway. It is not intended to lower standards of professional competence in Alberta.

Section 9 of the *Regulation* sets out:

(1) An applicant who does not meet the requirements under section 3 but whose qualifications have been determined by the Registrar under section 28(2)(c) of the *Act* to be substantially equivalent to the registration requirements set out in section 3 may be registered on the appropriate register.

(2) In determining whether or not an applicant's qualifications are substantially equivalent under subsection (1), the Registrar may require the applicant to undergo examinations, testing and assessment activities to assist with the determination.

(3) The Registrar may direct the applicant to undergo any education or training activities the Registrar may consider necessary in order for the applicant to be registered.

(4) An applicant under this section must have passed the registration exam and must provide evidence satisfactory to the Registrar of, within the previous 5 membership years,

- (a) 1125 hours of registered nursing practice,
- (b) successful completion of a degree or a nursing program satisfactory to the Registrar, or
- (c) successful completion of a nursing refresher program satisfactory to the Council.

(5) Despite subsection (4), the Registration Committee may waive the requirement to have passed the registration exam if there are extenuating circumstances and the Registration Committee is of the opinion that the applicant has sufficient registered nursing experience, knowledge and competence.

4) Other important legislative provisions

There are a number of other important legislative provisions in the *Act* and the *Regulation* that apply across the board and in respect of each of the three pathways. Of particular note:

- the registrar must consider the application and make a decision as soon as reasonably possible (section 29(3) of the *Act*);
- once a decision is made, an applicant may request to review the documents used and created by the registrar, registration committee or competence committee when considering their application (section 30(4) of the *Act*);
- an applicant may request a review by council if they are not notified of the decision on their application within 120 day after they received notice that their application for registration was complete (section 30(5) of the *Act*);
- an applicant may also request a review by council if their application is accepted subject to conditions, deferred or refused and the college may charge a fee for this review (section 31 of the *Act*);
- an applicant for registration may only take the registration exam three times (although there are exceptions for where the applicant completes another approved nursing program or there are extenuating circumstances) (section 10 of the *Regulation*). Under the amended version of the *Regulation*, there will be no limit on the number of times that an applicant will be permitted to take the registration exam (although the applicant will only be permitted to take the registration exam for a certain period of time following completion of their education);
- an applicant under the equivalent jurisdiction pathway or the substantial equivalence pathway must have “currency”, which means that, in the last five years, they must have: 1,125 hours of registered nursing practice; successfully completed a degree or nursing program satisfactory to the Registrar; or have successfully completed a nursing refresher program satisfactory to Council (sections 8 and 9 of the *Regulation* or section 10.1 of the amended version of the *Regulation*);
- all applicants must provide evidence satisfactory to the Registrar of having good character and reputation, which may require an applicant to provide a written reference from an employer or educational institution with respect to the applicant’s nursing practice (section 11 of the *Regulation*); and
- if an applicant’s first language isn’t English, they must demonstrate proficiency in the English language (section 13 of the *Regulation*).

Bylaws and policies, again, while not governing legislation, also apply here. The relevant Bylaws are referred to below. However, in respect of policies, we have not extensively considered them as part of this review as we understand that they are currently being redrafted. We look forward to providing our comments on the drafts in due course.

Overview of CARNA's IEN Registration Process

CARNA's IEN registration process is relatively complex. Not only does it involve a number of different steps, but many of those steps are undertaken by third parties.

A. Decision makers

The *Act* requires that all applications for registration be considered by the Registrar. However, the *Act* also allows the Registrar to, subject to the bylaws, delegate its power to one or more other persons or committees.⁸

Under CARNA's Bylaws, the Registrar may refer any application for registration to the Registration Committee or the Competence Committee.⁹ The Registrar may also delegate in writing all or any of their duties and responsibilities to another staff member.¹⁰

CARNA currently employs four registered nurse consultants. All registered nurse consultants have the delegated authority of the Registrar to make decisions and when decisions go out, they go out under the name of the registered nurse consultant who made the decision.

B. Steps in the IEN registration process

The IEN registration process involves the following steps.

1) **IEN must satisfy the English language proficiency requirement**

Pursuant to the standards approved by Council, an IEN will meet the requirement contained in section 13 of the *Regulation* if English is deemed to be their first language, which means it is the language that they learned at home as a child, and it is the language they primarily use for reading, writing, listening and speaking.

According to the standards, the requirement can also be met by providing evidence of:

- safe practice working as a registered nurse within the past two years outside of Canada for a minimum of 1,125 hours where services were provided in English and the primary language of the nursing practice setting and its clients was English; or
- successful completion within the past two years of any nursing clinical education or courses required by the Registrar for the applicant to be registered that have been taught in Canada in English where health care services were provided in English and the primary language of the nursing practice setting and clients was English.

If an IEN is unable to establish any of these things, they will need to demonstrate their English language proficiency by:

⁸ Section 20.

⁹ Section 16.1(3).

¹⁰ Section 16.1(4).

- taking an approved English language test (either the Canadian English Language Benchmark Assessment for Nurses, which costs \$395 to write, or the International English Language Testing System, which costs approximately \$310);
- achieving at least the minimum scores in all components of the test;
- ensuring that the test results are, at least at the time of first application and time of registration, less than two years old (if the results are more than two years old, the IEN will be required to re-take the test);
- sending CARNA a copy of the test results; and
- arranging for the original test to be sent directly to CARNA from the test centre.

2) IEN must apply to the National Nursing Assessment Service

The National Nursing Assessment Service (NNAS) is a body of nursing regulatory bodies that collectively developed a harmonized approach to the initial assessment of IENs.

The NNAS application fee is \$650, in United States dollars, and the process includes the following steps:

- create an account;
- submit proof of identity documents;
- submit a nursing education form;
- submit a nursing registration form;
- submit a nursing practice/employment form; and
- submit language testing results.

NNAS then performs a very preliminary evaluation of the of the applicant's education. NNAS' role here is basically limited to collecting, authenticating and validating documents and then considering whether the education program is even comparable to a nursing education program in Canada. The eventual "advisory report" has three possible outcomes: "Comparable"; "Somewhat Comparable"; and "Not Comparable".

During the application process, the applicant must select a province for their application. When the advisory report is finished, which takes anywhere between three and 12 months, NNAS sends the advisory report to the regulatory body in that province.

NNAS offers that an applicant may bring an appeal to NNAS if they are dissatisfied with the outcome of an assessment performed by NNAS. If, after an initial review, NNAS determines that there are grounds for appeal, the applicant is required to pay \$500 for the appeal.

3) IEN must apply to CARNA

Once NNAS completes its advisory report, the IEN may apply to CARNA. To do this, the IEN must create a MyCARNA account, complete an application for assessment and pay a non-refundable fee of \$169.

The IEN must then complete and submit the following forms to CARNA:

- currency of registered nursing practice hours update form. The currency form requires the IEN to disclose the number of hours that they worked as a registered nurse, and in which jurisdiction, over the preceding five years; and
- documentation of registered nursing experience/practice form. The experience form requires the IEN to disclose descriptions and other details of their nursing work experience in respect of all employment after their initial registration as a registered nurse.

During this stage of the process, registration assistants are responsible for ensuring that the IEN's application to CARNA is complete and in order.

4) The application is reviewed by a nurse consultant

Once CARNA receives a complete application, the application (including the advisory report sent directly to CARNA from NNAS, the application for assessment, the currency form and the experience form) are reviewed by a nurse consultant.

There are three possible outcomes at this stage of the review.

- 1) the nurse consultant may determine that the applicant is ineligible;
- 2) the nurse consultant may determine that the applicant is immediately eligible to receive a temporary permit to practice while they proceed to the next steps of writing the registration examination and working to fulfill the reference requirement; or
- 3) the nurse consultant may determine that the application should be deferred while the applicant completes the Alberta registered nurse assessment program (ARNAP).

The third outcome will be described in further detail below. Before this, however, it bears noting that in deciding which of these three outcomes is appropriate, the nurse consultant considers an "Initial Assessment Criteria Checklist". This Checklist includes criteria like the following:

- Was the applicant educated as a registered nurse?
- Was the applicant educated at a post-secondary equivalent level?
- How long has it been since the applicant graduated?
- Was the applicant licensed in the jurisdiction in which they were educated?
- How long has it been since the applicant practiced as a registered nurse? Ten years? Five years? One year?
- Has the applicant failed a Canadian registered nurse registration examination three times?
- Does the applicant have currency (meaning has the applicant worked 1,125 hours or graduated within the last five years)?

The Checklist has its origins in CARNA's "Learning from Experience: Improving the Process of International Educated Nurses' Applications for Registration" (LFE) Project.

The LFE Project sought to use evidence to improve the efficiency of the IEN registration process. The strategies included the following:

- collect and analyze IEN application data;
- identify trends, strengths and gaps in IEN groups;

- understand application characteristics as related to the outcomes of the substantially equivalent competence assessment and to the need for additional education; and
- compare the success rates on the national registered nurse examination and final registration outcomes of groups of applicants.

The results of all of this were then used to create the Checklist, which was implemented in 2013.

The application of the Checklist indicates which of the outcomes (ineligible, immediately eligible or deferred) is the most appropriate. However, despite the Checklist, the nurse consultant maintains discretion to decide.

The nurse consultant typically makes their decision in consultation with all of the other nurse consultants. In some situations, the nurse consultant may also consult with the Registrar.

Once the nurse consultant makes a decision, that decision is communicated to the IEN in a letter which is sent by registered mail.

a) If required, the IEN must complete the ARNAP

Turning back to the third possible outcome, which is that the nurse consultant may determine that the application should be deferred while the applicant completes the ARNAP, this outcome will be selected where the nurse consultant requires more information in order to determine the application.

The ARNAP is a standardized exam that tests the knowledge, skill and judgement of IENs seeking nursing registration in Alberta. The program was created by Touchstone Institute.

Before the ARNAP and up until June, 2017, CARNA used the Substantially Equivalent Competency (SEC) Assessment. The SEC Assessment, like the ARNAP, was an assessment designed to evaluate whether an IEN possessed substantially equivalent competencies for practice as a registered nurse in Alberta. It was administered by Mount Royal University, but it is no longer offered.

When CARNA received notice that the SEC Assessment would no longer be offered, it released a request for tender for the service. CARNA received two bids in response. One of them was from Touchstone, the organization responsible for providing the equivalent assessment in Ontario. Touchstone proposed to work with CARNA to modify their assessment to test for CARNA's entry to practice competencies. The other bidder proposed to work with CARNA to create an assessment from scratch. The bid from Touchstone was chosen, mostly because it was significantly cheaper than the other bid.

The ARNAP is a one day exam consisting of two parts:

- multiple choice question examination (up to 97 questions in 2.5 hours of writing time); and
- objective structured clinical examination (OSCE) (12 stations which are 13 minutes each).

There are a few other things about the ARNAP that should be noted here:

- the ARNAP is currently offered twice a year (in January and June) in Calgary and Edmonton and;
- the ARNAP report is sent to directly to CARNA. It takes 12-16 weeks for Touchstone to score the test and provide the report to CARNA;

- the fee for taking the ARNAP is determined by Touchstone and CARNA has no say or involvement in determining what the fee is. It is currently \$1,900;
- like the ARNAP, the SEC Assessment also included an OSCE component, however, there were a very limited number of test scenarios and so IENs were not typically allowed to take the SEC Assessment more than once as it was thought that this might jeopardize the integrity of the test and its results. The ARNAP includes many different test scenarios and so the same concern about the integrity of the test and its results no longer exist. However, IENs are still only allowed to take the ARNAP once.

Under Touchstone's own policy, an applicant may request a re-examination of existing data by Touchstone to confirm the correctness of data analysis and interpretation. Touchstone does not allow for OSCE stations to be reviewed or re-rated. Touchstone also does not allow a candidate an opportunity to re-sit the assessment. The rescore fee is \$200.

A slight variation of this outcome (that the nurse consultant may determine that the application should be deferred while the applicant completes the ARNAP) is also possible. The slight variation on this outcome is that the nurse consultant may give the IEN the option to proceed directly to bridging education without ever completing the ARNAP. As will be discussed in further detail below, the purpose of the ARNAP is to provide the nurse consultant with further information in order to determine if the applicant should be required to complete bridging education. In the variation here, the applicant is effectively given a choice between completing the ARNAP to determine what, if any, bridging education is required and proceeding directly to completing the entire bridging education. Once the IEN chooses between these two options, they cannot change their mind.

b) The ARNAP results are reviewed by the nurse consultant

Once CARNA receives the ARNAP report, the nurse consultant reviews the results.

Of note, much of the report itself contains raw data and is not easily understandable. However, the report does set out the IEN's scores and explains that if the IEN's total OSCE score is greater than or equal to 3.5 and the total multiple choice score is greater than or equal to 68%, then the IEN has "Demonstrated Competence". If the IEN does not achieve these scores, then the other possible outcomes are "Partially Demonstrated" or "Not Demonstrated".

Using the ARNAP report, in addition to all of the other information already available to the nurse consultant (such as the report from NNAS, the application for assessment, the currency form, the experience form and the Checklist), the nurse consultant then decides between the following three outcomes:

- 1) the applicant is ineligible;
- 2) the applicant is immediately eligible to receive a temporary permit to practice while they proceed to the next steps of writing the registration examination and working to fulfill the reference requirement; or
- 3) the IEN must complete bridging education.

The time required for a nurse consultant to make this decision is somewhat variable. However, if the IEN took the ARNAP in June (as opposed to in January), there can be delays due to the fact that CARNA will

then receive the ARNAP report from Touchstone when it is in the midst of its annual registration renewal process.

Again, the nurse consultant typically makes their decision in consultation with all of the other nurse consultants and the decision is communicated to the IEN in writing.

c) If required, the IEN must complete bridging education

In some instances, an IEN may only be required to complete a few select courses. However, much more frequently, an IEN is required to complete the entire “Bridge to Canadian Nursing Program”.

The Bridge to Canadian Nursing (BCN) Program is only offered through Mount Royal University and includes a total of 10 nursing theory courses as well as a 192 hour clinical component. Each course takes approximately four to six weeks to complete (meaning that the entire program takes anywhere from eight to 15 months to complete). While the 10 nursing theory courses can be completed by distance, the clinical component must be completed in Calgary.

As there are a limited number of spots available in the BCN Program, it is not uncommon for there to be a wait list of between 12 and 18 months to even start the program.

The cost of the full BCN Program is heavily subsidized by the Government of Alberta. However, it still costs the applicant approximately \$5,300.

If the IEN is only required to complete a few select courses, it may be possible for them to complete those courses through another educational institution (such as MacEwan University). However, the cost will not be subsidized by the Government then as only Mount Royal University and the BCN Program are subsidized.

5) IEN must apply to write the registered nurse exam

IENs, like any other applicant hoping to practice as a registered nurse in Alberta who hasn't already passed a Canadian licensing exam, must pass the National Council Licensure Examination (NCLEX) exam.

There is a fee of \$360 to write the NCLEX.

At this time, all applicants may only write the NCLEX three times (although there are exceptions for where the applicant completes another approved nursing program or there are extenuating circumstances). However, under the amended version of the *Regulation*, there will be no limit on the number of times that an applicant will be permitted to take the registration exam (although the applicant will only be permitted to take the registration exam for a certain period of time).

6) IEN must apply for temporary registration so that they can obtain satisfactory Alberta employer references

An IEN must submit an application for temporary registration so that they can obtain satisfactory Alberta employer references to meet the good character requirement.

Temporary permits have a start and expiry date and can only be used for six months. Temporary permits may be subject to conditions related to supervision and employment setting.

Under the amendments to the *Regulation*, temporary registration will be replaced by provisional registration. It is contemplated that all provisional permits will include a condition of indirect supervision and that this will significantly impact the number of jobs potentially available to IENs as some employers may be unable or unwilling to hire someone who requires indirect supervision.

Also of note, this step, of needing to apply for temporary registration to obtain satisfactory Alberta employer references, does not exist in respect of applicants who are recent graduates from approved entry-level nursing education programs in Canada. These applicants are eligible to apply for registration as registered nurses as soon as they pass the NCLEX.

7) IEN may apply for RN registration

Once an IEN passes the NCLEX and obtains their satisfactory Alberta employer references, they may apply for registration as registered nurses in Alberta.

C. Reviews

If an applicant is determined to be ineligible at any stage, or if the applicant is required to complete the ARNAP and/or bridging education, the applicant may request a review of that decision by Council.

Pursuant to section 18.1 of CARNA's Bylaws, Council has delegated its authority to hear and determine reviews to the Registration Review Committee. This Committee is composed of up to seven persons appointed by Council, at least five of whom are to be registered nurses.

Under section 31(6) of the *Act*, CARNA is permitted to charge a fee for a review in accordance with its Bylaws. Section 15.1 of the Bylaws in turn provides that Council shall establish fees for registrations reviews under section 31 of the *Act*. At present, CARNA charges \$2,500 for a review.

Requests for reviews are quite rare. Between 2014 and 2018, only 13 requests for reviews from all types of applicants were received. Of those, five ended up being withdrawn. In respect of the eight reviews that went ahead, only three of them appear to have come from IENs and, in each case, the initial decision on registration was upheld.

Summary of Information Obtained from Interviews

We interviewed three individuals in the course of conducting this review. These individuals included executive and administrative staff members at CARNA. We also participated in a number of more informal discussions with various individuals at CARNA.

The purpose of the interviews and other conversations was to obtain information about the IEN registration process. In addition, the interviews provided us with the opinions and insights of individuals working within the system as to what works well and what does not. The interviews provided information and opinions on the following:

- the IEN registration process generally;
- the English language proficiency requirement;
- the Checklist and the LFE criteria;
- the ARNAP (and the previous SEC Assessment);
- the BCN Program;
- the timelines and costs associated with various steps in the IEN registration process;
- the quality of the decisions or outcomes of the IEN registration process; and
- the fact that IENs are required to apply for temporary registration after they pass the NCLEX but other applicants are not and may immediately register as registered nurses.

The individuals interviewed generally agreed that CARNA's executive and administrative staff members are extremely dedicated and work very hard to support CARNA's mandate. The issues that the individuals identified were primarily systemic in nature. Some of the main issues raised by the individuals in respect of the IEN registration process included:

- many applicants take extreme issue with the English language proficiency requirement and believe that the requirement should not apply to them;
- the ARNAP is not difficult enough and so not enough IENs are deemed to be ineligible (or screened out) at this earlier stage;
- the ARNAP is somewhat difficult to access since it is only offered twice a year and in two locations;
- IENs are not given the results of the ARNAP and it is not always clear to IENs why they are required to complete bridging education;
- IENs are generally only permitted to take the ARNAP once but the rationale behind that rule no longer exists;
- the BCN Program is very difficult to access as it often times has a waiting list of between 12 and 18 months. Additionally, the clinical component is offered in Calgary only;
- IENs must apply for temporary registration to obtain satisfactory Alberta employer references while graduates from approved entry-level nursing education programs in Canada may immediately apply for registration as registered nurses;
- some IENs may be obtaining registration as RNs in other provinces and territories, with no intention of ever actually practicing there, solely to avoid the IEN registration process in Alberta; and
- the cost of seeking a review from the Registration Review Committee is exorbitant and likely prevents many IENs from exercising their right to a review.

Consideration of Assessment Criteria and Recommendations

This section provides an analysis of the IEN registration process as measured against the assessment criteria. It also identifies some concerns that we have about the process and provides recommendations for CARNA to consider in respect of those concerns.

Although we have made a number of recommendations, we highlight that it is not our role to dictate the IEN registration process or CARNA's next steps. These types of decisions must be made by the appropriate decision makers after careful consideration. We hope that this review serves as a useful tool or aid.

A complete list of the recommendations is provided at Appendix "A" to this review.

1) Is the IEN registration process consistent with the *Act* and the *Regulation*?

The IEN registration process appears to align with the legislative framework set out in the *Act*, the *Regulation* and the Bylaws and we did not identify any instances where the IEN registration process was in outright conflict with the framework.

With this being said, we identified a couple of instances where the IEN registration process, or an element of it, might not perfectly align with the legislative framework.

First, section 29(3) of the *Act* requires that, when the Registrar receives a complete application from an applicant, the Registrar must "consider the application, and make a decision under section 30 and notify the applicant of the decision as soon as reasonably possible".

We are concerned that, because of various delays in the IEN registration process, it cannot be said that CARNA is doing the things referred to in section 29(3) as soon as reasonably possible. However, this concern is more relevant to whether the IEN registration process is fair than it is to whether the process is consistent with the *Act* and the *Regulation*. Because of this, this concern and our recommendations in respect of it will not be discussed here, but below.

Another element of the IEN registration process that may not perfectly align with the legislative framework relates to an applicant's ability to request a review when their application is accepted subject to conditions, deferred or refused. Section 31(1) of the *Act* sets out a right of review in these circumstances. Section 31(6) goes on to provide that a college may, in accordance with the bylaws, charge a fee for the review. As outlined above, CARNA currently charges \$2,500 for a review.

We are concerned that this charge is so high that it may dissuade or prevent an applicant from exercising their right to a review. In other words, the fee that CARNA charges for a review might effectively conflict with an applicant's right of review. Again, however, this concern is more relevant to whether the IEN registration process is accessible and so our discussion of it and our recommendations in respect of it will be discussed below under that heading.

2) Is the IEN registration process fair?

In discussing the IEN registration process and this review with various individuals at CARNA, it quickly became obvious that fairness in the IEN registration process is an extremely important priority for CARNA. In fact, this review was commissioned in part because of a desire to determine if the fairness of

the process could be enhanced. We commend CARNA for identifying these concerns and committing to taking action in respect of them.

We also wish to highlight here that the areas of concern or issues that we (and CARNA) have identified, are not really CARNA's, or any individual at CARNA's, "fault". Instead, most of the concerns seem to be somewhat inherent in the process and/or caused by a third party involved in the process.

However, having said this, the responsibility over the IEN registration process still lies with CARNA. As such, it falls to CARNA to take whatever steps it can to rectify or at least alleviate any shortcomings.

a) Do applicants understand the IEN registration process?

As mentioned above, the IEN registration process is relatively complex. It involves a number of different steps and a number of those steps are undertaken by various third parties. The involvement of third parties means that there are often times many steps even within a step. For example, the step of "applying to NNAS" actually involves the steps of:

- creating an account;
- submitting proof of identity documents;
- submitting a nursing education form;
- submitting a nursing registration form;
- submitting a nursing practice/employment form; and
- submitting language testing results.

To assist applicants in understanding the IEN registration process, CARNA's website includes a webpage, under the following headings: Registration & Renewal > Applicants > Internationally educated applicants.

This webpage essentially breaks the IEN registration process down into the following steps:

Before you apply

- Meet the English language proficiency requirement;

How to apply

- apply and pay an assessment fee to NNAS;
- create a MyCARNA account to submit your application for assessment and pay the non-refundable fee online;
- complete the currency of registered nursing practice hours update form and the documentation of registered nursing experience/practice form and email them to ien@nurses.ab.ca;
- CARNA will contact you after it decides whether: you are ineligible; you are immediately eligible to receive a temporary permit to practice while you proceed to the next steps of writing the registration examination and working to fulfill the reference requirement; or your application should be deferred while you complete the Alberta registered nurse assessment program and/or bridging education;
- take the ARNAP or complete bridging education;
- if you took the ARNAP, review your results and complete and specified bridging education;
- apply to write the RN registration exam;

- obtain satisfactory Alberta employer references by working as a graduate nurse in Alberta with a temporary permit; and
- apply for RN registration. If you took an English language proficiency test, make sure that the results are still valid.

Of note, many of the steps referred to above include hyperlinks which direct the applicant to additional information about the step. For example, by clicking on the reference to “NNAS”, the applicant is redirected to NNAS’ website. Many of the steps also refer to an estimated time needed to complete the step.

This webpage goes a great deal of the way when it comes to ensuring that applicants understand the IEN registration process. However, we are concerned that it does not go the whole way. More specifically, we are concerned that an applicant, after reviewing the webpage, may not fully comprehend:

- the various steps that may exist within any given step;
- the length of time that the process may take from start to finish; and
- the amount of money that they may have to spend in order to complete a step or the process as a whole.

By way of example, take the first step on the webpage of “applying to NNAS”. In actuality, this step actually involves a number of steps as set out above. Additionally, the estimated time needed to complete this step is listed on the webpage as “Variable”. The webpage also mentions an “assessment fee”, but the actual amount is not set out. Based on this information, an applicant might perceive that this step will be relatively easy and straightforward to complete. In reality, this step might be quite onerous for the applicant, the applicant might have to wait up to a year to receive the NNAS report and the applicant will have to pay \$650 (in United States dollars).

To alleviate this concern, we recommend that CARNA update the webpage to further clarify the IEN registration process and provide some additional information about the time and cost associated with various steps in the process and the process as a whole.

More specifically, we suggest that:

- the steps be outlined in the most simple and straightforward manner possible;
- if a step actually includes a number of steps, this is highlighted or emphasized;
- the steps clearly indicate who is required to do what (for example, “the applicant must apply to NNAS”, “NNAS will send its report to CARNA” and “CARNA will review the report it receives from NNAS”);
- the amount of time that completion of the step might take is stated for each step;
- for the fees that CARNA sets, the amount of the fee is stated; and
- for the fees that third parties set, the fact that there is a fee is mentioned and some indication is given as to the size of the fee.

We also suggest that the webpage include a couple of comments or warnings about the overall investment of time and money that may be required. This may help to ensure that applicants have more realistic expectations about the IEN registration process.

Recommendation #1: We recommend that CARNA update the webpage to further clarify the IEN registration process and provide some additional information about the time and cost associated with various steps in the process and the process as a whole.

We also recommend that CARNA consider providing some additional resources to applicants about the IEN registration process. It may be helpful for applicants to see a flowchart. A visual aid like this might be especially useful or helpful for applicants who have English as their second or third language.

It may also be helpful for applicants to be able to consult a hard copy of a brochure or pamphlet that includes more detail and guidance than the webpage referred to above. Given the complexity of the IEN registration process, it may be necessary for CARNA to essentially prepare a guide for applicants to follow.

Recommendation #2: We recommend that CARNA prepare some additional resources on the IEN registration process, such as a flowchart and a brochure or pamphlet.

b) Are the criteria used by CARNA to make decisions objective? Do registration decisions depend on personal viewpoints? Are the criteria based on formal systems, tools and procedures that have been tested and found to be valid and reliable?

A number of the steps in the IEN registration process involve the application or assessment of various criteria. These criteria tend to be quite objective. For example, in determining whether the English language proficiency requirement is met, the nurse consultant considers whether the IEN has achieved the minimum scores on an approved English language test.

In considering an IEN's application for registration, the nurse consultant also considers the things in the Checklist which include:

- Was the applicant educated as a registered nurse?
- Was the applicant educated at a post-secondary equivalent level?
- How long has it been since the applicant graduated?
- Was the applicant licensed in the jurisdiction in which they were educated?
- How long has it been since the applicant practiced as a registered nurse? Ten years? Five years? One year?
- Has the applicant failed a Canadian registered nurse registration examination three times?
- Does the applicant have currency (meaning has the applicant worked 1,125 hours or graduated within the last five years)?

Many of these criteria are largely objective as well. However, there is a subjective element to many of these criteria as well. For example, in assessing whether the applicant has currency, the nurse consultant may be required to make a judgment call as to what type of work will count towards the

required 1,125 hours. Further, the consideration of all of the criteria together involves some subjective analysis. It bears noting here, however, that it is okay for there to be some subjectivity in the process. In fact, the exercise of discretion requires room for subjective analysis. What matters the most under this criteria is that there are objective markers or anchors in the IEN registration process.

Turning to whether the criteria are based on formal systems, tools and procedures that have been tested and found to be valid and reliable, the Checklist requires highlighting.

As mentioned above, the Checklist has its origins in CARNA's LFE project which sought to use evidence to improve the efficiency of the IEN registration process. The strategies included the following:

- collect and analyze IEN application data;
- identify trends, strengths and gaps in IEN groups;
- understand application characteristics as related to the outcomes of the substantially equivalent competence assessment and to the need for additional education; and
- compare the success rates on the national registered nurse examination and final registration outcomes of groups of applicants.

The results of all of this were then used to create the Checklist, which was implemented in 2013. The Checklist has not been updated since then.

Given the importance of the Checklist and the passage of time since it was implemented, we recommend that the Checklist be re-evaluated and updated to ensure that all of the criteria included on the Checklist are still relevant and applicable and that the Checklist is not missing any criteria that should be included.

Recommendation #3: We recommend that the Checklist be re-evaluated and updated.

While not exactly a criteria used by CARNA to make decisions, we note here the rule that CARNA currently has in place which prevents IENs from taking the ARNAP more than once (although we understand that exceptions to this rule exist where there are extenuating circumstances).

As mentioned above, this rule has its origins in the SEC Assessment, which, like the ARNAP, included an OSCE component. However, for the SEC Assessment, there were a very limited number of test scenarios and so IENs were not normally allowed to take the SEC Assessment more than once as it was thought that this might jeopardize the integrity of the test and its results. Unlike the SEC Assessment, the ARNAP includes many different test scenarios and so the same concerns about the integrity of the test and its results no longer exist. However, IENs are still only allowed to take the ARNAP once.

We are concerned that this rule continues to exist even though the rationale or basis for the rule appears to be gone. It also strikes us as being somewhat incongruent or inconsistent that applicants may be given an unlimited number of attempts within which to pass the NCLEX under the amendments to the *Regulation*, but are only offered one chance at the ARNAP. Additionally, we note that the ARNAP itself includes a number of mechanisms to ensure that applicants don't take it an absurd number of times (namely, it is only offered every six months and it costs \$1,900). With all of these things in mind, we recommend that CARNA re-evaluate and likely remove the rule that applicants may only take the ARNAP once.

Recommendation #4: We recommend that CARNA re-evaluate and likely remove the rule which provides that applicants may only take the ARNAP once.

c) Are the criteria applied in a consistent manner?

The criteria in the IEN registration process tend to be applied by the nurse consultants. As mentioned above, there are four nurse consultants that review and decide on IEN applications. Also as mentioned above, the nurse consultants typically make their decisions in consultation with one another. There is nothing to indicate that the nurse consultants are not applying the criteria in a consistent manner.

Having said this, we were told that there may be some concern among IENs that decisions on IEN applications are inconsistent. For example, it was mentioned that IENs often times question why they are required to complete the ARNAP or the BCN Program when another IEN who was a classmate of theirs did not. We understand that the likely reason for this apparent inconsistency is that there were differences in some of the other criteria. That is, while two IENs may have completed the same nursing program, one IEN may have gone on to write the licensing exam and practice for five years while the other may have failed the licensing exam and never practiced at all. This concern is more relevant to whether the criteria are disclosed to applicants and so will be discussed immediately below.

d) Are the criteria disclosed to applicants and is information about the criteria complete, accurate and easy to understand?

As outlined above, applicants are given a fair amount of information about the IEN registration process. However, most of this information relates to the steps that applicants must take to complete the process. In contrast, applicants are provided with very little information about what criteria CARNA actually uses to make decisions.

Of specific note, CARNA and the nurse consultants appear to rely quite heavily on the Checklist. However, the Checklist is not mentioned anywhere on the webpage referred to above. In fact, very little is said about CARNA's decision making on the webpage. The only information on this point is as follows:

4. We will contact you with further instructions. We assess applications individually and in the order that we receive all the required documents. We will determine whether:

- You are eligible to proceed to the next steps of writing the registration examination and working in Alberta with temporary registration to fulfill the reference requirement.

- Your application is deferred until you complete the Alberta registered nurse assessment program (ARNAP) and/or bridging education (if applicable). A further assessment application with fee to CARNA will be required upon completion of the ARNAP or bridging program to proceed with registration requirements.
- You are not eligible to proceed with meeting the registration requirements.

There is absolutely nothing to indicate what criteria are considered or how CARNA decides between these three possible outcomes.

We are concerned that many of the decision making criteria are not disclosed to applicants and that applicants are not provided with any information about how decisions may be reached. The fact that IENs question why they are required to complete the ARNAP or the BCN Program when another IEN who was a classmate of theirs did not is indicative of this because it shows that applicants are under the impression that the decision boils down to what nursing program they took. In reality, their applications are decided based on so many other criteria.

We recommend that CARNA disclose much of the information included in the Checklist to applicants. More specifically, we suggest that this information should be included on the webpage. This may also help to alleviate concerns or criticisms about inconsistency in how the criteria are applied. For example, if applicants fully understand how many criteria are being considered, they may be less likely to contribute different outcomes to the inconsistent application of a single criterion.

Recommendation #5: We recommend that CARNA disclose much of the information included in the Checklist to applicants.

e) Are decisions impartial? Are they made without bias, prejudice and favoritism?

There is nothing to indicate that decisions concerning IEN applications are biased or prejudiced.

f) Are decisions communicated in an appropriate manner?

As referred to above, once the nurse consultant makes a decision, that decision is communicated to the IEN in a letter which is sent by registered mail. All of this is appropriate.

Based on our review of CARNA's template letters as well as our review of actual letters sent to applicants, we have some concerns about the content of the letters. More specifically, we are concerned that CARNA is not providing applicants with enough information about how the decision was reached or the reasons for the decision.

This concern mostly arises in cases where the decision is that the applicant:

- must complete the ARNAP;
- must complete bridging education; or
- is ineligible to proceed with their application.

In other words, this concern is more acute, and the reasons for the decision are much more important, when CARNA is giving an applicant “bad” news than when CARNA is giving an applicant “good” news.

In the letters that we reviewed, it was not uncommon for the reasons to be limited to a sentence or two as follows:

- the ARNAP showed gaps in knowledge and skills which are too significant to be addressed;
- the amount of time that has elapsed since you last practiced nursing is too significant to enable you to transition to practice in Alberta; and/or
- you have not practiced nursing since graduating from your nursing program and have not been able to consolidate your education which is an essential step in enabling you to transition to practice in Alberta.

We recommend that CARNA update its template letters and provide applicants with more information about how a decision was reached or the reasons for the decision. More specifically, CARNA might suggest including reference to some of the more relevant criteria in the Checklist in the letters.

Recommendation #6: We recommend that CARNA provide applicants with more information about how decisions were reached or the reasons for the decisions in the letters that it provides to applicants.

With specific reference to the letters sent to applicants after they complete the ARNAP, applicants are not provided with their ARNAP report. We understand that there are a couple of reasons for this:

- much of the report itself contains raw data that would not be easily understandable for applicants; and
- there is a concern that providing the report to an applicant may give rise to confusion and conflict. This is because the ARNAP report may indicate that the applicant “demonstrated competence” or “partially demonstrated competence”, but the IEN may still be required to complete all or some of bridging education (because of some other information in their application).

Notwithstanding these reasons, we are concerned that applicants are not being provided with the results of their ARNAP. We highlight here how significantly these results can affect an applicant: Since the ARNAP results are used to determine whether an applicant must complete bridging education, they could easily determine how the applicant spends the next eight to 15 months of their life.

Concerning the fact that the report itself contains raw data that might not be easily understandable for an applicant, we suggest that CARNA approach Touchstone to discuss whether Touchstone might be able to provide CARNA with the data in a more easy to understand and accessible format. In the alternative, or in the meantime, we suggest that the nurse consultants either:

- draft an interpretive tool to be sent to applicants along with their ARNAP reports; or
- summarize the ARNAP results as part of the decision letters.

Concerning the second concern, that providing the report to an applicant may give rise to confusion and conflict, we highlight that this issue might be easily addressed by our other recommendations that CARNA:

- disclose much of the information included in the Checklist to applicants; and
- provide applicants with more information about how a decision was reached or the reasons for the decision in the letters that it provides to applicants.

We also highlight here that section 30(4) of the Act provides that once a decision concerning registration is made, an applicant may request to review the documents used and created by the registrar, registration committee or competence committee when considering their application. This means that CARNA should be in a position to be able to provide applicants with their ARNAP reports or summaries of the ARNAP results not just for reasons related to fairness, but also to comply with the legislation.

Recommendation #7: We recommend that CARNA provide applicants with their ARNAP reports or summaries of their ARNAP results.

g) Is the process completed in a timely manner?

The amount of time that it takes to complete the IEN registration process depends on a number of factors and is highly variable.

For example, in the case of an IEN who is immediately deemed to be eligible to receive a temporary permit to practice while they proceed to the next steps of writing the NCLEX and working to fulfill the reference requirement, the amount of time that passes between the date that they complete their application and the date that they are added to the temporary register (or even the general register), will be relatively short.

On the other end of the spectrum, in the case of an IEN who must take the ARNAP and the full BCN Program, the amount of time that passes between the date that they complete their application and the date that they are added to the temporary register will likely be tremendous. In fact, the reality is that it may take years.

The biggest sources of delay here come from the ARNAP and the BCN Program. The ARNAP and the BCN Program also create a number of other concerns related to accessibility. As such, the delay associated with the ARNAP and the BCN Program will be discussed below under the criteria of whether the IEN registration process is accessible.

Separate from the delays associated with the ARNAP and the BCN Program, a number of other timeliness concerns exist in respect of the IEN registration process.

We understand that the initial decision concerning whether an applicant is ineligible, eligible or must take the ARNAP, is generally made quite quickly. We do not have any concerns about the timeliness of this step.

However, we understand that there can sometimes be a sizable delay between when the nurse consultants receive an applicant's ARNAP report and when the applicant receives the decision concerning whether they are ineligible, eligible or must complete bridging education.

Part of the reason for this is that, as mentioned above, the ARNAP report contains raw data that the nurse consultant must analyze and interpret. This obviously takes time. We further understand that this delay may be exacerbated if the IEN took the June offering of the ARNAP because this means that, by the time that CARNA receives the ARNAP report from Touchstone, CARNA is in the middle of processing members' applications for renewal of their registration. CARNA has apparently asked Touchstone about the possibility of moving the June ARNAP. However, Touchstone apparently responded that it is unable to accommodate this request due to constraints on facility availability (the ARNAP must be provided when college and university courses are not in session so that Touchstone can use those spaces).

We recommend that CARNA initiate a discussion with Touchstone about the form and content of the ARNAP reports. More specifically, the nurse consultants should consider what changes Touchstone could make in order for the ARNAP reports to be more immediately useful and understandable for them (and for applicants in respect of the above recommendation that applicants be provided with their ARNAP results). We also suggest that CARNA revisit with Touchstone whether there can be any flexibility about when the ARNAP is offered or when CARNA receives the ARNAP reports.

Recommendation #8: We recommend that CARNA initiate a discussion with Touchstone about the form and content of the ARNAP reports and whether the ARNAP can be offered at a different time.

Since there are concerns about the length of time that it takes to complete the IEN registration process, we also recommend more generally that CARNA evaluate the entire IEN registration process to determine whether any of the steps in the process can be removed. It goes without saying that the less steps that there are in the process, the less time that it should take to complete the process.

If CARNA concludes that every one of the steps is necessary, CARNA should then consider whether any of the steps can be modified or abbreviated.

One option here might be to allow for more than one step to be completed at a time. For example, the process currently contemplates that an applicant cannot create a MyCARNA account until they receive their advisory report from NNAS. However, some delay in the system may be avoided if an applicant can apply to CARNA when they apply to NNAS. The applicant could also be given the opportunity to complete the currency of registered nursing practice hours update and the documentation of registered nursing experience/practice forms at this time as well.

Recommendation #9: We recommend that CARNA evaluate the entire IEN registration process to determine whether any of the steps in the process can be removed or modified so that the process can be completed more quickly.

h) Are IENs treated similarly to other types of applicants?

There are a number of significant differences between IENs and other types of applicants. As such, it is not surprising that IENs might be treated somewhat differently. For example, IENs are required to take a number of steps and fulfill a number of requirements that other types of applicants are not. This in and of itself does not necessarily mean that the IEN registration process is unfair.

However, there is one significant difference in how IENs are treated as compared to other types of applicants that gives us concern. As outlined above, towards the end of the IEN registration process, an IEN is required to submit an application for temporary registration so that they can obtain satisfactory Alberta employer references to meet the good character requirement.

This step of needing to apply for temporary registration to obtain satisfactory Alberta employer references does not exist in respect of applicants who are recent graduates from approved entry-level nursing education programs in Canada. These applicants are immediately eligible to apply for registration as registered nurses as soon as they pass the NCLEX.

We understand that part of the reason that IENs are required to obtain temporary permits and satisfactory Alberta employer references while other types of applicants are not is because completion of a nursing education program in Canada essentially leads to a presumption of good character. Since IENs have not completed a nursing education in Canada, their good character is not presumed. This means that they must provide evidence of their good character, which they must do by obtaining satisfactory Alberta employer references.

If this is in fact the rationale behind the differential treatment, CARNA should consider whether it is defensible for it to presume good character in the case of applicants who have completed their nursing education programs in Canada but not in the case of IENs. CARNA should also consider whether this requirement is necessary or if there might be other ways for IENs to establish their good character which are less disadvantageous to them.

Recommendation #10: We recommend that CARNA consider why IENs are required to apply for temporary registration to obtain satisfactory Alberta employer references after passing the NCLEX while other applicants are not and also that CARNA consider whether this requirement is necessary.

3) Is the IEN registration process accessible?

The most significant concern identified in this review relates to accessibility.

The biggest points of inaccessibility in the IEN registration process are the ARNAP and the BCN Program. Of specific note:

- an applicant will have to pay \$1,900 to take the ARNAP;
- an applicant may have to wait up to six months to take the ARNAP (this is because the ARNAP is only offered every six months, and so if the applicant just missed it, they will have to wait six months for the next time that the ARNAP is offered);

- an applicant may have to travel to take the ARNAP (this is because the ARNAP is only offered in Calgary and Edmonton, and so if the applicant is from outside either of those cities, they will have to travel to Calgary or Edmonton);
- an applicant may have to pay up to \$5,300 to take the BCN Program (the cost may be less if the applicant is only required to complete part of the BCN Program);
- an applicant may have to (or is likely to) wait 12-18 months to take the BCN Program (this is because the BCN Program currently only accepts a limited number of students a year and so there is a long waiting list for it); and
- an applicant may have to move to take the BCN Program (while the courses can be completed by distance, the clinical component must be completed in Calgary).

The impact of these hurdles is increased when they are considered in the context of the IEN registration process as a whole. This is because the time, money and inconvenience quickly compound. Consider the following:

Time waiting for the NNAS report	Up to 12 months
Time waiting to take the ARNAP	Up to 6 months
Time waiting to start the BCN Program	12 – 18 months
Time in the BCN Program	8 – 15 months
Time practicing with a temporary permit in order to obtain satisfactory Alberta employer references	6 months or more

The financial investment is also significant:

Cost of taking an approved English language test	\$310-\$395
Cost of apply to NNAS	\$650 (US)
Cost of applying to CARNA	\$169
Cost of taking the ARNAP	\$1,900
Cost of taking the BCN Program	\$5,300
Cost of taking the NCLEX	\$360

Additional costs are also likely or easily contemplated for things like:

- obtaining official transcripts and other documents;
- traveling to take the ARNAP;
- traveling to take the BCN Program;
- having to take the NCLEX more than once; and
- having to take a second English language test (because the results of the first one are no longer current at the time of registration).

In short, the IEN registration process is one that could potentially cost close to \$10,000 and take over four years.

We wish to emphasize here that, at least some of this additional time and money may be completely justified. Some IENs may not have the education, skills and/or experience needed to be an RN in Alberta. In these instances, the added investments of time and money make sense.

We also recognize that when it comes to the ARNAP and the BCN Program, CARNA may be limited in its ability to control things like wait times and fees. However, as mentioned above, responsibility here still lies with CARNA and so it falls to CARNA to take whatever steps it can to fix any shortcomings. With this

in mind, we recommend that CARNA very seriously look for ways to alleviate the time, money and inconvenience associated with the ARNAP and the BCN Program.

Possible things to consider here may include the following:

- consider using another service provider;
- working with Touchstone to increase the focus and applicability of the ARNAP to better suit CARNA's needs;
- working with Touchstone to reduce the cost;
- engaging a third party to assist with administering the ARNAP so that it can be offered more frequently and in more areas;
- working with Mount Royal University to brainstorm or determine ways to reduce the wait list for the BCN Program;
- seeking increased funding for bridging education programs from the Government;
- recognizing bridging education programs from outside of the Province as approved education programs; and
- recognizing certain education programs from other jurisdictions as approved education programs.

Recommendation #11: We recommend that CARNA consider and examine ways in which the ARNAP and the BCN Program may be modified in order to reduce the time, money and inconvenience associated with these steps.

Separate from the accessibility concerns which stem from the ARNAP and the BCN Program, we are also concerned, as alluded to above, that the charge for a review of a decision is so high that it effectively dissuades or prevents applicants from exercising their rights to reviews. We recommend that CARNA re-evaluate the fee and consider lowering it.

Pursuant to section 32(2)(c) of the *Act*, council may make any further order that it considers necessary on review. We also highlight here that if an applicant is successful in their application for a review, the fee should be refunded to them.

Recommendation #12: We recommend that CARNA re-evaluate the fee that it charges for a review of a decision and consider lowering it from \$2,500.

- 4) **Does the IEN registration process ensure that only those applicants who meet the requirements become registered nurses? Does it provide sufficient protection for the public?**

As mentioned above, in order to fulfill its mandate to protect the public, CARNA is required to ensure that only those applicants who are competent to engage in registered nursing are granted registration.

To this end, the IEN registration process includes a number of steps and assessments, which may (or must) include:

- demonstration of proficiency in the English language;
- preliminary evaluation of an applicant's education by NNAS;
- the ARNAP;
- the BCN Program;
- the application of the Checklist coming from the LFE project; and
- the NCLEX.

Based on the feedback that we received during our interviews and other conversations, we understand that there is not a significant concern that IENs are being registered with CARNA when they shouldn't be. In fact, we understand that, if anything, the concern goes in the opposite direction (that is, IENs are not being registered with CARNA when they should be or as quickly and efficiently as they should be).

Having said this, we also understand that there is a concern that some of the steps or assessments are not as useful as they could be. More specifically, the concern was raised that the ARNAP is not "hard" enough, meaning that the ARNAP deems applicants to be more competent to practice as registered nurses in Alberta than they actually are. The primary concern raised here was that the OSCE stations only test for less complex and difficult competencies.

This concern about the ARNAP does not mean that applicants who are not competent to engage in registered nursing are being granted registration. This is because the ARNAP is used to determine whether an applicant will be required to complete bridging education (as opposed to whether the applicant will be immediately registered). Additionally, a number of other safeguards or checks and balances occur in the IEN registration process after completion of the ARNAP (most notably, the applicant must still pass the NCLEX before being registered).

However, even if the fact that the ARNAP is not hard enough does not directly lead to applicants being registered when they shouldn't be, CARNA should still consider how effectively the ARNAP measures CARNA's entry to practice competencies. We recommend that CARNA engage in a discussion with Touchstone about whether and how the ARNAP can be modified to better suit CARNA's needs.

Recommendation #13: We recommend that CARNA engage in a discussion with Touchstone about whether and how the ARNAP can be modified to better suit CARNA's needs.

5) Is the IEN registration process consistent with the principles established in applicable trade agreements?

It is important to be clear about what CARNA's obligations are when it comes to trade agreements and the IEN registration process.

As mentioned above, the labour mobility provisions of the CFTA (Chapter 7) state that certified workers have to be recognized as qualified to work by a regulatory body in another province or territory which regulates that occupation, without having to go through significant additional training, work experience, examination or assessment, unless an exception has been posted. The CFTA and the NWPTA also

establish the need for provincial regulators to reconcile regulatory differences, to the extent possible, in order to facilitate the free movement of professionals across Canada. At the same time, the CFTA and the NWPTA also acknowledge that the primary role of regulatory bodies is to set the standards necessary to ensure public safety, consumer protection and the integrity of the profession (see Article 705 of the CFTA). Trade agreements must not undermine this fundamental mandate of regulatory bodies.

Of tremendous importance, these obligations only arise once an individual is registered with the nursing regulatory body in another Canadian province or territory.

Since neither the CFTA nor the NWPTA impose any obligations on CARNA in respect of IENs who are not already registered in another jurisdiction in Canada, they do not obligate CARNA to use a similar registration process for IENs as those used by nursing regulatory bodies in other Canadian jurisdictions. In other words, CARNA is at liberty to impose various requirements on applicants as part of the IEN registration process even if no other nursing regulatory body in Canada imposes those requirements on applicants in their own IEN registration processes.

However, once an IEN is registered with another nursing regulatory body in Canada, the CFTA and the NWPTA more or less obligate CARNA to register them (subject to limited exceptions) and CARNA cannot require the IEN to undergo any additional material requirements such as having their qualifications reassessed, doing more training, gaining additional work experience or taking further exams.

We understand that CARNA has received anecdotal reports that its IEN registration process is one of the most difficult or onerous processes when compared to the other Canadian jurisdictions. As a result of this, CARNA is somewhat concerned that IENs may be obtaining registration as RNs in other provinces and territories, with no intention of ever actually practicing there, solely to avoid the IEN registration process in Alberta. The fact that this may be happening raises two main concerns:

- that IENs who are not competent to engage in registered nursing in Alberta are being granted registration with CARNA through this “back door”; and
- that the IEN registration process in Alberta is so difficult, onerous or slow that it’s more desirable to go through the effort of getting registered in another jurisdiction first.

The second concern relates closely to the issues discussed above relating to timeliness and accessibility and we are hopeful that the adoption of some or all of our recommendations set out above will help to address this concern.

Turning back to the first concern, there is very little that can be done at this time to directly address and confront it. The requirements of the CFTA and the NWPTA are very clear: Once an IEN is registered with another nursing regulatory body in Canada, CARNA is more or less obligated to register them.

The only exception here is if an exception has been posted. With this in mind, CARNA could apply for an exception so that it could impose its own training, work experience, examination or assessment requirements on IENs even when those IENs are already registered in other Canadian jurisdictions. However, exceptions are typically only given when there is a significant difference across jurisdictions in the activities required to perform an occupation. Differences in certification pathways, including IEN registration processes, alone will not provide a basis for an exception or non-recognition. Rather, exceptions will only be granted if there is strong supporting evidence of an actual material deficiency in

the skills, knowledge or ability required for practice. This means that, before CARNA could get an exception, it would have to collect evidence to show that IENs registered in other Canadian provinces are not competent to practice in Alberta.

We recommend that CARNA consider how significant the concern is that IENs who are not competent to engage in registered nursing in Alberta are being granted registration with CARNA after becoming registered with regulatory bodies in other Canadian jurisdictions even when they have no intention of ever actually practicing there. We suggest that CARNA start by collecting data to determine how often this is actually happening.

If this is something that appears to be happening very frequently, it may require CARNA's further attention. On the other hand, if it is something that only appears to be happening infrequently, we recommend that CARNA instead focus its efforts on improving the IEN registration process so that this becomes a less desirable option for applicants (that is, they would rather complete the IEN registration process in Alberta than complete it somewhere else and then seek registration in Alberta as an applicant from an equivalent jurisdiction).

Recommendation #14: We recommend that CARNA consider how significant the concern is that IENs who are not competent to engage in registered nursing in Alberta are being granted registration with CARNA after becoming registered with regulatory bodies in other Canadian jurisdictions even when they have no intention of ever actually practicing there.

6) Is there a mechanism in place for CARNA to assess its criteria and the IEN registration process on a continuous basis?

We considered whether CARNA has mechanisms in place to review and consider possible changes to the IEN registration process. We are concerned that there is no mechanism in place for CARNA to assess the IEN registration process on a continuous basis.

Without this type of mechanism, it may be difficult for CARNA to identify issues, trends and themes at the earliest possible opportunity. It also makes it difficult for CARNA to demonstrate that issues have been worked on and to measure improvement.

We recommend that CARNA, to the extent that it does not already do so, immediately start collecting and tracking data concerning IEN applications, including the following:

	Per year
Total number of applications (of all types) for initial registration:	
Total number of applications from IENs for initial registration:	
Total number of IENs immediately deemed to be ineligible:	
Total number of IENs immediately deemed to be eligible:	
Total number of IENs required to complete the ARNAP:	
Total number of IENs required to complete the ARNAP <u>or</u> proceed immediately to the BCN Program:	
Total number of IENs immediately deemed to be ineligible following the	

ARNAP:	
Total number of IENs immediately deemed to eligible following the ARNAP:	
Total number of IENs required to complete some bridging education following the ARNAP:	
Total number of IENs required to complete the entire BCN Program following the ARNAP:	
Total number of IENs required to complete the BCN program (whether following the ARNAP or immediately after initial assessment):	
Total number of IENs accepted into BCN Program:	
Total number of IENs successfully completing BCN Program:	
Total number of IENs failing the BCN Program:	
Total number of IENs dropping out of the BCN Program:	
Total number of IENs taking NCLEX:	
Total number of IENs passing the NCLEX:	
Total number of IENs failing the NCLEX:	
Total number of IENs receiving temporary registration:	
Total number of IENs receiving initial registration:	

In addition, we recommend that CARNA track the amount of time that the process takes for each applicant. This includes the amount of time that passes between each individual step, but also the amount of time that passes between when the applicant first applies and when the applicant is finally registered as an RN. For example:

	Date	Period of time since last step	Period of time since first step
Application to NNAS			
Report received from NNAS			
Application to CARNA			
Initial decision on registration			
ARNAP completed			
ARNAP results received from Touchstone			
Subsequent decision on registration			
Application for BCN Program			
Admission to BCN Program			
Completion of BCN Program			
Application for NCLEX			
Completion of NCLEX			
Application for temporary registration			
Decision on temporary registration			
Alberta employer references received			
Decision on RN registration			

We further recommend that this data be reproduced in a report to the Registrar on a regular basis. At the beginning, this may be every three or four months. However, as more data is collected, reports could slow to an annual basis.

Recommendation #15: We recommend that CARNA, if it does not already do so, start collecting and tracking data on IEN applications.

Conclusion

CARNA is fortunate to have skilled executive and administrative staff that are committed to creating and implementing an IEN registration process that is compliant with the legislation; is fair; is accessible; and offers adequate protection to the public. The recommendations outlined above are intended to ensure these things. CARNA's willingness to engage in an in-depth review and to consider these potential recommendations reflects a deep commitment to excellence in regulation and we commend CARNA for this.

Appendix A

- Recommendation #1:** We recommend that CARNA update the webpage to further clarify the IEN registration process and provide some additional information about the time and cost associated with various steps in the process and the process as a whole.
- Recommendation #2:** We recommend that CARNA prepare some additional resources on the IEN registration process, such as a flowchart and a brochure or pamphlet.
- Recommendation #3:** We recommend that the Checklist be re-evaluated and updated.
- Recommendation #4:** We recommend that CARNA re-evaluate and likely remove the rule which provides that applicants may only take the ARNAP once.
- Recommendation #5:** We recommend that CARNA disclose much of the information included in the Checklist to applicants.
- Recommendation #6:** We recommend that CARNA provide applicants with more information about how decisions were reached or the reasons for the decisions in the letters that it provides to applicants.
- Recommendation #7:** We recommend that CARNA provide applicants with their ARNAP reports or summaries of their ARNAP results.
- Recommendation #8:** We recommend that CARNA initiate a discussion with Touchstone about the form and content of the ARNAP reports and whether the ARNAP can be offered at a different time.
- Recommendation #9:** We recommend that CARNA evaluate the entire IEN registration process to determine whether any of the steps in the process can be removed or modified so that the process can be completed more quickly.
- Recommendation #10:** We recommend that CARNA consider why IENs are required to apply for temporary registration to obtain satisfactory Alberta employer references after passing the NCLEX while other applicants are not and also that CARNA consider whether this requirement is necessary.
- Recommendation #11:** We recommend that CARNA consider and examine ways in which the ARNAP and the BCN Program may be modified in order to reduce the time, money and inconvenience associated with these steps.
- Recommendation #12:** We recommend that CARNA re-evaluate the fee that it charges for a review of a decision and consider lowering it from \$2,500.
- Recommendation #13:** We recommend CARNA engage in a discussion with Touchstone about whether and how the ARNAP can be modified to better suit CARNA's needs.

Recommendation #14: We recommend that CARNA consider how significant the concern is that IENs who are not competent to engage in registered nursing in Alberta are being granted registration with CARNA after becoming registered with regulatory bodies in other Canadian jurisdictions even when they have no intention of ever actually practicing there.

Recommendation #15: We recommend that CARNA, if it does not already do so, start collecting and tracking data on IEN applications.