Registration Data Report

Manitoba Chiropractors Association

Fair Registration Practices Office

Manitoba

Contents

Executive Summary

This report presents registration data of the Manitoba Chiropractors Association (MCA) from 2011 to 2021. The Fair Registration Practices Office (FRPO) issues this report as part of the office's mandate and oversight responsibility under The Fair Registration Practices in Regulated Professions Act. Its purpose is to provide a statistical picture of application, assessment and registration outcomes for internationally educated applicants to MCA over the last eleven years.

From 2011 to 2021, MCA's registration data indicates 70 internationally educated chiropractors applied. Almost all of these applicants, 97 per cent, were educated in the United States. With no recognized academic training programs in Manitoba and only two in Canada, many applicants to MCA are Canadians that have trained in the United States.

From 2012 to 2020, MCA received 43 domestic applicants (DAs).

Ninety-nine per cent (69/70) of IEAs who applied to MCA from 2011 to 2021 registered in this period. One IEA applicant received provisional registration under a temporary license. The registration rate for DAs was 100 per cent.

Median time for IEAs to register was just over a year (1.1). Most of the time taken to register occurred completing the first-step, Canadian Chiropractors Examining Board (CCEB) exams. MCA registration timelines are short, about 1 month.

Regarding IEA trends in applications, outcomes and timelines, applications remained relatively steady throughout the reporting period. No significant trends regarding timelines or registration outcomes can be seen in the data.

The quality of registration data provided by MCA for the 2011 to 2021 period is strong. IEA outcomes and timelines are presented throughout the assessment and registration process. Currently, however, with regard to outcomes the data is somewhat incomplete. Applicants intending to apply to MCA, but who are unsuccessful with the first-step, CCEB exam process are not recorded. Without a sense of CCEB through rates, the statistical picture is incomplete.

CCEB through rate data may be unavailable. However, MCA has provided a referral so FRPO may discuss the matter with CCEB.

FRPO is grateful to MCA for their work with the office over this 11-year period and their commitment to continuously improving data reporting.

Glossary of Terms

This glossary defines key terms used throughout the report to help ensure understanding of the findings presented. For consistency, certain terms are used across professions even though regulators may use other operational terms. For example, 'provisional registration' is used in reference to any temporary or conditional registration that enables some form of practice or title representation. Manitoba regulators use a variety of terms ('member-in-training', 'graduate nurse', 'exam candidate', 'intern', etc.) that signify different types of provisional registration.

Domestic Applicant (DA)
An individual with Canadian education, or current Canadian registration, applying for registration with a Manitoba regulator. With regard to labour mobility applicants, this may include internationally educated applicants.

Internationally Educated Applicant (IEA)
An individual educated outside of Canada applying for registration with a Manitoba regulator. This may include Canadians educated outside of Canada.

National Occupational Classification Number (NOC #)
The federal government's system of classifying and describing the occupations in the Canadian economy. In this report, NOC numbers are used in the presentation of immigration data. When an individual applies to immigrate to Canada, they self-identify by NOC number. Some professions have a unique NOC assigned to them, while others share a NOC with one or more other professions. Where this is the case, it is outlined in the report.

Provisional Registration
Temporary or conditional registration that enables some form of practice or title representation. In some professions, this is granted to applicants who substantially meet a regulator's registration requirements, allowing them to complete a period of approved supervised practice. Not all Manitoba regulators offer provisional registration and terms used vary.

Provisionally Registered Applicant
An applicant who successfully completes the requirements to be granted a temporary or conditional registration.

Registration
The licensing or certification process whereby applicants acquire legally sanctioned professional recognition with the authority to practise and/or use a designated protected title within a jurisdiction.

Registered Applicant
An applicant who successfully completes the licensing or certification process, meeting all requirements necessary to be entered onto a register of members maintained by a regulatory body.

Completed Application

An application for which all documents and fees needed for an initial assessment decision are submitted. The completed application date marks the start of an applicant's registration process. This may occur with the Manitoba regulator or a national third-party responsible for the first stages of the assessment process. Additional requirements and documents may be needed at later stages of the assessment and registration process.

Applicant File (Internationally Educated Applicants)

When an individual applies to a Manitoba regulator, a file is opened and data specific to that individual is collected on key steps in the profession's registration process. Each IEA has one 'applicant file' regardless of the number of times they apply or the number of years their file is in process.

Closed File

An applicant file that is no longer active. When an applicant is no longer pursing the registration process - they have either withdrawn from the process or have been deemed ineligible to pursue or continue to pursue the process - their file is 'closed'.

This term is <u>not</u> used to refer to files of applicants who have been registered.

Withdrawal

A reason provided for a closed file. Applicants who stop pursing registration despite eligibility to continue are considered 'withdrawals'.

Denial

A reason provided for a closed file. Applicants who are deemed ineligible (or who are not approved) to pursue, or to continue to pursue registration, are considered 'denials'.

Resolved File

An applicant file that is no longer active. A file is considered 'resolved' when the applicant has withdrawn from the process, been denied or been registered.

In Process (Unresolved) File

An applicant file that is active. The file remains open while the applicant is considered to be pursing the registration process. 'In process' applicants may or may not be provisionally registered.

Initial Assessment

The decision made upon review of documents and other requirements submitted at application. The initial assessment is conducted either by the Manitoba regulator or by a designated third-party assessor. In most cases, this initial assessment determines whether an applicant is eligible (or approved) to pursue the registration process.

Pre-Arrival

Before immigrating to Canada.

Post-Arrival

After immigrating to Canada.

Registration Timelines

The time it takes an applicant to complete the registration process. The start of the process is marked by the date of submission of a completed application to either the Manitoba regulator or the regulator's designated third-party assessor and the end of the process is marked by the date of provisional registration or registration.

Registration Rates and Ratios

For professions with IEAs still in process at the end of the reporting period, determining a precise registration rate is not possible. Where this is the case, the IEA registration rate among resolved files (closed and registered) and registration to application ratios are provided as *indicators* of a profession's registration rate. As individual data is not collected, only registration to application ratios can be provided for DAs.

Registration Rate

Percentage of applicants who apply in a given period and go on to register.

Resolved Registration Rate

Number of registrations
÷
Number of complete resolved files in a given year or period

Registration to Application Ratio

Number of registrations
÷
Number of complete applications in a given year or period

Late period Registration to Application Ratio

Number of registrations, 2016-2020, of individuals applying between 2011-2021
÷
Number of complete applications made between 2016 and 2020

Introduction

The Fair Registration Practices Office's (FPRO) registration data report on the Manitoba Chiropractors Association (MCA) is issued under FRPO's responsibility under section 14(2b) of The Fair Registration Practices in Regulated Professions Amendment Act (Act) to conduct research and analysis regarding the registration of internationally educated applicants (IEAs).

MCA supplies registration data to the FRPO (formerly the Office of the Manitoba Fairness Commissioner) as an obligation under The Fair Registration Practices in Regulated Professions Amendment Act (sec. 15(2)). Each year, MCA provides records on the key steps in the assessment and registration process for IEAs, and less detailed, aggregate application and outcome information for domestic applicants (DAs). MCA, and the other regulated professions under Manitoba's fairness legislation, have been providing IEA data since 2011; DA data has been supplied since 2012.

This report presents 2011 to 2021 assessment and registration data for IEAs on applications, timelines and trends, together with aggregate DA data.

Facts and figures in this report are accompanied by analysis and contextual remarks to help make sense of the data and provide a coherent, statistical picture. Values less than five and that raise privacy concerns are redacted throughout this report and indicated by the '■' symbol. A process map and step-by-step overview of the assessment and registration process precedes the data presentation.

The report is restricted to developing a fact-based, statistical picture. There is no discussion of fairness issues or matters of compliance to fairness duties under the Act. An evaluation of the quality of data collection is provided and where it is incomplete, opportunities for improvement are identified.

Overview of Assessment and Registration Process

The following section provides a step-by-step overview of MCA's assessment and registration process. It is intended to give the reader an understanding of the key requirements and the order of the process to help make sense of the registration data. This information is current as of May 2022. However, complete information is not provided, and policies and fees are subject to change. Visit the Manitoba Chiropractors Association for detailed information.

Legislation

MCA licenses and regulates the practice of chiropractic in Manitoba under the authority of The Chiropractic Act (C.C.S.M. c. C100) and Regulations (66/86 and 100/2008). In order to practice chiropractic in Manitoba, and use the title Chiropractor (Doctor of Chiropractic: D.C.), individuals must be registered and have a valid certificate to practice with MCA.

Qualification Requirements

Principal qualifications required for licensure as a chiropractor include possessing a Doctorate of Chiropractic from an academic program accredited by the Canadian Federation of Chiropractic Regulatory and Educational Accrediting Boards or from an academic program judged equivalent by a provincial regulator. Applicants must also pass national exams administered by the Canadian Chiropractic Examining Board (CCEB) and a provincial jurisprudence exam.

Steps to Registration

Step 1: Canadian Chiropractic Examining Board Certification

Applicants first need certification by the CCEB. This involves applying and successfully completing exams. To qualify to write the exams, applicants must have trained in accredited academic programs from jurisdictions with membership in the Council on Chiropractic Education International.

CCEB exams are offered three times a year at select locations in Canada and a few locations internationally. Currently there are no exam sites in Manitoba.

CCEB requires applicants to supply:

- professional passport-type photograph
- transcripts submitted directly from the applicant's educational institution. An eligibility letter from the institution may allow soon–to-be graduates to write and conditionally certify before graduation
- if applicable, a letter of eligibility from a provincial regulator
- exam and administration fees up to $3,305 (all three exams)

CCEB has three exams that test for minimal competency to enter chiropractic practice in Canada:

Component A — basic and applied sciences
Component B — clinical decision-making and diagnostic imaging
Component C — clinical skills evaluation

Component A tests basic chiropractic knowledge, while Component B tests the application of that knowledge to clinical situations. Both tests use multiple-choice questions. Component C is an "observed structured clinical encounter" focused on application of the candidate's clinical skills.

Candidates with over three years of work experience in a regulated practice environment may be exempt from taking Component A.

Step 2: Apply to the Manitoba Chiropractors Association

Upon CCEB certification, applicants apply for registration with the MCA. The following documentation is required:

- transcripts from an accredited Doctor of Chiropractic educational program
- government issued photo identification
- confirmation from CCEB of successful completion of Parts A, B, and C (CCEB certificate)
- completion of MCA's Initial License Application and Declarations
- if applicable, Letter of Good Standing from current jurisdiction of practice
- criminal reference check and vulnerable sector search for the applicant's time in Canada
- application fee: $325

Applicants must then write MCA's provincial jurisprudence examination. This is a formative exam assessing knowledge and familiarity with governing legislation, By-Laws and Standards of Practice. The exam is not open book, nor is it pass/fail. Candidates complete the exam and MCA staff immediately review and discuss with the candidate; resource information is provided to the candidate for any areas requiring clarification.

Step 3: Registration

Upon completion of the above requirements, to register applicants provide MCA:

- confirmation as to when their practice will commence
- payment of MCA's $3,200 membership dues
- documentation of malpractice liability coverage with minimum coverage of $2 million per claim ($4 million aggregate per year). Cost range is from $1,200 to 2,500 (2017). Members of the Canadian Chiropractic Association can obtain a group insurance rate through a Canadian Chiropractic Protective Association program.

Registration Time and Costs

All internationally educated chiropractors must complete an assessment and national exams. MCA reports that the steps in their registration process can be completed within approximately 12 months. The median time to registration for IEAs from 2011 to 2021 was 1.1 years. Timelines to registration are also dependant upon the applicant, and reasons for extended timelines vary as much as each individual's circumstance – initial settlement, family, financial pressures, etc. all impact the process on an individual basis.

The cost for internationally educated chiropractors to be assessed and register with the MCA may vary somewhat depending on the circumstance of the applicant. Basic costs total approximately $8,500. There may also be costs associated with providing documentation, exam preparation and travel costs.
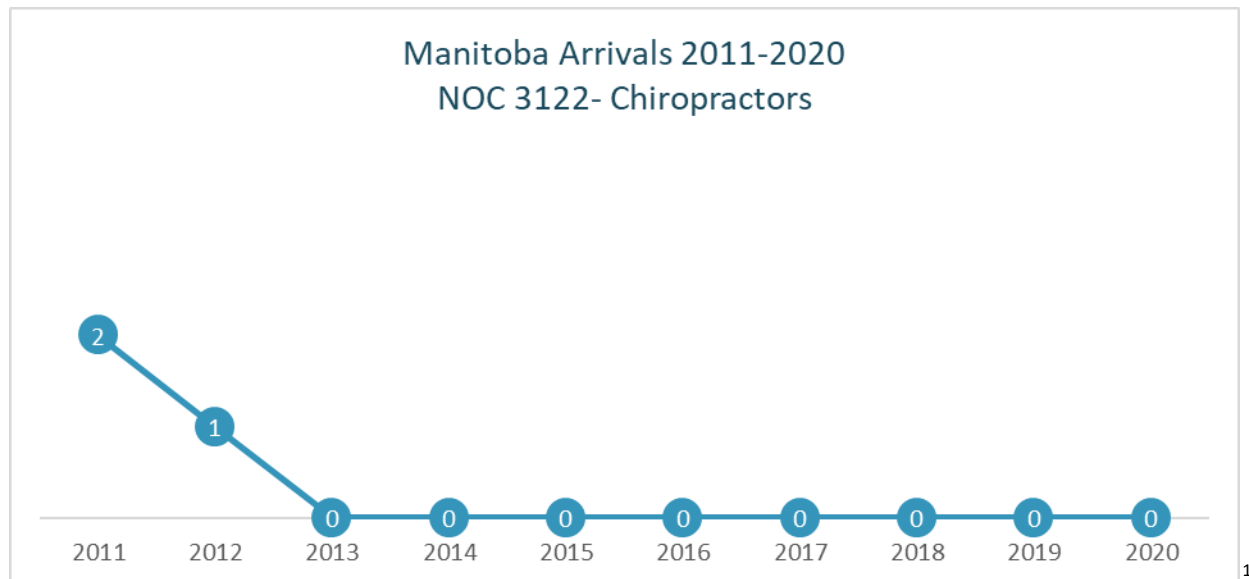
Registration Process Map
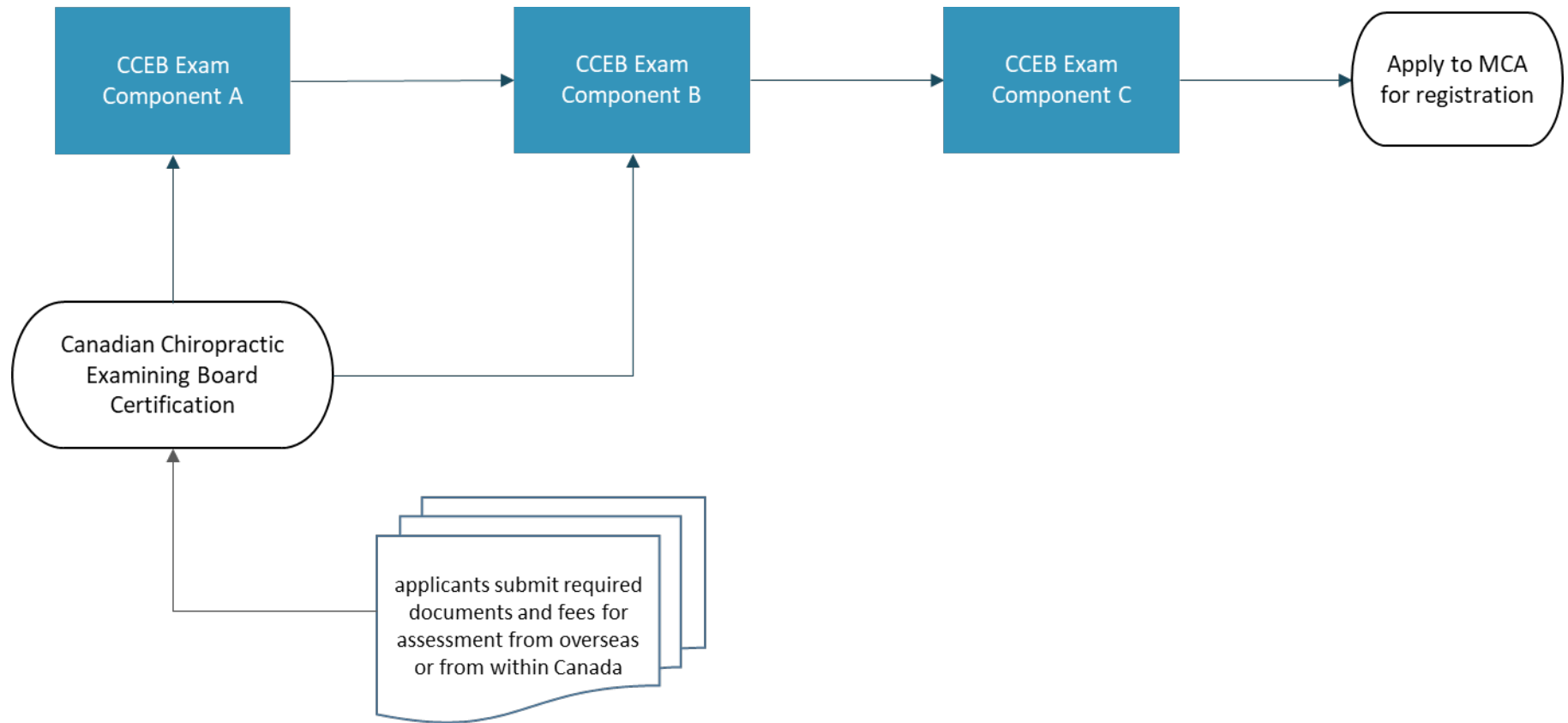
Immigration Statistics

The National Occupational Classification (NOC) is Canada's national system of classifying and describing the occupations in the Canadian economy. Over 30,000 occupation titles are organised by unit groups, skill levels and skill types. When individuals apply to immigrate to Canada, they are asked to identify their NOC code. This code is used to classify arrivals by their identified occupation.

Immigration statistics can be a helpful indicator of the number of internationally educated professionals arriving in Canadian provinces. However, they are somewhat limited because applicants self-declare their NOC (little verification), only principal applicants are counted (not all immigrants) and NOCs do not always align directly with a profession (some codes apply to several professions and some professions can fall under several different codes).

There were three Manitoba arrivals in the 2011 to 2020 period who self-declared with NOC 3122 used to identify Chiropractors.

Numbers are small with arrivals occurring early in the reporting period.

Manitoba Arrivals 2011-2020
NOC 3122- Chiropractors

2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
2	1	0	0	0	0	0	0	0	0

[1]

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[1] Source: Created December 2021 by the Government of Manitoba using IRCC Q4 2020 immigration data.

Context – Reading the Numbers

In Canada, the doctorate level academic training for chiropractors is similar to that in the United States, Australia, and many jurisdictions in Europe. Approved chiropractic programs in these jurisdictions hold membership with the Council on Chiropractic Education International. Graduates of recognized programs qualify to write CCEB national exams. Currently, there are two recognized programs in Canada, 17 in the United States and 20 other international programs (mostly in Europe).

Individuals trained in academic programs outside of these recognized programs will not qualify for CCEB certification.

Most applicants to the Manitoba Chiropractors Association (MCA) are IEAs. This is likely due to the absence of an academic training program in Manitoba and only two recognized programs in Canada. Many of MCA's IEAs are Canadians who trained in the United States.

All applicants to MCA must first apply, write exams, and be certified by CCEB. Registration data collected from MCA does not contain through rate data for this first step. Assessment and registration data presented in this report is restricted to capturing those applicants who successfully certify with CCEB.

Registration Data

Applications 2011 to 2021

IEA and DA applications by year
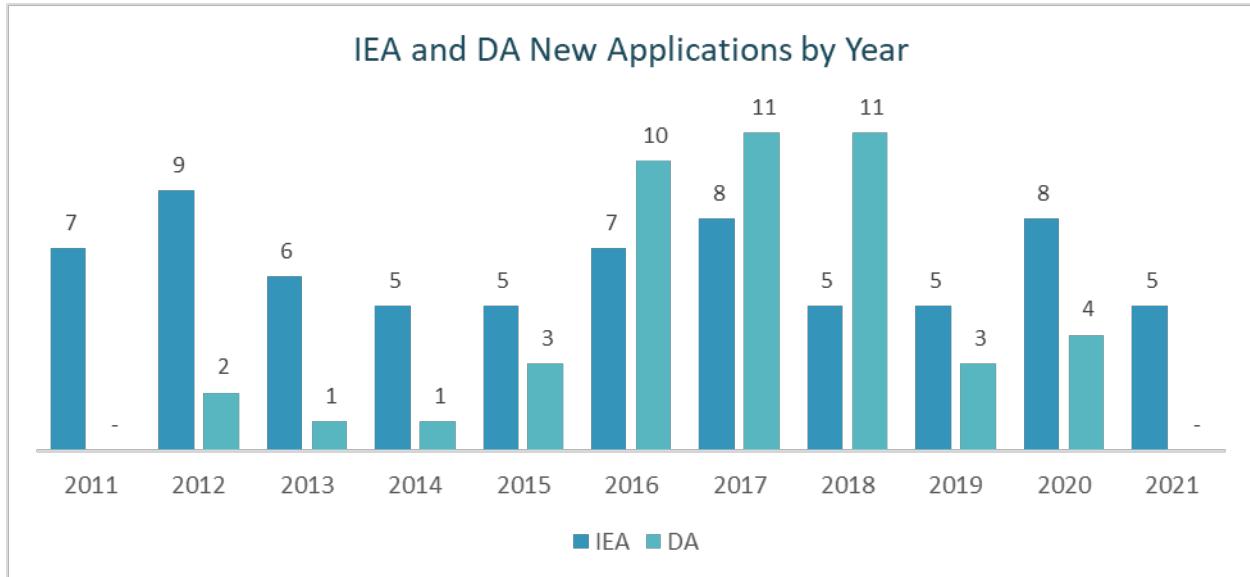
From 2011 to 2021, 43 applicants to MCA were domestically educated and 70 were internationally educated.

Over the reporting period, significantly more IEAs than DAs made application to MCA. This is likely due to the absence of an academic training program in Manitoba and only two recognized programs in Canada. Many IEAs received by MCA are Canadians who trained in the United States, where there are 17 recognized programs.

IEA applications to the college have remained relatively stable over the reporting period. Note that DEA data was not collected from Manitoba regulators until 2012.

IEA complete applications

IEA Applications 2011-2021	
Number of Applications	Complete Applications
70	70

Complete applications refers to those for which all documents and fees necessary to conduct MCA's assessment are provided. In MCA's case, all 70 IEA applications were complete; there were no partial or incomplete applications.

IEA applications and country of education

Top Country of Education by Number of Applications 2011-2021		
Rank	Country of Education	Number of Applicants
1	United States	68

Among MCA IEAs, 97 per cent (68/70) were educated in the United States.

Registration Outcomes 2011 to 2021

IEA applications and registrations

IEA Applications and Registrations 2011-2021

| Applications | Registrations | Provisional Registrations | Combined Registrations |
| 70 | 69 | 1 | 70 |

Legend: ■ Completed Applications ■ Incomplete Applications ■ Registrations ■ Provisional Registrations ■ Combined Registrations
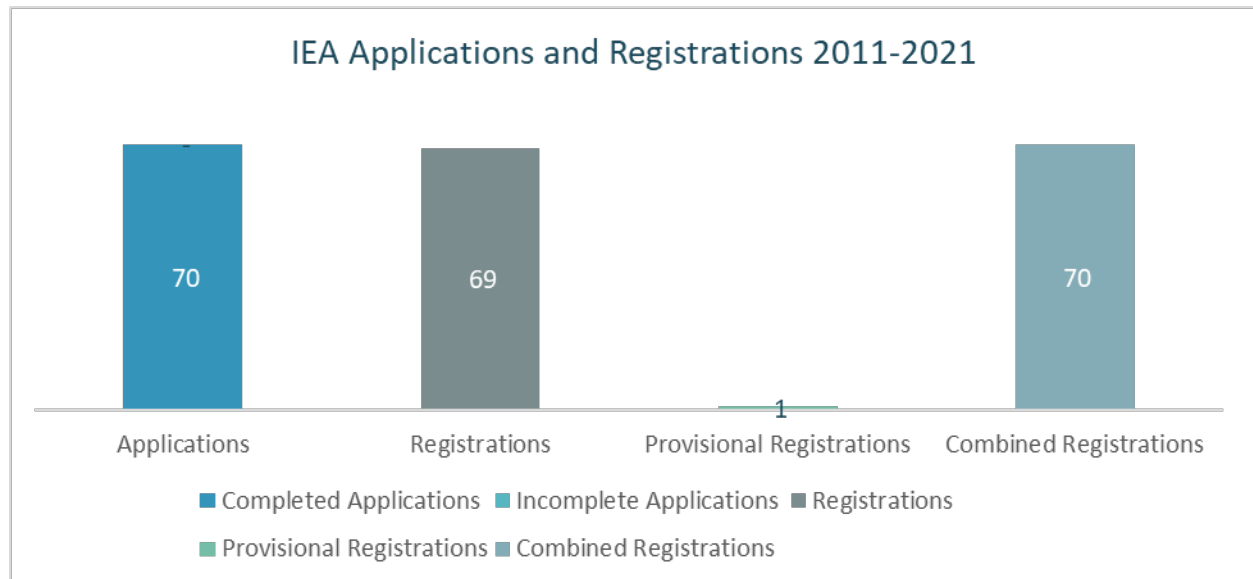
As indicated by the combined registration figure, all 70 IEAs who applied to the MCA from 2011 to 2021, were either registered or provisionally registered. One IEA applicant received provisional registration for a temporary registration. Provisional registration with MCA is not required for applicants in the registration process.

Application status as of December 2021 of IEAs 2011 to 2021

IEA Status as of December 2021					
Number of Complete Applications	Registrations	Provisional Registrations	Closed Files		In Process (not yet provisional)
			Withdrawals	Denials	
70	69	1	0	0	0

At the end of the reporting period, December 2021, outcomes for the 70 IEA applications indicates 69 registrations and 1 provisional registrations. There were no closed files (withdrawals or denials).

IEA registration outcomes by year

Breaking down the above IEA application outcomes by year indicates when these outcomes are distributed in the 2011 to 2021 period.

This table lists the number of applicants in a year together with various registration and closed file outcomes in a year. The applicants and the various outcomes in a year may not be comprised of the same individuals.

IEA Outcomes by Year 2011-2021				Closed Files	
Year	Completed Applicants	Registrations	Provisional Registrations	Withdrawals	Denials
2011	7	-	-	-	-
2012	9	10	-	-	-
2013	6	9	-	-	-
2014	5	5	-	-	-
2015	5	5	-	-	-
2016	7	8	1	-	-
2017	8	7	-	-	-
2018	5	-	-	-	-
2019	5	10	-	-	-
2020	8	6	-	-	-
2021	5	9	-	-	-
Total	**70**	**69**	**1**	**-**	**-**

IEA registration ratios and rates

Registration rate refers to the percentage of applicants with complete applications who apply in a given period and go on to register.

To calculate registration rate, all applications for the period must be resolved (registered or closed). A precise registration rate cannot be determined if there are applicants still in process at the end of the reporting period. This determination may be possible in future reporting years, when all of these files are resolved.

In this report, three **indicators** are used to provide a tentative sense of the registration rate (see below). Reasons are provided as to which indicator likely best approximates the registration rate for MCA.

Registration to Application Ratio

PROS: allows a comparison of IEAs to DAs. DA data is aggregate and only tracks applications and registrations by year.

CONS: likely undercounts IEA registrations. IEAs who applied before 2011, but who registered in the reporting period (2011 to 2021), are not counted because data collection begins with IEAs applying in 2011 or later.

PROS: DA registrations are not under-counted.

PROS: for both IEAs and DAs, the registration to application ratio becomes a more accurate indicator of the registration rate the longer the reporting period grows relative to the average registration timeline.

Late Period Registration to Application Ratio (2016 to 2021)

PROS: lessens the undercounting of IEA registrations. Few IEAs who applied before 2011 will register later than 2016.

PROS: allows a more equitable comparison to DA registration to application ratio for the period.

CONS: limited because the period may be short relative to registration timelines and more sensitive to variations in application numbers.

Resolved Registration Rate

PROS: a strong indicator in circumstances where a high percentage of files are resolved (registered or closed).

PROS: knowing the number of unresolved files (files still in process) allows us to determine the range within which the registration rate falls for the period.

CONS: with only aggregate data for DAs, a resolved registration rate cannot be determined and so no comparison can be made with the IEA resolved rate.

Registration to Application Ratio

# of registrations

÷

# of complete applications in a given year or period

_____

Late Period Registration to Application Ratio   2016-2021

# of registrations, 2016-2020, of individuals applying between 2011-2021

÷

# of complete applications made between 2016 and 2021

_____

Resolved Registration Rate
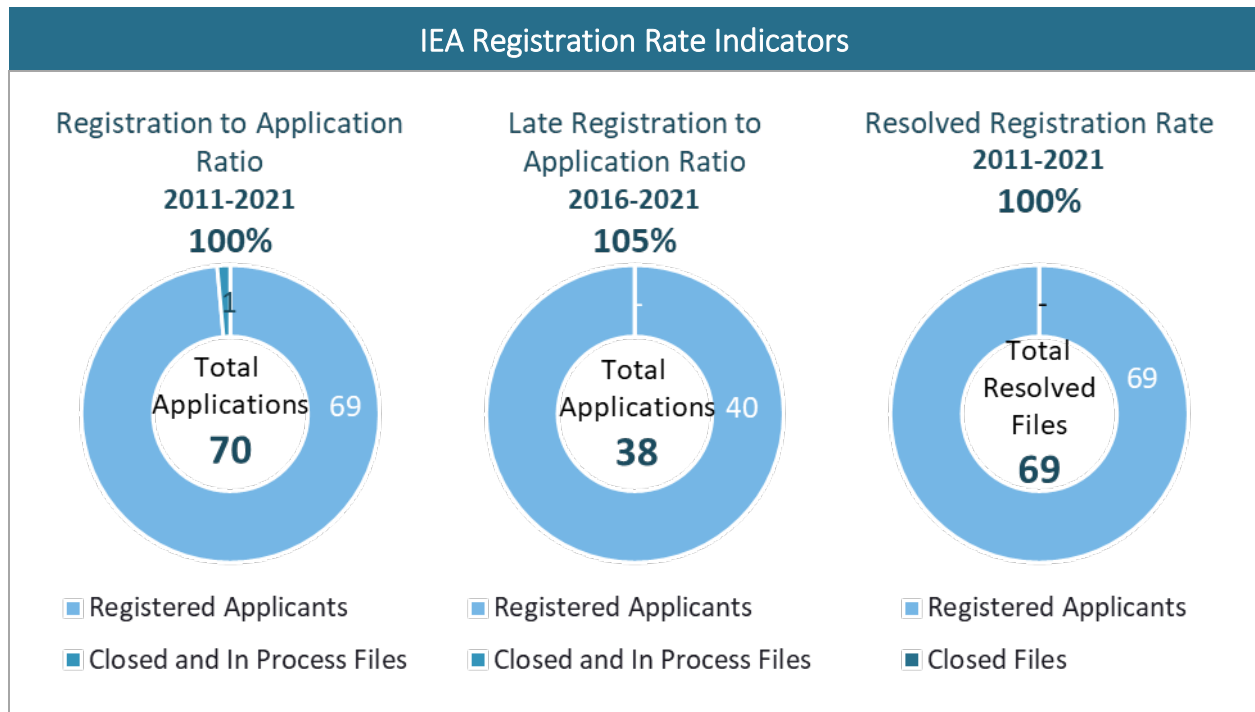
# of registrations

÷

# of complete application resolved files in a given year or period

MCA's registration rates and ratios

All applicants to MCA must first apply, write exams and be certified by CCEB. Registration data collected from MCA does contain through rate data for this first step. In this circumstance, this report is restricted to presenting indicators of the registration rate upon application to MCA, which represents only a part of the assessment and registration process.

The registration rate indicators below account for applicants who have successfully undergone the first steps in the national assessment process. Individuals unsuccessful with CCEB certification are not recorded in the data set.

These registration rate indicators all suggest near perfect through rates upon application to MCA: 99 per cent of applicants registered and one applicant provisionally registered with a temporary license.
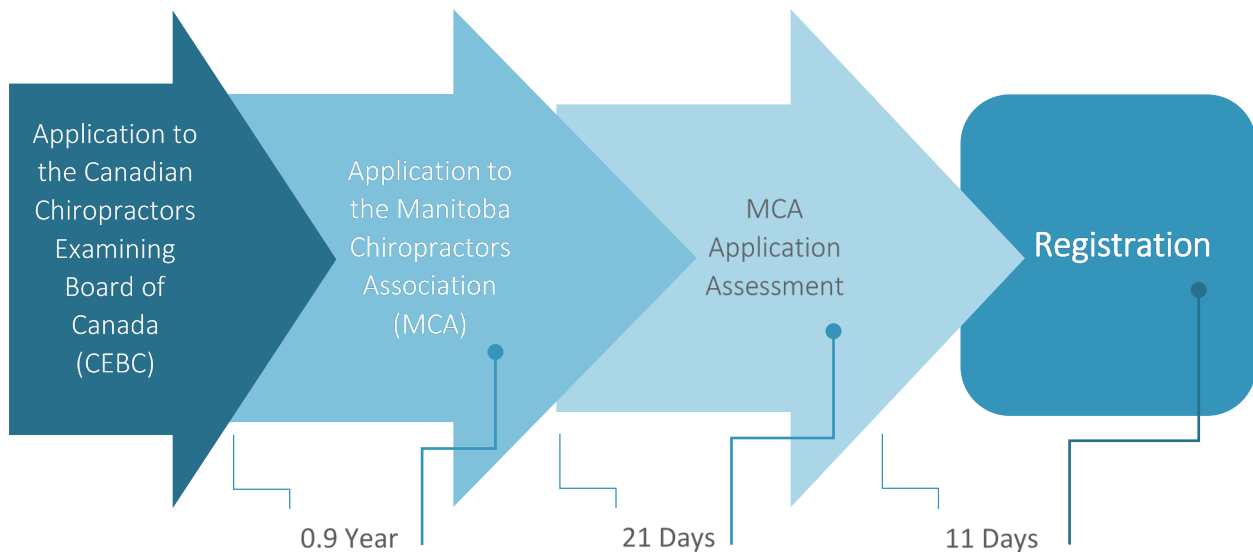
Registration Timelines 2011 to 2021

IEA average, median time to registration

Average time to registration 2011-2021	Median time to registration 2011-2021
1.3 years	1.1 years

These registration timelines are considered starting from the time applicants open a file with the first-step, CCEB, to registration with MCA.

These registration timeline figures are calculated using data from 52/70 registered IEAs for whom there is complete timeline information. Note. Complete timeline information was not available for the IEA with provisional registration.

IEA Median Time between Key Steps from Initial Application to Registration, 2011-2021

Application to the Canadian Chiropractors Examining Board of Canada (CEBC) → Application to the Manitoba Chiropractors Association (MCA) → MCA Application Assessment → Registration

0.9 Year   21 Days   11 Days

Breaking down IEA time to registration by key assessment step, most time occurs applying and completing the national, CCEB certification exams. Time to registration with MCA is short, less than a month.

IEA to DA Registration Ratio Comparison 2012 to 2021

FRPO collects application and outcome aggregate data on domestic applicants (DAs) in order to compare outcomes of IEAs to DAs. Data collection for DAs began in 2012. Comparisons below to DAs is for the **2012 to 2021** period.

IEA and DA Comparison 2012-2021
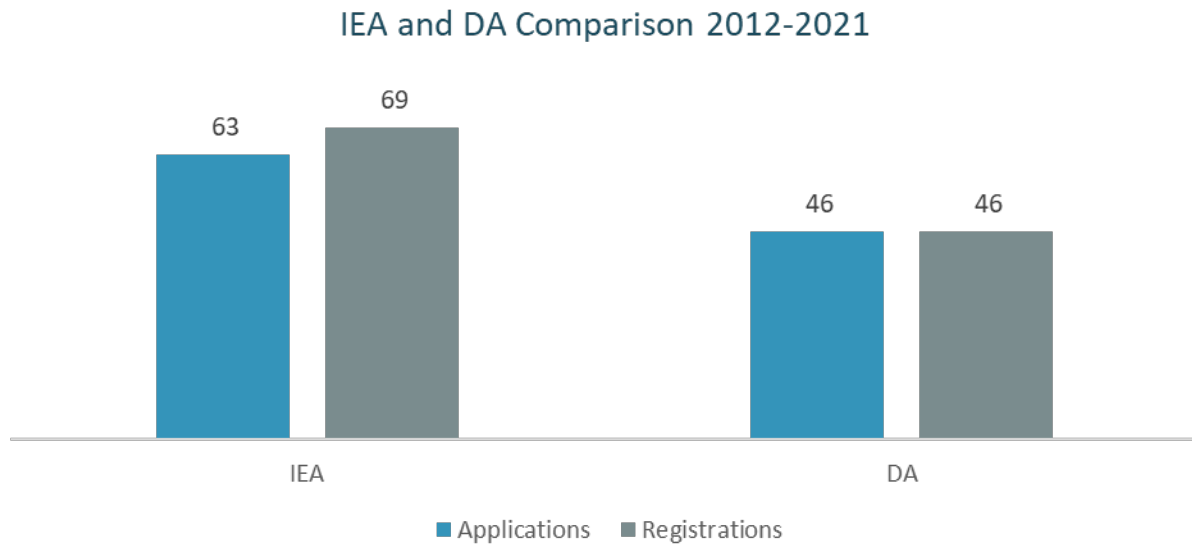
Both IEAs and DAs have high registration rates in this profession. IEA registrations out number applications (69 to 63) as some of the IEAs who registered in the 2012 to 2020 period, applied in 2011.

Trends

In this section, registration data is examined for the evidence of changes in registration rates and timelines over the 11-year reporting period. In some cases, changes to assessment and registration practice can be identified impacting the registration data.

IEA Median Time to Registration Trend 2011-2021

Median Time to Registration by Registration Year

Years to Registration

Median Time to Registration by Application Year
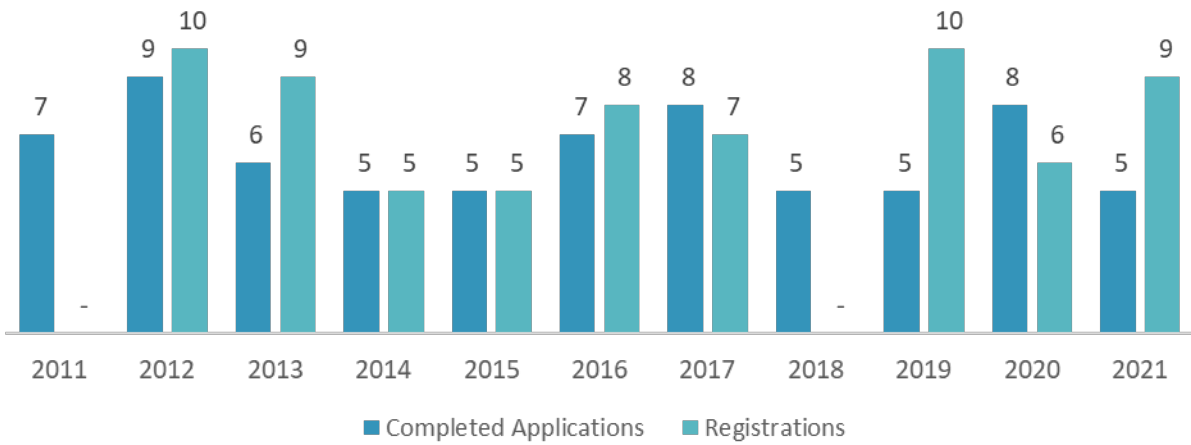

Years to Registration
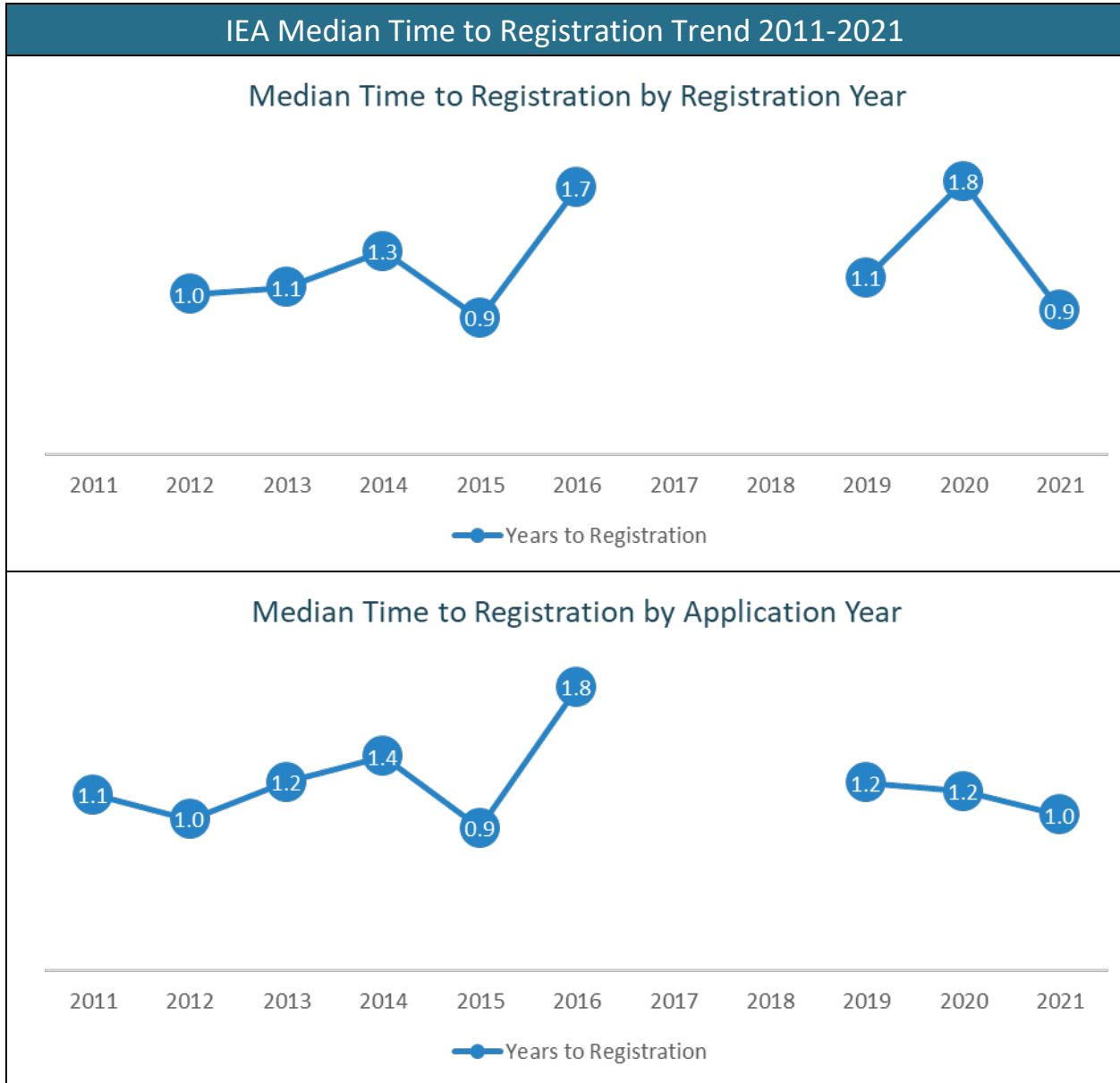
The graph above presents the median timeline to registration across an 11-year period from 2011 to 2021. Registration timelines fluctuate somewhat but with no pronounced trend toward increasing or decreasing timelines.
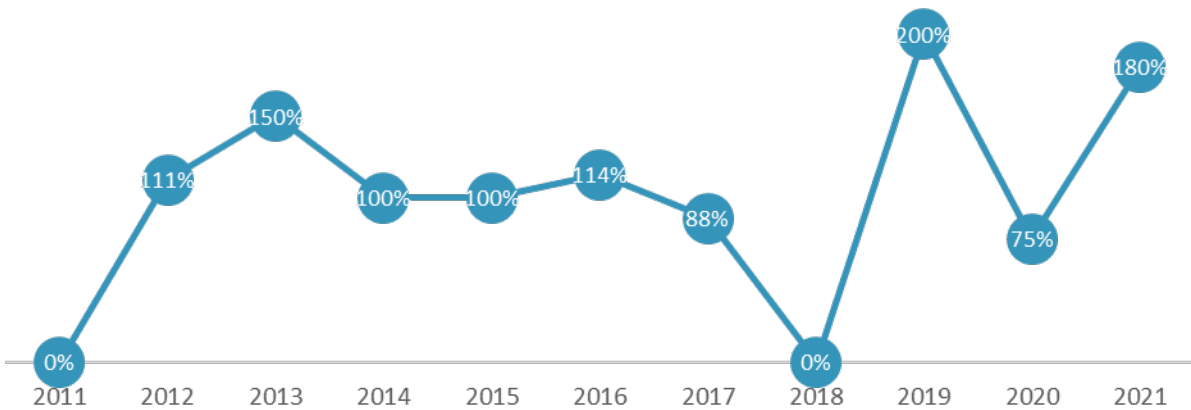
Note, 2017 and 2018 are blank as these years contain IEA files with incomplete timeline data recorded.
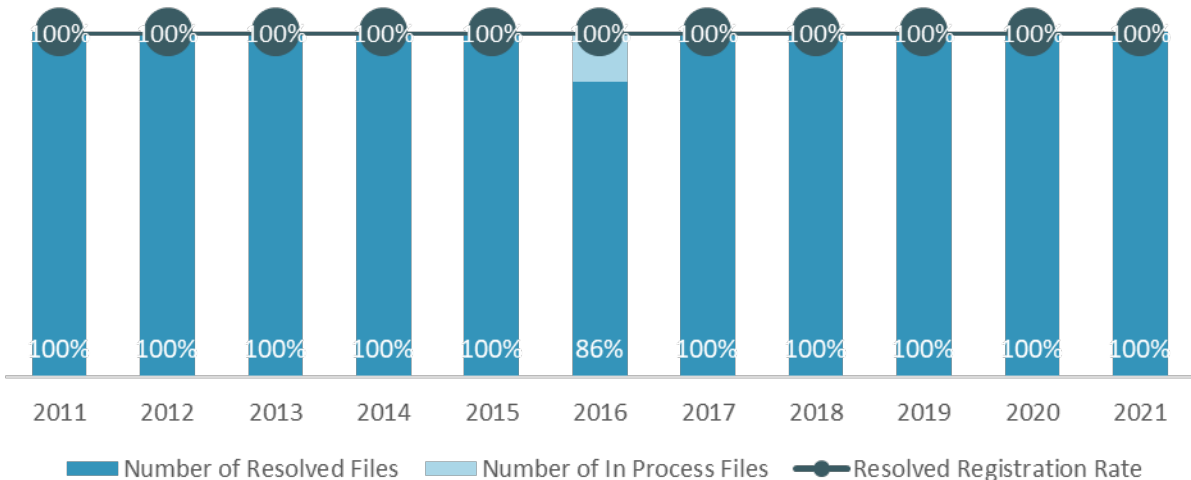
IEA Application and Registration Rate Trend

IEA Applications and Registrations by Year

Year	Completed Applications	Registrations
2011	7	-
2012	9	10
2013	6	9
2014	5	5
2015	5	5
2016	7	8
2017	8	7
2018	5	-
2019	5	10
2020	8	6
2021	5	9

Registration to Application Ratio by Year 2011-2021

Year	Ratio
2011	0%
2012	111%
2013	150%
2014	100%
2015	100%
2016	114%
2017	88%
2018	0%
2019	200%
2020	75%
2021	180%

Resolved Registration Rate by Year as of 2021

Year	Number of Resolved Files	Resolved Registration Rate
2011	100%	100%
2012	100%	100%
2013	100%	100%
2014	100%	100%
2015	100%	100%
2016	86%	100%
2017	100%	100%
2018	100%	100%
2019	100%	100%
2020	100%	100%
2021	100%	100%

Legend: Number of Resolved Files, Number of In Process Files, Resolved Registration Rate

MCA registered 69/70 IEAs across the 2011 to 2021 reporting period. One individual was provisionally registered with a temporary license (the 'in process' file identified in 2016 in the resolved registration rate graph). Consequently, there is no trend to increasing or decreasing registration rates to report; MCA's IEA through rate to registration is 99 per cent.

Note, MCA's registration rate figures are incomplete. The above charts speak only to applicants who were successful with the first step CCEB certification. Applicants unsuccessful with CCEB are not counted in the data.

Data Collection Moving Forward

In general, the quality of registration data provided by MCA for the 2011 to 2021 period is strong. IEA outcomes and timelines are presented throughout MCA's registration process and the IEA registration pathway is clear.

At this point, however, FRPO collects the first-step CCEB start date for IEAs, but does not collect outcome data for the CCEB certification process. Without a sense of CCEB through rates, the statistical picture is incomplete.

Data regarding individuals unsuccessful with CCEB certification and then intending to apply to MCA is not available. Precise through rate data for CCEB applicants in general also may not be available. However, there may be pass-rate statistics for exam sittings or application and certifications by year to consider and shed some light. This would only be partial light as the number of exams, the possibility of exam re-writes and the possibility of completing some exams before graduation frustrates any simple use of this sort of data.

MCA has provided FRPO a referral so we may discuss this matter with CCEB.

In collaboration with FRPO, MCA has a history of working to improve data collection. This has involved implementing and revamping data collection tools and documents, providing annual data submissions and validating data submissions. Most recently, this includes work reviewing this report, which would not have been possible without MCA's commitment and collaboration.