

MEMORANDUM

The Federation of Medical Regulatory Authorities of Canada (FMRAC)
Provincial and Territorial Ministries of Health
Provincial and Territorial Medical Associations
Royal College Specialty Committee Chairs
National Specialty Societies
Deans
Postgraduate Deans and Postgraduate Managers

To: Medical Council of Canada (MCC)
Le Collège des médecins du Québec (CMQ)
The College of Family Physicians of Canada (CFPC)
Canadian Resident Matching Services (CaRMS)
Association of Canadian Academic Healthcare Organizations (ACAHO)
The Canadian Association of Internes and Residents (CAIR)
Fédération des médecins résidents du Québec (FMRQ)
The Canadian Federation of Medical Students (CFMS)

From: Jason R. Frank, Director, Specialty Education, Strategy and Standards ,
Office of Education

Subject: Public notification of the addition of Emergency Medicine as an entry route
to the subspecialty of Pain Medicine

Date: November 30, 2012

This memo is provided to stakeholders of the Royal College, to seek your feedback on a proposed change to add Emergency Medicine as a route of entry to the newly recognized subspecialty of Pain Medicine.

Overview of the Proposal

Over the summer of 2012, the Office of Education received a formal entry route change request from the Working Group in Pain Medicine and the Specialty Committee in Emergency Medicine, to have Emergency Medicine added as a route of entry to the recently recognized subspecialty of Pain Medicine.

Under the recently approved policy governing requests for changes to a discipline's entry routes (*see attachment*), the Royal College's Committee on Specialties (COS) has the mandate to consider these requests, assessing the overall potential impact for the system of specialty medicine, and determine if they are major or minor in nature. This advice determines the next steps followed by the Office of Education in reviewing and potentially approving the request.

The COS acknowledged that both specialty committees were in support of this additional entry route to Pain Medicine, and there were likely to be few, if any, negative unintended consequences. After discussion, the committee endorsed a motion acknowledging the request as a *minor change*, requiring, as per the policy, a public notification to all stakeholders to ensure the implications of this decision have been considered prior to its formal approval.

Opportunity to Provide Feedback

As a key stakeholder of the Royal College, you are asked to provide any feedback on this change in entry route proposal by February 1, 2013, by sending an email to cos@royalcollege.ca. In addition, this notice will be posted to the Royal College's website to invite feedback via that platform.

Following February 1, 2013, this proposal and any feedback received, will be presented to the Director, Specialty Education, Strategy, and Standards for a final decision. If the change in entry route is approved, key stakeholders will be advised of the change in April 2013.

The Office of Education would be pleased to receive your comments, questions or any concerns regarding this proposal by **February 1, 2013** at the latest. Your response sent by e-mail to cos@royalcollege.ca would be greatly appreciated.



POLICY AND PROCEDURE FOR MODIFICATIONS TO DISCIPLINE ENTRY ROUTES

AUGUST 2012 (PENDING APPROVAL BY EDUCATION COMMITTEE NOV 2012)

1 POLICY

Royal College recognized disciplines change over time, to ensure disciplines and training standards evolve to meet the health needs of Canadians. The Royal College recognizes that it may become appropriate to make modifications to the configuration of recognized disciplines, including their entry routes. This policy provides guidance on types of entry route changes that may be considered, and the procedure for consideration of an entry route change request.

A modification to a discipline entry route should:

- allow greater clarity and transparency about the general scope and nature of the discipline; and,
- provide for greater consistency in the discipline's training model by highlighting the acceptable pathways to achieving the competencies of a given discipline.

In this policy, the term "discipline" may refer to any of the types of disciplines that are recognized by the Royal College, including: specialties, subspecialties, and areas of focused competence (AFC, or diplomas).

REGULATORY FRAMEWORK

Bylaw No. 17-Amended, Article 4.1 states that "Certificates of qualification may be granted in specialties approved by the Council under regulations promulgated by the Council".

RATIONALE FOR CHANGE OF AN ENTRY ROUTE

A need for a modification to an entry route may result from a number of different reasons, notably:

- To better reflect changes to a discipline's scope and nature;
- To adapt to new training models (i.e. the creation of a new discipline or new training pathway);
- To increase consistency with other jurisdictions; or
- Following a change in the status of a related discipline.

TYPE OF MODIFICATION

A modification to an entry route can include any of the following:

- a) A change to an existing route; or
- b) The removal of an existing route; or
- c) The addition of a new route.

Based on the possible impact on the system of specialty medicine, the requested modification to an entry route can be either minor or major, as described below:

- Minor: the requested change is not fundamental, thereby having little or no impact on the nature or scope of practice of the discipline in question, and with very few intended consequences anticipated for the system of specialty medicine as a whole. Minor changes, for example, can involve those that follow inevitably from other associated changes in the education system, e.g. should an existing discipline cease to exist, a minor change would occur to delete it from those disciplines which previously listed it as a possible entry route. They can also involve cases where the proposed change is endorsed by all affected disciplines, with few, if any, anticipated consequences for the rest of the system.
- Major: the requested change to an entry route is fundamental, thereby potentially impacting on the accessibility of the discipline to entrants, and the educational or training requirements or scope of practice of the discipline in question. They can also involve cases where the proposed change is likely to cause disagreement or dispute among existing Royal College disciplines, possibly evoking the Royal College's Resolution Mechanism for Adjudicating Disputes between Disciplines.

2 PROCEDURE

- 2.1 A request to modify a discipline's entry route will be considered from the discipline's Specialty Committee. The applicant should submit the request to the Office of Education c/o the Director, Specialty Education, Strategy, and Standards.
- 2.2 A request for a modification to a discipline entry route must include a completed application form ("Entry Route Modification Application Form"), and all required supporting documents (e.g. Environmental Scan, Letters of Support, etc.) as detailed on the application form.
- 2.3 The Office of Education reviews applications to ensure that all criteria and application requirements have been fulfilled. If they have not, the Office of Education will confer with the requestor to complete the application.
- 2.4 Completed applications are presented to the Committee on Specialties (COS), the decision-making authority for specialty medicine and discipline recognition. The COS will be asked to decide whether the change request is minor or major in nature.
- 2.5a For Minor Changes to a Discipline Entry Route:
 - 1) The Chief Executive Officer (CEO) will delegate authority to the Director, Specialty Education, Strategy, and Standards ("Director").
 - 2) The Office of Education will provide a summary of the COS decision to the Director for consideration. Following review by the Director, a public notification of the intent towards a potential modification to a discipline entry route will be announced through Royal College web postings and the Office of Education newsletter publications.
 - 3) Interested parties will have 60 days to submit their comments following this notification. A summary of comments received will be provided to the Director for consideration.
 - 4) Substantive objections will result in the application being denied and the Office of Education will inform the applicant of the decision. However, if the majority of



comments are supportive of the request for a modification to an entry route, the Director will deem the request approved. The Director will inform the Education Committee of all decisions regarding minor modifications of a discipline entry route.

- 5) For accepted change requests, the Royal College will implement the change in accordance with its internal processes.
 - a) Once the implementation date has been set, the Director will officially notify all Directors across the Royal College. The Directors will ensure their staff takes all necessary actions to operationalize the modification. These actions include ensuring all documents reflect the revised entry routes.
 - b) The Director will send an official notice to the Specialty Committees, the National Specialty Societies, the Universities and the affiliated organizations announcing the recent modifications.
- 6) For denied change requests, an appeal may be submitted in writing to the Elected Chair of the Education Committee of the Royal College. This appeal must contain details outlining where there were errors in process in reaching the decision and factors that were felt not to be duly considered.
 - a) The appeal information, along with the information submitted to COS, and the decision letter, will be presented by the Chair to the Education Committee.
 - b) If the request for an appeal is felt to warrant further consideration, a three member panel will be constituted, consisting of at least two members of the Education Committee. It shall also include at least one member from the parent discipline.
 - c) This panel will consider all of the information available and render a recommendation to Education Committee, which will make a final decision.

2.5b For Major Modifications to a Discipline Entry Route:

- 1) A national consultation on the proposed modification to a discipline entry route will be conducted by the Office of Education (typically 4-6 month process). A list of stakeholders (see Attachment 1) will be asked to provide feedback about the application (e.g., the impact the application may have on other disciplines, the public, regulations, remuneration, medical education and access to training programs).
- 2) The compiled results of the consultation are submitted to the COS for consideration at the next meeting.
- 3) The COS recommendation about whether or not to endorse the entry route change will then proceed to the Education Committee for consideration and to render a final decision.
- 4) The Office of Education will subsequently inform the applicant of the final decision.
- 5) For accepted change requests, the Royal College will implement the modification to the entry route.
 - a) Once the implementation date has been set, the Director will officially notify the all Directors across the college. The Directors will ensure their staff takes all necessary actions to operationalize the modification. These actions include ensuring all documents reflect the revised entry routes.



- b) The Director will send an official notice to the Specialty Committees, the National Specialty Societies, the Universities and the affiliated organizations announcing the modification to the discipline entry route.
- 7) For denied requests, an appeal may be submitted in writing to the Elected Chair of the Education Committee of the Royal College. This appeal must contain details outlining where there were errors in process in reaching the decision and factors that were felt not to be duly considered.
- a) The appeal information, along with the information submitted to COS, and the decision letter, will be presented by the Chair to the Education Committee.
 - b) If the request for an appeal is felt to warrant further consideration, a three member panel will be constituted, consisting of at least two members of the Education Committee. It shall also include at least one member from the parent discipline.
 - c) This panel will consider all of the information available and render a recommendation to Education Committee, which will make a final decision.

Attachment1

List of National Stakeholders Consulted

1. Canadian Association of Internes and Residents of Canada (CAIR)
2. Collège des médecins du Québec (CMQ)
3. Federal Medical Regulatory Authority & Provincial Medical Regulatory Authorities (FMRAC), Federal and provincial.
4. Fédération des médecins résidents du Québec (FMRQ)
5. Parent Specialty(ies) and related specialties as appropriate.
6. Program Directors of parent Specialties
7. National Specialty Societies (related to the Specialty Committees consulted)
8. Royal College Regional Advisory Committees (RACs)
9. Royal College Fellowship Affairs Committee (FAC)
10. The Association of Faculties of Medicine of Canada (AFMC): (Deans and Postgraduate Deans)
11. Ministries of Health (Federal and provincial)
12. Canadian Resident Matching Services (CaRMS)
13. College of Family Physicians of Canada (CFPC)
14. Additional stakeholder groups as requested by the applicant.