



COUNCIL POLICY

Registration in the Educational Classes for Medical Students and Residents

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Preamble

This Policy relates to registration in the following classes:¹

- Educational (medical student) class
- Educational (resident) class
- Educational (resident-limited) class
- Educational (external or visiting student) class
- Educational (non-practicing) class

Applicants for registration in the educational classes must satisfy the following requirements from the *CPSM General Regulation*:

- **Common Requirements** for all registrants of CPSM at s. 3.2,²
- **Non-Exemptible Requirements** for all Regulated Associate Registrants at s. 3.37,³ and
- the **Specific Requirements** from the *CPSM General Regulation* that apply to each of the above classes of registration, which are reproduced in this Policy for ease of reference.

The purpose of this Policy is to set out additional registration requirements that have been approved by Council. This Policy addresses what is required for a certificate of registration. It does not deal with the requirements for certificates of practice, which are described at Part 4 of the *CPSM General Regulation*.⁴

Important references to practice limitations that apply to all educational residents are provided at Part 5 of this Policy, below.

¹ This Policy describes all educational registration classes, except for Physician Assistant students which are addressed in another Council Policy.

² RHPA at s. 32(1).

³ Subsection 3.2(1) of the *CPSM General Regulation* at point 9.

⁴ Part 4 of the *CPSM General Regulation* establishes the requirements for issuing a certificate of practice. Of note, s. 4.1 states, "A certificate of registration does not entitle a member to practise medicine. To do so, a member must also hold a certificate of practice. ..."

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1. Educational (medical student) class

This class is for medical students enrolled at the Manitoba faculty.

1.1. Specific requirements

- 1.1.1. Specific requirements for registration in the educational (medical student) class are at section 3.48 of the *CPSM General Regulation*:

3.48 An applicant for registration as an educational (medical student) member must establish that he or she is confirmed by the Manitoba faculty to be enrolled as a medical student.

1.2. Terms and conditions:

- 1.2.1. Section 3.49 of the *CPSM General Regulation* states that, "As a condition of registration, a member must continue to be enrolled as a medical student with the Manitoba faculty."

1.3. Cancellation

- 1.3.1. In accordance with section 3.93 of the *CPSM General Regulation*, registration is cancelled if the member:
1. ceases to be enrolled as a medical student with the Manitoba faculty, or
 2. or upon expiry of the specified period for which the registration was issued.

2. Educational (resident) class

This class is designed for physicians undergoing residency training with the Manitoba faculty. Registration as an educational (resident) requires a degree in medicine or osteopathic medicine from an eligible institution, and enrolment in a residency training program at the Manitoba faculty.

2.1. Specific requirements

- 2.1.1. Specific requirements for registration in the educational (resident) class are set out at section 3.52 of the *CPSM General Regulation*:

3.52 An applicant for registration as an educational (resident) member must establish that

(a) he or she holds

(i) a medical degree from a faculty of medicine approved by the CACMS or LCME,

(ii) a Doctor of Osteopathic Medicine degree from a school in the United States accredited by the American Osteopathic Association Commission on Osteopathic College Accreditation, or

(iii) a medical degree from any other nationally approved faculty of medicine;

(b) he or she is enrolled in a residency training program at the Manitoba faculty.

2.2. Terms and conditions:

- 2.2.1. Section 3.53 of the *CPSM General Regulation* prescribes conditions that apply to registration in the educational (resident) class:

3.53(1) As a condition of registration, a member must continue to be enrolled in a residency training program at the Manitoba faculty.

3.53(2) As an additional condition of registration, the registrar may require an educational (resident) member to complete an orientation program approved by the registrar within a specified time period.

2.3. Cancellation

- 2.3.1. Subsection 3.93(1)(b)(iii) of the *CPSM General Regulation* states that the registration of an educational (resident) is cancelled if they cease to be enrolled in the residency training program with the Manitoba faculty.

3. Educational (resident-limited) class

The educational (resident-limited) class is designed to permit residents deemed competent by the Manitoba faculty to practice within their specialty field during the periods and at the locations approved by the Manitoba faculty.⁵ They remain under an educational license and, consequently, are never the most responsible physician for patients.

Only physicians currently registered as residents are eligible for registration in the resident-limited class. Therefore, the members of this class are not required to comply with the common application requirements – they will have already done so when they applied to the resident class. They must meet the specific requirements for registration under section 3.54 of the *CPSM General Regulation*.

Note that section 2.10 of the *CPSM General Regulation* (field of practice) applies to the educational (resident-limited) class, meaning their registration must reflect their licensed field of practice.

3.1. Specific requirements

- 3.1.1. Specific requirements for registration in the educational (resident-limited) class are set out at section 3.54 of the *CPSM General Regulation*:

3.54 An applicant for registration as an educational (resident-limited) member must

- (a) establish that he or she was registered as an educational (resident) member in good standing immediately before making the application;*
- (b) establish that he or she has successfully completed a portion of training in an approved specialty field of practice; and*

⁵ This is generally referred to as moonlighting. Residents are still to be supervised by the program and must comply with applicable policies and requirements, including for moonlighting and prescribing.

(c) provide written confirmation from the program director and the dean of Post-Graduate Medical Education at the Manitoba faculty (or the dean's designate) that

- (i) he or she is enrolled in a residency training program at the Manitoba faculty,*
- (ii) he or she is competent to provide the specified medical services including the performance of the specified reserved acts,*
- (iii) he or she is legally entitled to work in Manitoba, and*
- (iv) the Manitoba faculty undertakes to continue to supervise the applicant as a resident while he or she is registered as an educational (resident-limited) member;*

3.2. Terms and conditions:

- 3.2.1. All educational (resident-limited) registrations are time limited and may be for a specific practice setting (see section 3.55 of the *CPSM General Regulation*).
- 3.2.2. All educational (resident-limited) registrations are subject to the condition that the physician be enrolled in and be in good standing in their residency training program at the Manitoba faculty (see section 3.56 of the *CPSM General Regulation*).
- 3.2.3. Section 4.18, which is under Part 4 of the *CPSM General Regulation* (Certificates of Practice), requires active participation in a residency program as a license condition:

4.18 An educational (resident-limited) member must actively participate in his or her residency training program.

3.3. Cancellation and conversion:

- 3.3.1. Section 3.78 of the *CPSM General Regulation* provides:

3.78(1) If a member who is registered in the educational (resident-limited) class is no longer providing the specified medical services in the community but is still enrolled in the residency training program, the registrar may change the member's registration to the educational (resident) class.

3.78(2) If a member who is registered in the educational (resident-limited) class takes a leave of absence from the residency program, the registrar may change the member's registration to the educational (non-practising) class.

- 3.3.2. The registration of an educational registrant is cancelled if they cease to be enrolled in the residency training program with the Manitoba faculty (see subsection 3.93(1)(b)(iii) of the *CPSM General Regulation*).

4. Educational (external or visiting student) class

This class is intended for students or graduates of approved faculties of medicine outside Manitoba who are also enrolled in the Manitoba faculty for a limited period. Ordinary disclosure requirements apply to these applicants, but given the special nature of registration as an external or visiting student, instead of other registration requirements, the applicant must meet all the following requirements:

- submit a signed application in the approved form,
- submit the fees provided for in the by-laws,
- if applicable, submit their MINC number,
- establish that they are a graduate or a student of a nationally approved faculty of medicine outside Manitoba,
- establish that they are in good standing with the regulatory authority in the jurisdiction in which they are currently authorized to practise medicine, and
- the specific requirements at section 3.57 of the *CPSM General Regulation*.

4.1. Specific requirements:

- 4.1.1. Specific requirements for registration in the educational (external or visiting student) class are at section 3.57 of the *CPSM General Regulation*:

3.57 An applicant for registration as an educational (external or visiting student) member must

(a) establish that he or she is a graduate, or an undergraduate or post-graduate student in good standing, of either

(i) a nationally approved faculty of medicine located outside Manitoba, or

...

(b) if applicable, establish that he or she is in good standing with the regulatory authority in the jurisdiction in which he or she is currently authorized to practise medicine; and

(c) provide written confirmation from the dean of the Manitoba faculty (or the dean's designate) that

(i) he or she has been accepted by the Manitoba faculty as an external or visiting student in a specified department,

(ii) he or she is legally entitled to study in Manitoba,

(iii) he or she meets the approved English language fluency criteria,

(iv) a specified regulated member from the department in which the external or visiting student will be studying has been designated to supervise the student, and

(v) he or she has obtained a criminal record check from the jurisdiction in which the applicant is currently authorized to practise medicine, or is enrolled in the faculty or program, that is satisfactory to the Manitoba faculty.

4.2. Time Limited Registration:

- 4.2.1. Section 3.58 of the *CPSM General Regulation* provides that “A person may be registered as an educational (external or visiting student) member for a time period of not more than six consecutive months, which may be extended in accordance with sections 3.71 to 3.73.” The Registrar may extend registration for up to twelve (12) additional months. Extension can only occur if the student provides a written request from the dean of the Manitoba Faculty (or the dean’s designate) for an extension before the initial registration expires and sets out the reasons for the extension request. Written reasons must be given by the Registrar, and the student has a right of appeal.

4.3. Terms and conditions:

- 4.3.1. Section 3.59 of the *CPSM General Regulation* provides that “As a condition of registration, an educational (external or visiting student) member must continue to be enrolled as an external or visiting student with the Manitoba faculty or the Physician Assistant Education Program at the University of Manitoba, as the case may be.”
- 4.3.2. Practice is limited to practice under the supervision of the teaching staff in a particular department or departments. Other conditions may be imposed, depending upon the circumstances.

4.4. Cancellation:

- 4.4.1. In accordance with section 3.93 of the *CPSM General Regulation*, an external or visiting student’s registration is cancelled if they cease to be enrolled as an external or visiting medical student with the Manitoba faculty, or the specified period for which the registration was issued expires.

5. Educational registrant practice limitations:**5.1. Supervision:**

- 5.1.1. Although having a Practice Supervisor is not a requirement for registration in the medical student, visiting student, educational (resident) or (resident-limited) classes, student and residents are supervised by the Manitoba faculty's residency training program. CPSM's Standard of Practice for Professional Responsibilities in Undergraduate & Postgraduate Medical Education applies and includes requirements for the supervisory relationship in the educational practice setting.

5.2. Reserved acts:

- 5.2.1. The performance of reserved acts by an educational registrant is limited in accordance with Part 5 of the *CPSM General Regulation*.

1. Section 5.18 of the *CPSM General Regulation* provides that a student or resident may perform a reserved act only if they are supervised by a physician who is legally permitted and competent to perform the reserved act. The physician must be physically present and available to assist during the performance of the reserved act unless the supervising physician determines that the individual student or resident does not require that level of supervision, in which case the supervising physician must be available for consultation while the reserved act is being performed.
2. Requirements for prescribing, which is a reserved act, are detailed at sections 5.4 (authorization to prescribe), 5.5 (prescription requirements), 5.6 (prescription renewals), and 5.7 (issuing a requisition) of the *CPSM General Regulation*. This includes that prescribing must be authorized by the Registrar. For ease of reference, section 5.4 states:

5.4(1) An educational (resident) or (resident-limited) member may prescribe a drug or vaccine only if the member is authorized to do so and only in accordance with the requirements of this Part.

5.4(2) An authorization is limited to prescribing drugs and vaccines to patients treated by the member in an educational setting.

5.4(3) To obtain an authorization, the member must apply in writing to the registrar and meet the following criteria:

(a) [repealed] M.R. 100/2023;

(b) he or she must provide a letter signed by the member's program director and the Associate Dean of Post-Graduate Medical Education (or designate) confirming that

(i) the member is registered as a resident in good standing and is, at a minimum, in his or her second year of residency training,

(ii) there are no clinical or ethical concerns with the member being authorized to prescribe a drug or vaccine, and

(iii) the member has participated in an approved educational program about pharmacology and pharmacotherapy.

5.4(4) The registrar may issue an authorization, which may be subject to any additional conditions that the registrar considers necessary or advisable.

3. For the purposes of section 5.4(3)(b)(ii) of the *CPSM General Regulation*, the approved pharmacology and pharmacotherapy course for resident prescribing is the “*Prescription Writing Course*” offered through the Max Rady College of Medicine PGME core curriculum on limited resident prescribing.

4. Limits on the ability for residents to delegate reserved acts are set out at sections 5.16 to 5.17 of the *CPSM General Regulation*.

6. Educational (non-practicing) class

6.1. This class is for students who are on leave of absence approved by the Manitoba Faculty. Section 3.60 of the *CPSM General Regulation* provides:

An applicant for registration as an educational (non-practising) member must establish that

(a) he or she was registered or was qualified to be registered as an educational member in good standing immediately before applying for educational (non-practising) membership; and

(b) his or her leave of absence has been approved by the Manitoba faculty.