



COUNCIL POLICY

Registration of Clinical and Physician Assistants and Physician Assistant Students

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PREAMBLE:

Clinical Assistants (CIAs), Physician Assistants (PAs), and Physician Assistant Students (PA Students) may be registered as Regulated Associate Members in one of the following classes:¹

- Educational (Physician Assistant Student),
- Educational (External or Visiting Student),
- Educational (Non-Practicing),
- Physician Assistant (Full),
- Physician Assistant (Restricted Purpose),
- Physician Assistant (Academic – S. 181 Faculty),
- Physician Assistant (Non-Practicing),
- Clinical Assistant (Full),
- Clinical Assistant (Non-Practicing),
- Retired (Physician Assistant), and
- Retired (Clinical Assistant).

CIA, PA, and PA Student applicants must satisfy the following registration requirements found in the *CPSM General Regulation*:²

- common requirements for all registrants of CPSM listed at s. 3.2,
- non-exemptible requirements for all Regulated Associate Members listed at s. 3.37, and
- specific provisions that apply to the class for which they are applying.^{3, 4}

Specific provisions of the *CPSM General Regulation* that apply to CIA, PA and PA Student classes of registration 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.

¹ See s. 2.4 of the *CPSM General Regulation*.

² The RHPA at s. 33 states, “an application for registration as a regulated associate member must be considered and decided upon in accordance with the regulations.”

³ As an exception, an applicant for registration in the Physician Assistant (Academic — Section 181 Faculty) Class must provide satisfactory evidence that they meet the requirements at s. 181(1)(b) of the RHPA.

⁴ See s. 3.2(1) of the *CPSM General Regulation* at point 9(b).

This Policy only relates to the issuance of certificates of registration. It does not deal with the requirements for certificates of practice listed at Part 4 of the *CPSM General Regulation*.⁵ Certificates of practice and other practice requirements for CIAs, PAs, and PA Student are also addressed in the ‘Practice and Supervision Requirements for CIAs, PAs, and PA Students’ Practice Direction and at Part 8 of the *CPSM General Regulation*.

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1. APPLICABLE PRACTICE LIMITATIONS

- 1.1. Although not registration requirements, it is important to note that the ability of CIAs and PAs to engage in their professional practice is limited by the following CPSM regulations:
- 1.1.1. Part 8 of the *CPSM General Regulation* concerning practice description and contract of supervision requirements for PAs and CIAs,⁶
 - 1.1.2. Part 6 of the *CPSM General Regulation* concerning title restrictions, and

⁵ 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. This Part adds to the requirements in the [RHPA] for a certificate of practice.” Additional requirements for CIAs and PAs are set out at s. 4.5.

⁶ See also the [‘Practice Direction Practice and Supervision Requirements for CIAs, PAs, and PA Students’](#).

- 1.1.3. sections 4, 5 and 6 of the RHPA, section 6 of the *CPSM Practice of Medicine Regulation*, and Part 5 of the *CPSM General Regulation* respecting the performance and delegation of reserved acts.
- 1.2. PA Students do not require a practice description and contract of supervision. Their scope of practice is limited to practice under the supervision of the teaching staff in a particular department or departments of their educational program. Other conditions may be imposed, depending upon the circumstances. Sections 5.18, 5.19 and 5.20 of the *CPSM General Regulation* limit the performance of reserved acts by all students, including PA Students. Further information about the practice of PA Students is provided in the attached contextual information document.

2. EDUCATIONAL (PHYSICIAN ASSISTANT STUDENT) CLASS

2.1. Specific requirements for registration:

- 2.1.1. This class is established for the registration of PA Students. The specific requirements for the Educational (Physician Assistant Student) Class are set out at section 3.50 of the *CPSM General Regulation*:

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

2.2. Terms and Conditions on registration:

- 2.2.1. Section 3.51 of the *CPSM General Regulation* states:

3.51 As a condition of registration, a member must continue to be enrolled as a physician assistant student in the Physician Assistant Education Program at the University of Manitoba.

2.3. Cancellation of Registration:

- 2.3.1. Pursuant to section 3.93 of the *CPSM General Regulation*, a PA Student's registration is cancelled if they cease to be enrolled as a PA Student with the Physician Assistant Education Program, or if their registration in the Physician Assistant (Full) Class is approved by the Registrar, in which case they are converted to that class.

3. EDUCATIONAL (EXTERNAL OR VISITING STUDENT) CLASS

3.1. Specific requirements for registration:

3.1.1. The Educational (External or Visiting Student) Class is intended for students or graduates of approved faculties of medicine (i.e., medical students) or physician assistant training programs (i.e., PA Students) outside Manitoba who are also enrolled in the Manitoba faculty for a limited period. Given the special nature of registration as an external or visiting student, the applicant must meet all the following requirements instead of other usual disclosure requirements (i.e., the common requirements for all registrants are reduced for this class):

- 3.1.1.1. submit a signed application in the approved form,
- 3.1.1.2. submit the fees provided for in the by-laws,
- 3.1.1.3. establish that they are a graduate or a student of an approved physician assistant training program outside Manitoba,
- 3.1.1.4. establish that they are in good standing with the regulatory authority in the jurisdiction in which they are currently authorized to practise medicine, and
- 3.1.1.5. the specific requirements at section 3.57 of the *CPSM General Regulation*.

3.1.2. The specific requirements for registration in the Educational (External or Visiting Student) Class are set out 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

(ii) an approved physician assistant training program located outside Manitoba;

(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.

3.2. Approved PA training programs located outside of Manitoba:

- 3.2.1. For the purposes of subsection 3.57(a)(ii) of the *CPSM General Regulation* (see directly above), Council has approved the following physician assistant training programs located outside of Manitoba:
- 3.2.1.1. the Canadian Armed Forces,
 - 3.2.1.2. University of Toronto,
 - 3.2.1.3. McMaster University,
 - 3.2.1.4. a university-affiliated program in Canada satisfactory to the Board of Assessors, and
 - 3.2.1.5. a physician assistant training program accredited by the Accreditation Review Commission on Education for the Physician Assistant (ARC-PA) in the United States.

3.3. Terms and conditions on registration:

- 3.3.1. 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.”
- 3.3.1.1. The Registrar may extend registration for up to twelve (12) additional months. An 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.
- 3.3.2. 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.”

3.4. Cancellation of registration:

- 3.4.1. In accordance with section 3.93 of the *CPSM General Regulation*, an external or visiting PA Student's registration is cancelled if they cease to be enrolled with the Physician Assistant Education Program or the specified period for which the registration was issued expires.

4. **EDUCATIONAL (NON-PRACTICING) CLASS**

- 4.1. This class is for PA 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.

5. **PHYSICIAN ASSISTANT (FULL) CLASS**

5.1. Specific requirements for registration:

- 5.1.1. The specific requirements for registration in the Physician Assistant (Full) Class are set out at section 3.61 of the *CPSM General Regulation*:

3.61 An applicant for registration as a physician assistant (full) member must

- (a) establish that he or she has satisfactorily completed an approved clinical training program; and*
(b) establish that he or she meets one of the following criteria:
(i) he or she is a graduate of the Physician Assistant Education Program at the Manitoba faculty,
(ii) he or she
(A) is a graduate of a physician assistant training program accredited by the Accreditation Review Commission on Education for the Physician Assistant (ARC-PA) in the United States,
(B) has passed the examination set by the NCCPA,
and

(C) holds the designation "PA-C",⁷ [or]
(iii) he or she is a graduate of another approved physician
assistant training program.

5.2. Examinations required by Council:

- 5.2.1. In accordance with subsection 3.37(a) of the *CPSM General Regulation*, Council requires that the applicant must have passed one of the following examinations to be initially registered in the Physician Assistant (Full) Practicing Class:⁸
- 5.2.1.1. the Physician Assistant Entry to Practice Certification Examination ("PA Certification Examination")⁹, or
 - 5.2.1.2. the examination set by the NCCPA.

5.3. PA training programs approved by Council:

- 5.3.1. In addition to the PA training programs identified at ss. 3.61(b) of the *CPSM General Regulation* (see directly above), the following training programs have been approved by Council for the purposes of ss. 3.61(b)(iii):
- 5.3.1.1. the Canadian Armed Forces,
 - 5.3.1.2. University of Toronto,
 - 5.3.1.3. McMaster University, and
 - 5.3.1.4. a university-affiliated program in Canada satisfactory to the Board of Assessors.

6. PHYSICIAN ASSISTANT (RESTRICTED PURPOSE) CLASS

6.1. Specific requirements for registration:

- 6.1.1. As with the restricted purpose class for Regulated Members, the Physician Assistant (Restricted Purpose) Class is for the purpose of enabling a PA to engage in practice in Manitoba for a restricted purpose approved by Council. Examples include a public emergency or military service.
- 6.1.2. The specific requirements for registration in the Physician Assistant (Restricted Purpose) Class are set out at section 3.62 of the *CPSM General Regulation*:

⁷ Per section 1.4 of the *CPSM General Regulation*, "PA-C" means the "Physician Assistant – Certified" designation granted by the NCCPA. "NCCPA" means the National Commission on Certification of Physician Assistants in the United States.

⁸ Council does not expressly require PAs to hold the PA-C or CCPA designation to maintain registration. However, it is recognized this may be needed to meet CPSM's continuing competency requirements under Part 10 of the *CPSM General Regulation*.

⁹ The Physician Assistant Certification Council of Canada ("PACCC") is a Council of the Canadian Association of Physician Assistants ("CAPA"). The Physician Assistant Entry to Practice Certification Examination (PA Certification Examination) is recognized by the PACCC. "CCPA" means Canadian Certified PA.

3.62 An applicant for registration as a physician assistant (restricted purpose) member must

(a) establish that he or she is authorized to practise medicine as a physician assistant in another jurisdiction in Canada or elsewhere and is in good standing in that jurisdiction;

(b) submit to the registrar a signed declaration that he or she will engage in the practice of medicine only for one or more of the following purposes:

(i) to provide medical services on a temporary basis at a specified location or facility,

(ii) to conduct a training course or clinical presentation related to his or her professional practice,

(iii) to conduct or engage in a research program related to his or her professional practice,

(iv) to demonstrate equipment or techniques to be used in clinical care related to his or her professional practice,

(v) to provide medical services during a public health emergency as authorized under subsection 56(1) of the Act,

(vi) for any other approved purpose; and

(c) establish that he or she has met any other approved requirements for physician assistant (restricted purpose) membership.

6.2. Terms and conditions on registration:

6.2.1. Section 3.63 of the *CPSM General Regulation* provides:

3.63 A person may be registered as a physician assistant (restricted purpose) member for a time period, geographical area or practice setting specified by the registrar.

6.3. Cancellation of registration:

6.3.1. Cancellation will occur on the earliest of:

6.3.1.1. expiry of the specified period of registration,

6.3.1.2. receipt by CPSM of written notice that the purpose or purposes for which the registration was granted have been fulfilled, or

6.3.1.3. the registrant ceasing to be registered and in good standing as a PA in another jurisdiction in Canada or elsewhere.

7. PHYSICIAN ASSISTANT (ACADEMIC – S. 181 FACULTY) CLASS

7.1. Specific requirements for registration:

- 7.1.1. Section 181 of the RHPA requires CPSM register PAs in the Physician Assistant (Academic – S. 181 Faculty) Class based on a certificate from the Manitoba Faculty when the requirements of that section are met.¹⁰ Section 181 states:

181(1) The registrar must approve an application for registration

...

(b) as a regulated associate member, if the applicant

(i) is granted a certificate by the university in accordance with subsection (2), and

(ii) meets the requirements set out in the regulations.

181(2) The university may grant a certificate under the academic seal of the university to an applicant who meets both of the following requirements:

(a) the applicant is a full-time member of the Faculty of Medicine;

(b) the applicant provides evidence to the university's satisfaction that he or she has passed any examinations required by the university and has met any other requirements of the university.

181(3) A registration may be subject to any conditions that the registrar considers advisable.

- 7.1.2. Section 3.64 of the *CPSM General Regulation* lists other specific requirements for registration in the Physician Assistant (Academic – S. 181 Faculty) Class:

3.64 An applicant for registration as a physician assistant (academic – s. 181 faculty) member must

(a) submit to the registrar a written request to approve the applicant's registration from the dean of the Manitoba faculty (or the dean's designate) that contains the following:

(i) a confirmation that the applicant is or will be legally entitled to work or study in Manitoba before engaging in his or her professional practice,

(ii) a confirmation that the applicant meets the approved English language fluency criteria,

(iii) a description of the applicant's most recent professional practice and proposed professional practice;

and

¹⁰ When registration occurs under this section, the usual common requirements, and non-exemptible requirements under the *CPSM General Regulation* are abrogated.

(b) establish that he or she has been granted a section 181 certificate.

7.2. Terms and conditions:

7.2.1. Section 3.65 of the *CPSM General Regulation* provides:

3.65(1) A person may be registered as a physician assistant (academic – s. 181 faculty) member for as long as he or she holds a section 181 certificate.

3.65(2) As a condition of registration, a physician assistant (academic – s. 181 faculty) member must continue to hold a section 181 certificate.

7.3. Cancellation

7.3.1. The Physician Assistant (academic – s. 181 faculty) Class registrant's membership is cancelled if the member's s. 181 certificate is revoked or lapses.

8. PHYSICIAN ASSISTANT (NON-PRACTICING) CLASS

8.1. The Physician Assistant (Non-Practising) Class is intended for those registrants who take a leave of absence from practice in Manitoba but intend to return to practice in Manitoba. This may occur when a Contract of Supervision is terminated. This class may also be used for those who no longer practice in Manitoba but whose registration has not been cancelled or surrendered. PAs without an approved Contract of Supervision may be placed in this class at the time of initial registration pending authorization of a contract.

8.2. This non-practicing class of registration is to be distinguished from the Retired (Physician Assistant) Class, which is intended for those registrants who have retired from practice. Public registry requirements are lessened in respect to those in the retired class, which is the main difference between the two classes.

8.3. To convert to the Physician Assistant (Non-Practising) Class, the registrant must meet the specific requirements set out at subsection 3.66(1) of the *CPSM General Regulation*:

3.66(1) An applicant for registration as a physician assistant (non-practising) member must establish that he or she was registered or was qualified to be registered as a physician assistant (full) member in good standing immediately before applying for physician assistant (non-practising) membership.

8.4. Council has extended subsection 3.66(1) to include those registered in the Physician Assistant (Academic – S. 181 Faculty) Class.

8.5. As an exception to the usual requirement for an application to convert between classes of registration, section 3.79 of the *CPSM General Regulation* provides:

3.79 If a member fails to renew or voluntarily surrenders his or her certificate of practice, the registrar may change the member's registration to the applicable non-practising class.

8.6. Conversion to the Physician Assistant (Non-Practising) Class will be the usual default for registrants who no longer hold a valid certificate of practice (e.g., if it was not renewed or their Contract of Supervision is terminated), have not expressly indicated an intention to retire, and have not otherwise had their registration cancelled.

9. RETIRED (PHYSICIAN ASSISTANT) CLASS

9.1. Section 3.69 of the *CPSM General Regulation* provides:

3.69 An applicant for registration as a retired (physician assistant) member must establish that he or she was registered in good standing in one of the following classes immediately before applying for retired membership:

- (a) physician assistant (full);*
- (b) physician assistant (academic — s. 181 faculty);*
- (c) physician assistant (non-practising).*

10. CLINICAL ASSISTANT (FULL) CLASS

10.1. Specific requirements for registration:

10.1.1. The specific requirements for registration in the Clinical Assistant (Full) Class are set out at section 3.67 of the *CPSM General Regulation*:

3.67 An applicant for registration as a clinical assistant (full) member must

- (a) complete an approved assessment; and*
- (b) establish that he or she meets one of the following criteria:
 - (i) he or she holds
 - (A) a degree in medicine granted from a nationally approved faculty of medicine, or*
 - (B) a Doctor of Osteopathic Medicine degree from a school in the United States accredited by the***

*American Osteopathic Association Commission on
Osteopathic College Accreditation,
(ii) he or she is a graduate of an approved and accredited
physician assistant or clinical assistant training program
that is restricted to a field of practice,
(iii) he or she is a member in good standing of a regulated
health profession in Manitoba, [or]
(iv) he or she is certified in the highest level of emergency
medical attendant certification at the time of application.*

10.2. Approved Assessments for CIAs:

10.2.1. CIA assessments approved by Council for the purposes of ss. 3.67(a) of the *CPSM General Regulation* are as follows:

10.2.1.1. For CIAs with no field of practice restriction on their registration:

- i. Registered Clinical Assistant assessment offered by the Manitoba faculty.
- ii. National Assessment Collaborative OSCE (NAC-OSCE).
- iii. Hold the LMCC.

10.2.1.2. For CIAs with registration restricted to practice in a specific field of practice:

- i. Satisfactory completion of a program accredited by the Royal College of Physicians and Surgeons of Canada in a Canadian University teaching hospital in the applicant's intended field of practice.

11. CLINICAL ASSISTANT (NON-PRACTICING) CLASS

11.1. The Clinical Assistant (Non-Practising) Class is intended for those registrants who take a leave of absence from practice in Manitoba but intend to return to practice in Manitoba. This may occur when a Contract of Supervision is terminated. This class may also be used for those who no longer practice in Manitoba but whose registration has not been cancelled or surrendered. CIAs without an approved Contract of Supervision may be placed in this class at the time of initial registration pending authorization of a contract.

11.2. This non-practicing class of registration is to be distinguished from the Retired (Clinical Assistant) Class, which is intended for those registrants who have retired from practice. Of note, public registry requirements are lessened in respect to those in the retired class.

11.3. To convert to the Clinical Assistant (Non-Practising) Class, the registrant must meet the specific requirements set out at subsection 3.68(1) of the *CPSM General Regulation*:

3.68(1) An applicant for registration as a clinical assistant (non-practising) member must establish that he or she was registered or was

qualified to be registered as a clinical assistant (full) member in good standing immediately before applying for clinical assistant (non-practising) membership.

11.4. As an exception to the usual requirement for an application to convert between classes of registration, section 3.79 of the *CPSM General Regulation* provides:

3.79 If a member fails to renew or voluntarily surrenders his or her certificate of practice, the registrar may change the member's registration to the applicable non-practising class.

11.5. Conversion to the Clinical Assistant (Non-Practising) Class will be the usual default for registrants who no longer hold a valid certificate of practice (e.g., if it was not renewed or their contract of supervision is terminated), have not expressly indicated an intention to retire, and have not otherwise had their registration cancelled.

12. RETIRED (CLINICAL ASSISTANT) CLASS

12.1. Section 3.70 of the *CPSM General Regulation* provides:

3.70 An applicant for registration as a retired (clinical assistant) member must establish that he or she was registered in good standing in one of the following classes immediately before applying for retired membership:

- (a) clinical assistant (full);*
- (b) clinical assistant (non-practising).*



Contextual Information and Resources

Council Policy Registration of Clinical and Physician Assistants and Physician Assistant Students

The Contextual Information and Resources are provided to support registrants in implementing this Council Policy. The Contextual Information and Resources do not define this Council Policy, nor should it be interpreted as legal advice. The Contextual Information and Resources are dynamic and may be edited or updated for clarity, new developments, or new resources at any time.

Paragraph 1.2. of the Council Policy notes that PA Students do not require a practice description and contract of supervision. Instead, their scope of practice is limited to practice under the supervision of the teaching staff within their educational program. Supervision includes supervising the performance of reserved acts.

Sections 5.18, 5.19 and 5.20 of the *CPSM General Regulation* limit the performance of reserved acts by all students, including PA Students. Section 5.18 provides:

5.18(1) A regulated associate member in an educational class may perform a reserved act only if the member is supervised by a regulated member who is legally permitted and competent to perform the reserved act.

5.18(2) A supervisor referred to in subsection (1) must be physically present and available to assist during the performance of the reserved act.

5.18(3) Despite subsection (2), the supervisor does not need to be physically present if he or she determines that the member does not require that level of supervision. But the supervisor must be available for consultation while the member performs the reserved act.

For reference:

- PA Students are defined as regulated associate registrants in an educational class.
- Regulated registrants include fully and provisionally registered physicians.

Notwithstanding section 5.18, sections 5.19 and 5.20 provide that PA Students may be supervised in performing reserved acts by a licensed PA who is themselves legally permitted and competent to person the reserved act:

5.19 Despite subsection 5.18(1), an educational (physician assistant student) member may perform a reserved act if the member is supervised by a physician

assistant (full), (restricted purpose) or (academic — s. 181 faculty) member who is legally permitted and competent to perform the reserved act in accordance with section 5.20.

5.20(1) A physician assistant or clinical assistant may perform a reserved act only if the assistant

(a) receives authorization from his or her supervisor to perform the reserved act; and

(b) is supervised by a regulated member who is legally permitted and competent to perform the reserved act.

5.20(2) The following definitions apply in this section.

"clinical assistant" means a clinical assistant (full).

"physician assistant" means

(a) a physician assistant (full);

(b) a physician assistant (restricted purpose); or

(c) a physician assistant (academic — s. 181 faculty).

5.20(3) As an aid to the reader, see Part 8 for other provisions relating to physician assistants and clinical assistants.

The Practice Description of a PA who supervises the performance of reserved acts by PA Students should contain related details.