

13 March 2026

NUMBER 49/26

COLLEGE OF PHYSICIANS AND SURGEONS
OF SASKATCHEWAN
TO COUNCIL

FROM: Registrar

SUBJECT: Possible Bylaw 2.4 Amendment
- Licensure of Physicians with International Training

For Your Decision

MEMORANDUM

Date: March 13, 2026

To: Council

From: Bryan Salte/Debra Wright

Re: Possible amendment of bylaw 2.4 (regular licensure)

1. Decision to be made by the Council

The Federation of Medical Regulatory Authorities (FMRAC) and other Colleges of Physicians and Surgeons in Canada are considering reviewing training programs from countries that currently are not approved by either the Royal College of Physicians and Surgeons of Canada or the College of Family Physicians of Canada to determine if those training programs are substantially equivalent to Canadian training programs. That issue is discussed in the summary of the Registration Committee meeting that is attached to this memorandum.

The Registration Committee has recommended that the Council amend the existing bylaw 2.4 to grant licence eligibility to physicians who have completed training programs that have been reviewed by FMRAC or another Canadian regulatory body if the Council also approves the training program.

Council is asked to determine whether it will approve in principle the amendment below. If Council does that, the proposed amendment will be circulated for consultation and the results brought back for the June Council meeting.

2. Overview

The Registration Committee was advised that FMRAC has formed a national project team to build a framework and identify up to four new jurisdictions that could be recognized as substantially equivalent, either in terms of training or outcomes.

College staff is aware that at least two Colleges are considering doing their own review to determine if they will evaluate training programs to determine if they are substantially equivalent to Canadian training programs.

The Registration Committee adopted the following recommendation.

The Registration Committee supported the bylaw amendment proposed within the memo but directed that it be amended to more clearly indicate that the CPSS Council would be reviewing recommendations made by other national expert bodies.

3. Draft resolution

The Council approves in principle an amendment to regulatory bylaw 2.4 to add the following paragraph:

(vii) the physician has completed a training program which the Federation of Medical Regulatory Authorities of Canada or a Canadian medical regulatory authority has concluded is substantially equivalent to a Canadian training program, the Council has approved the training program based upon its conclusion that the training program is substantially equivalent to a Canadian training program, and the physician has achieved certification in their discipline of training in the country in which that training occurred.

4. Drafting principles

The goal of the proposed amendment is to provide licence eligibility to physicians if:

- FMRAC has concluded that a training program is substantially equivalent to a Canadian training program and the Council has reviewed the information and has also concluded that the training program is substantially equivalent to a Canadian training program and the physician has obtained certification in the discipline of their training from that program; or
- A Canadian regulatory authority has concluded that a training program is substantially equivalent to a Canadian training program and the other criteria in the bullet above have been met.

The draft bylaw states that FMRAC's conclusion or another College's conclusion that a training program is substantially similar is not determinative. Both FMRAC and the Council (or the other regulatory body and the Council) must conclude that there is substantial equivalency if an

applicant is to be eligible for licensure based upon completing that training program and achieving certification in their discipline of training in the country in which that training occurred.

The draft bylaw amendment ties programs that CPSS can approve to programs that have been approved by either FMRAC or another regulatory body. I think that provides some degree of protection to the College as it prevents the Council being required to justify a decision that it will not approve a program that an applicant puts forward from a country we know little, if anything, about.

5. Bylaw 2.4 as it will read if the amendment is adopted

The proposed changes from the existing bylaw 2.4 are in red font.

2.4 Requirements relating to regular licensure

The Council may register and issue a Regular Licence to an applicant who produces evidence in a form and manner that may be prescribed by Council that the applicant:

- (a) Meets the requirements applicable to all classes of licences in paragraph 2.3; and,*
- (b) If the applicant has completed postgraduate medical training in Canada, the applicant has:*
 - (i) attained certification by the College of Family Physicians of Canada (CCFP); or*
 - (ii) attained certification by the Royal College of Physicians and Surgeons of Canada (RCPSC) or the Collège des médecins du Québec; or*
- (c) If the physician has completed postgraduate medical training in Canada, the applicant:*
 - (i) has obtained the designation Licentiate of the Medical Council of Canada, and*
 - (ii) has been approved by the Council to participate in an assessment pursuant to bylaw 2.14; and,*
 - (iii) has been successful in the assessment which demonstrates to the satisfaction of the Council that the applicant has appropriate skill, knowledge and suitability to practise independently.*
- (d) If the applicant has completed postgraduate medical training in the United States of America, the applicant has:*
 - (i) attained certification by the College of Family Physicians of Canada (CCFP) or Certification by the Royal College of Physicians and Surgeons of Canada (RCPSC) or certification by the Collège des médecins du Québec; or,*
 - (ii) attained certification from a member board of the American Board of Medical Specialties and has received an independent or full licence or certificate to practise*

- without restrictions in the United States or is eligible for an independent or full licence or certificate of registration to practise without restrictions in the United States; or*
- (iii) met both of the following:*
- 1. successfully completed a period of practice while under a provisional licence: and,*
 - 2. been successful in an assessment which demonstrates to the satisfaction of the Council that the applicant has appropriate skill, knowledge and suitability to practise independently.*
- (e) If the physician has completed postgraduate medical training elsewhere than in Canada or the United States of America:*
- (i) The physician has attained certification by the College of Family Physicians of Canada (CCFP) or certification by the Royal College of Physicians and Surgeons of Canada (RCPSC) or certification by the Collège des médecins du Québec; or,*
 - (ii) The physician has attained certification from a member board of the American Board of Medical Specialties and has received an independent or full licence or certificate to practise without restrictions in the United States or is eligible for an independent or full licence or certificate of registration to practise without restrictions in the United States; or*
 - (iii) the physician has successfully completed a period of practice while under a provisional licence and has been successful in an assessment which demonstrates to the satisfaction of the Council that the applicant has appropriate skill, knowledge and suitability to practise independently; or*
 - (iv) the physician has achieved the SEAP credential and has successfully completed a period of practice while under a provisional licence in accordance with bylaw 2.6 paragraphs (u)(i) and (ii); or*
 - (v) the physician has completed a training program that has been approved through the Approved Jurisdiction Route of the Royal College of Physicians and Surgeons of Canada (RCPSC) and has achieved certification in their discipline of training in the country in which that training occurred; or*
 - (vi) the physician has completed a training program that has been approved by the College of Family Physicians of Canada as a training program that makes the physician eligible to attain CCFP without examination and has achieved certification in family medicine in the country in which that training occurred; or*
 - (vii) the physician has completed a training program which the Federation of Medical Regulatory Authorities of Canada or a Canadian medical regulatory authority has concluded is substantially equivalent to a Canadian training program, the Council has approved the training program based upon its conclusion that the training program is substantially equivalent to a Canadian training program, and the physician has*

achieved certification in their discipline of training in the country in which that training occurred.

6. Attached document

The summary of the Registration Committee meeting

Minutes – Meeting of the Registration Committee

March 9, 2026

Members present:

Dr. Mark Chapelski (Chair)
 Dr. Oladapo Mabadeje
 Dr. Edward Tsoi
 Mr. Femi Ogunrinde
 Dr. Marla Davidson

College representatives present:

Dr. Grant Stoneham
 Dr. Joanna Smith
 Ms. Sheila Torrance
 Ms. Debra Wright
 Mr. Bryan Salte
 Ms. Jennifer Knorr

Regrets:

Dr. Boye Adeboye

The Registration Committee met by videoconference to address the following issues:

Discussion Items
1. To contemplate an additional amendment to Bylaw 2.4(e) to allow the CPSS to recognise future jurisdictions identified.
2. To contemplate the recommendation to cease the collection of references as part of the CPSS registration process.
3. To contemplate a series of recommendations in response to the newly approved FMRAC Common Standard on English Language Proficiency.

SUMMARY OF DISCUSSIONS AND DECISIONS OF THE REGISTRATION COMMITTEE:

Discussion Item #1: Bylaw 2.4 (e) Proposed Amendment

Upon review of the prepared memo, the Registration Committee met to discuss whether it supports the proposed Bylaw 2.4 (e)(vii) and 2.4 (f) to permit the CPSS to issue a Regular Licence to applicants from other jurisdictions that may otherwise be approved beyond that of the Royal College of Physicians and Surgeons of Canada (RCPSC) and potentially the College of Family Physicians of Canada (CFPC).

The Registration Committee was reminded that the CPSS Council very recently approved Bylaw 2.4 (e)(v) and (vi) to permit the CPSS to issue a Regular Licence to those physicians who have completed training programs and have obtained Certification from a Country or Institution that has been recognised as having substantially equivalent training by either the RCPSC or CFPC. This bylaw was enacted on January 30, 2026.

In support of the ongoing healthcare human resource shortage in Canada, the Registration Committee was made aware of work that the CFPC is undertaking to add to its existing list of approved jurisdictions. The CFPC project team has identified New Zealand and France as Countries to bring forward to the CFPC Board in 2026 and be added to the list of jurisdictions that are eligible for *Certification without Examination*.

Unfortunately, the RCPSC has not been as willing to undertake similar efforts to add to their existing list of approved jurisdictions. As a result, a national project team has been formed to build a framework and identify up to four (4) new jurisdictions that could be recognised as substantially equivalent, either in terms of training or outcomes.

One risk highlighted by the CPSS legal counsel was that of discrimination. Human rights legislation prohibits discrimination on the basis of origin and indicated that place of training could be argued as a proxy for place of origin.

The Registration Committee reviewed the proposed bylaw amendment included within the memo and discussed two options:

1. The CPSS Council could make an independent determination whether the training programs of another jurisdiction are substantially similar to training programs in Canada; or
2. The CPSS Council could accept an assessment by third parties whether the training programs of another jurisdiction are substantially similar to training programs in Canada.

FMRAC and other regulatory bodies are possible third parties to make such assessments. Relying on the expertise of others can minimize the risk that the College could be found to be discriminating against individuals whose training was not taken in approved programs.

Recommendations

The Registration Committee supported the bylaw amendment proposed within the memo but directed that it be amended to more clearly indicate that the CPSS Council would be reviewing recommendations made by other national expert bodies.

Next Steps

- The CPSS Legal Team to bring forward an amended bylaw for the CPSS Council to review and potentially approve for consultation at the March 27, 2026 meeting.

Discussion Item #2: Collection of References as evidence of Good Character

Upon review of the prepared memo, the Registration Committee met to discuss whether it would support the recommendation to stop the routine collection of references for all applicants applying for Medical Registration in Saskatchewan.

The Registration Committee discussed the following key points:

- The collection of references is not set out in bylaw but has been a historical practice to assess an applicant's ability to meet the requirements of Good Character, as set out in Bylaw 2.3(a).
- The current CPSS practice has staff routinely collect three references per applicant.

- The collection of references is one of the biggest contributors to delays in the licensure process, outside of the navigating the immigration process and/or awaiting the document verification process for international applicants.
- The majority of Medical Regulators in Canada have stopped the collection of references for Medical Registration (CPSBC, CPSA, CPSM, CPSO, CMQ and Yukon) and others are reviewing their current practices.
- Denying licensure on the basis of a poor reference would be difficult to defend and may not be a suitable or valuable practice for the Medical Regulator.
- The continued collection of a Certificate of Professional Conduct (CPC) serves as the more reliable and objective source of information a Medical Regulator can use to assess a physician's practice and character.

Recommendations

The Registration Committee supported the recommendation for CPSS staff to stop the routine collection of references for all applicants applying for Medical Registration in Saskatchewan.

Next Steps

- This recommendation does not require a bylaw change and therefore does not require Council approval.
- The CPSS Council will be made aware of this decision and that the Registration Department will immediately stop the collection of references and will utilise the CPC as the primary source of evidence to support Good Character and Professional Standing.
- The Registrar, however, will reserve the right to request references, if it is felt necessary as part of assessing the eligibility for licensure of a specific physician.

Discussion Item #3: The new FMRAC Common Standard for English Language Proficiency

The Registration Committee was re-introduced to the now approved FMRAC Common Standard for English Language Proficiency (ELP). The Standard was approved by the FMRAC Board in November 2025.

The Registration Committee was provided an overview of the new Standard and was also re-introduced to the existing Bylaw 2.3 (b) and list of alternate proof acceptable to Council that was introduced in July 2023 and amended in June 2024.

The Registration Committee reviewed how the new Standard has alignment with the current CPSS Bylaws and alternate proof scenarios:

- The CPSS recognises Medical School and Postgraduate training completed in English in Canada as evidence of ELP,
- The CPSS recognises Medical School and Postgraduate training completed in English outside of Canada, with verification from the Institution, as evidence of ELP,
- The CPSS recognises practice in English, as verified by a supervisor beyond the expiry date of an ELP exam, as evidence of ELP,

- The CPSS accepts a pass score on the OET Medicine, IELTS and CELPIP ELP exams as evidence of ELP.

The Registration Committee reviewed the current gaps that exist between the current CPSS Bylaw and Alternate Proof Scenarios and the new FMRAC Common Standard:

- The FMRAC Standard accepts pass scores on Certifying or Qualifying Exams as evidence of ELP. The CPSS currently does not.
- The FMRAC Standard accepts pass scores on ELP exams completed through the immigration process as evidence of ELP. The CPSS currently does not.
- The FMRAC Standard accepts successful completion of a Practice Ready Assessment in English as demonstration of ELP. The CPSS currently does not.

Recommendations

The Registration Committee supported the following recommendations:

- To remove all reference to 'other countries that are identified by the Federation of Medical Regulatory Authorities of Canada as having English as a first or native language', from Bylaw 2.3 (b) (and where required, alternate proof scenarios), given this reference is no longer valid.
- To retain the five-year durability requirement outlined within the CPSS's current acceptable alternate proof to recognise ITPs who have received primary and/or secondary medical training instruction in English.
- To not accept pass scores on certifying or qualifying exams as evidence of ELP, as an exam does not fully assess competency across all four of the professional activities listed within the new Standard.
- To not accept a pass on a language test set by Immigration, Refugee and Citizenship Canada (IRCC). The exams currently utilised by the IRCC do not assess English language proficiency at the level of the exams currently accepted by the CPSS.
- To support the FMRAC resolution that "*the licensure requirement to demonstrate proficiency in English is fulfilled if the applicant provides proof that they currently hold a medical licence in any province or territory in Canada and demonstrates they practise primarily in English.*"

The Registration Committee supported the following recommendations with modifications noted in **Red**:

- To accept a successful Practice Ready Assessment conducted in English **within 5 years of licensure application**, as demonstration of English language proficiency across all domains of reading, writing, listening and speaking and all four professional activities listed in the new Standard.

The Registration Committee did not support the following recommendations:

- To amend the current CPSS Bylaw and alternate proof scenario to accept proof of practice in English without evidence of a prior ELP Exam pass.

The Registration Committee provided direction that a prior ELP Exam pass should remain a requirement, for consideration of accepting practice in English.

Next Steps

- The CPSS Legal Team will bring forward a draft amendment to Bylaw 2.3(b) and revised language to the list of alternate proof of ELP scenarios for the March 27, 2026 Council Meeting, based on the above recommendations.