



College of Physicians and Surgeons of British Columbia

Registration Policy

Considerations of Exceptional Circumstances for Registration

PURPOSE

The purpose of this policy is to provide guidance on the circumstances that may be considered by the Registration Committee as exceptional in relation to the extension of the time periods for meeting registration requirements as referenced in section 2-17 of the College Bylaws under the *Health Professions Act (HPA)*.

BACKGROUND

The *HPA* authorizes the Registration Committee to require that all provisional registrants meet their examination and certification requirements within prescribed time periods set out in section 2-17 of the Bylaws. In certain situations, the Registration Committee is afforded discretion to extend the prescribed time period where exceptional circumstances exist.

Section 2-17 of the Bylaws states:

Provisional – registration requirements

- 2-17 (1) A registrant granted provisional registration must
- (a) meet the conditions set out in Part 2 of these bylaws, in addition to any limits or conditions the Registration Committee imposes under section 20(4.3) of the Act,
 - (b) if a family practitioner,
 - (i) within five years of commencing practice in British Columbia, become a licentiate of the MCC, and
 - (ii) within five years of commencing practice in British Columbia,
 - (A) obtain certification with the CFPC by examination, or
 - (B) within one year of commencing practice in British Columbia, obtain certification with the CFPC without examination based on recognition of training and certification obtained in international jurisdictions as determined by the CFPC,
 - (c) if a specialist,
 - (i) within five years of commencing practice in British Columbia, obtain RCPSC certification in his or her primary specialty, and
 - (ii) if he or she has completed accredited postgraduate training in Canada, acceptable to the Registration Committee, be a licentiate of the MCC within five years of commencing practice in British Columbia, failing

which registration is cancelled unless otherwise directed by the Registration Committee as provided under subsection (2).

- (2) The time periods referred to in sections 2-17(1)(b) and (c) may be extended by the Registration Committee in exceptional circumstances.
- (3) Registration in the provisional – family or provisional – specialty class may be granted for a limited duration not to exceed five years unless otherwise directed by the Registration Committee in exceptional circumstances.

POLICY

A provisional registrant who is unable to meet the requirements set out in section 2-17 of the Bylaws and who believes that there are exceptional circumstances for not being able to do so may make a request to the Registration Committee for consideration of those circumstances.

For the purposes of considering a request of this nature, exceptional circumstances are deemed to be those events or situations that are unusual or not typical and only likely to happen infrequently and must be relevant to the registrant not being able to meet the registration requirements set out in the *HPA* and Bylaws.

Examples of valid exceptional circumstances

The following is a non-exhaustive list of circumstances which may, at the discretion of the Registration Committee, be regarded as exceptional circumstances falling within the definition described above:

- death of a close relative/significant other (as supported by valid evidence)
- serious illness of the registrant, family member or person for whom the registrant is the primary caregiver (as supported by valid evidence from a medical professional or a report of the College's health monitoring department, where appropriate)
- victim of crime
- the worsening of a long-term physical or mental health condition, or the complication/aggravation of an existing condition (as supported by valid evidence from a medical professional or a report of the College's health monitoring department, where appropriate)
- serious adverse personal, professional or family circumstances, where not known at the start of registration
- pregnancy-related complications
- where a registrant, prior to January 26, 2015, chose the Practice Eligibility Route (Route B) as the preferred route to obtain RCPSC certification in their specialty, but the same is unavailable in a particular specialty

The above circumstances may not in and of themselves be considered exceptional in nature. The Registration Committee will consider each case on its merits and the specific factors surrounding the situation.

Valid as used in the term "valid evidence" above requires objectively verifiable documentary evidence or information from a generally accepted authority.

Evidence required for exceptional circumstances

Applications for exceptional circumstances to be considered must be accompanied by valid evidence of those circumstances. Such evidence should normally be independent third-party evidence (e.g. a medical professional, counsellors, police, etc.), verifiable (confirmed by an official person and/or organization), and relevant (linked directly to the timing and circumstances of the claim).

Circumstances that are unlikely to be valid exceptional circumstances

Generally, those circumstances over which the registrant has control are unlikely to be regarded as exceptional circumstances. Examples of such circumstances include the following:

- inadequate planning and poor time management
- mistaking a deadline
- holidays
- claimed circumstances for which appropriate adjustments have already been made (e.g. a disability for which reasonable adjustments have been made or where the registrant has experience or time to manage the situation)
- long-term health condition for which the registrant is already receiving reasonable or appropriate adjustments
- statement of a medical condition without reasonable evidence
- stress and panic attacks caused by exams that are not diagnosed as an illness and supported by reasonable evidence
- insufficient scores on examinations
- pregnancy
- general financial problems
- child care problems that could have been anticipated
- any event that could reasonably have been expected or anticipated

The College's mandate obliges the Registration Committee to place patient safety above all other consideration and this includes ensuring that physicians meet expected requirements for ongoing registration and standards of practice and conduct. Citing that an interruption in registration will have an adverse impact on patients and the communities is not regarded as an exceptional circumstance. It is not within the College's purview to ensure that there are adequate physician resources in the communities and it is strongly emphasized that sufficient time be reserved for preparation of such licensing and/or certification examinations given its critical role in eligibility for continuing licensure.

Effective May 3, 2019