



**Regulation Matters:  
a CLEAR conversation**

## **Episode 66: Decreasing Application Processing Time While Maintaining Accuracy June 13, 2023**

**Line Dempsey:** Welcome back to our podcast, Regulation Matters: a CLEAR conversation. Once again, I'm your host, Line Dempsey. I'm currently the chief compliance officer with Riccobene Associates Family Dentistry here in North Carolina and Virginia, and I'm also CLEAR's President for the 2022-2023 membership year.

As many of you are aware, the Council on Licensure, Enforcement and Regulation, or CLEAR, is an association of individuals, agencies, and organizations that comprise the international community of professional and occupational regulation. This podcast is an opportunity for you to hear about important topics in our regulatory community.

One issue that a lot of regulators are grappling with is license application processing time. We're facing pressure from applicants, government, and even the media to reduce processing time while not sacrificing accuracy and quality. Some organizations are working through ways to handle this issue. Joining us today is Jennifer Best, director of standards and guidance and customer experience with the Nova Scotia College of Nursing. Jennifer, you joined us for one of our inaugural episodes of the podcast back in 2018, and we're very glad to have you back with us again today.

**Jennifer Best:** Thanks so much for the invitation to be back on the podcast and share with everyone the exciting work that's happening here in Nova Scotia.

**Line:** That's excellent. Well, I understand, speaking of Nova Scotia, that the College of Nursing has recently made changes to the licensure process for internationally educated nurses to make it easier for those nurses to start practicing in Nova Scotia. So maybe first, can you kind of set the background for maybe how things were leading up to these changes? You know, how many internationally educated nurses does your College deal with, and what was the license process for them initially?

**Jennifer:** Thanks so much for the question. So, the Nova Scotia College of Nursing, just to give you some background of who we are and what we do- we regulate the practice of over 16,000 licensed practical nurses, registered nurses, and nurse practitioners here in Nova Scotia. Our mandate is to

protect and serve the public interests of Nova Scotians. And every year we have hundreds of inquiries from international nurses who are seeking registration and licensure here in Nova Scotia. In 2022 up to last year we licensed over 280 of those nurses which, in fact, was more than the previous three years combined. So, we had been making some changes to our processes to enable more nurses.

Prior to May 1st of this past year, 2023, all international nurses who were not registered and licensed in another Canadian jurisdiction, were required to engage in a 2-step process to be registered and licensed with NSCN. The first step was to apply to the National Nursing Assessment Service, which for an acronym is NNAS. And they would obtain through NNAS an advisory report. Once they received the report, they could then apply to us. We would assess their application and the advisory report and make a licensing decision at that point.

The process change that I'm going to talk to you about today has enabled international nurses that are licensed in seven designated countries to apply directly to NSCN, making this a 1-step process. So rather than have to go to NNAS first, and then to us, they will apply directly to us.

**Line:** So, what spurred this on, for you to take a look at these processes and policies? Was it Covid? I hate to say that word. But, you know what was the impetus for this?

**Jennifer:** Yeah. You know, like many other regulators around Canada, the US, and other places in the world, since the pandemic, since Covid, we've really been facing a consistent pressure to evaluate and reevaluate processes to get more nurses into the system. And we have made some significant changes, as I mentioned You know we were able to get more international nurses than in the three years combined last year. But it became evident to us that more was needed. Our government went on record as saying that they needed to add at least 1,500 more nurses into our system and our small province here in Nova Scotia. And so, we really thought, you know we need to push ourselves and we need to look at our data, our registration licensing data, to determine how we can streamline some of the processes that we have to get more qualified nurses into the health system here in Nova Scotia.

And that's what we did. We did a deep dive into our data to determine what we could do to increase the nursing supply safely here in Nova Scotia. We assessed data from nearly 10 years of applicants and their NNAS reports. We reviewed nationalized curriculum, entry-level competencies, and success rates on their licensing exams. And this analysis is really what informed our policy change that I'm going to tell you about.

**Line:** Well, that's a great segue to my next question, which is, what kind of key process and policy changes did you actually make?

**Jennifer:** So, we actually made two significant changes as part of our work at the College to establish a fast and predictable pathway to licensure here in Nova Scotia. Both changes are predicated on the fact that the nurse is in good standing in the jurisdiction that they're currently licensed in. So, good standing means the nurse is not subject to any outstanding complaints with their current regulator

and there are no prohibitions, conditions, agreements, or restrictions on their license or registration with their current regulator that would prevent them from registration with NSCN. So, the 'in good standing' is a really important piece of these policy changes.

So, the first change that we implemented happened on March 29th of 2023, and that change was nurses that were licensed in other Canadian jurisdictions, who demonstrated good standing and good character, were eligible for registration and licensure in Nova Scotia immediately, with no additional requirements. This is not specific to international nurses, but it has proven to increase the interest in other applicants coming from Nova Scotia. So, we definitely have received interest in that process and more applications through that policy change.

So, the second very significant change that we made was implemented on May 1st of 2023, and that change was registered nurses who demonstrated good standing and good character and who are licensed in the Philippines, India, Nigeria, the United States, the UK, Australia, or New Zealand would be eligible for registration and licensure in Nova Scotia immediately, with no additional requirement beyond the submission of the application other than passing the entrance exam.

These international nurses could choose to go down the LPN or the RN pathway to licensure. If they choose the RN pathway, they'll have to write the RN national licensing exam, which is the NCLEX, and if they choose the LPN pathway, they'll need to write the LPN national licensing exam, the CPNRE.

International nurses who have completed their entry-level programs and established licensure and registration in one of those seven designated countries that I spoke of will have been deemed to have met the English language requirement. Our goal is to expediate the process. However, nurses with a positive discipline history or issues on a criminal record check may not qualify for this process. It's important to note, as I've already mentioned, this whole process is predicated on the fact that these nurses must be in good standing in their current jurisdictions.

If the applicant has not passed the applicable exam, so the national exam for the RN or LPN licensure, they will be eligible for what is known as a conditional license. Once the conditional license is issued, they will be able to begin practicing as a nurse here in Nova Scotia. That conditional license is valid for 12 months or until three failed attempts to pass the applicable exam, and then they wouldn't be eligible at that point.

**Line:** A couple of quick questions on that. Is there any requirement for them to have had their license for a certain period of time prior to that process, for either the Canada crossover, if you would, or the seven international?

**Jennifer:** No, in Canada, they just need to be licensed and registered in a Canadian jurisdiction, or they would have to be licensed or registered in one of the jurisdictions that I mentioned, those seven countries.

**Line:** Okay, I was gonna say, just out of curiosity - the processing time obviously is sped up significantly. Is there still some paperwork? Obviously for going across all your provinces, is it just a paperwork time? And you know, how quickly are they actually getting the license in that process? I'm just curious.

**Jennifer:** So, for the first policy change that we made for nurses who are currently licensed and registered within Canada, they will receive their Nova Scotia license within five days. That's our plan. But generally it's within 24 business hours. That's what we aim to do. But we have committed to the five-day window.

**Line:** Wow, that's fantastic!

**Jennifer:** For the international nurses, it's taking a significant amount more time, and that is generally due to the ability to get documents as well as the sheer number that we've seen since we've made this policy change.

**Line:** Wow! That's fantastic. So, are you making sure that you're maintaining accuracy and quality? How are you doing that when you're dealing with, you know such volume as you're mentioning there, too? And also these windows of time that you're trying to get them turned around.

**Jennifer:** Yeah. So, you know that's very important and is a keystone in this policy change that we made—to ensure that we had processes or safeguards in place to make sure that we weren't sacrificing quality and that we were safely putting nurses into the system. So firstly, you know, our analysis of those 10 years of NNAS advisory reports, the national curriculum, the entry-level competencies, and the success rates on the exams gave us the confidence that the nurses from those seven identified countries have been educated to an RN scope of practice that is like that of a scope of practice here in Nova Scotia. We concluded based on the analysis of that data that nurses from the UK, the US, Australia, and New Zealand are educated to that scope of practice that's comparable to the Nova Scotia nurse.

We did take a deeper dive and looked at the curriculum and entry-level competencies of the programs in the Philippines and in India. And what we found was that their education program has prepared them to work to the scope of practice that's comparable to that of a Nova Scotia nurse. In Nigeria, we did an even deeper dive and looked at their NNAS advisory reports that focused on the most critical attributes. And we looked at overall pass rates on the national exam, and from that, we were confident that those nurses are prepared with the core scope of practice that's comparable.

So that data really gave us the confidence that our process change was a safe process change.

Some of the other safeguards we've put in place to maintain our quality in this new policy change is that all applicants still have to pass the entrance exam. And that entrance exam is in English, and that would demonstrate that they have those individual competencies that are required to practice here in Nova Scotia. They can get into practice with that conditional license, but there are conditions on their

license while they're practicing.

Again, as I mentioned earlier, they must be in good standing. So, the nurse must not be subject to any outstanding complaints with their current regulator, and there must not be any restrictions on their license that we would see.

Another safeguard we put in place is that applicants who have established licensure in, but were not educated in, one of the seven designated countries may be eligible for the process, but they may need to submit to evidence of meeting an English language requirement. So, we want to ensure that they're meeting our English language requirement. We have confidence that the nurses that were educated in those seven countries would meet the English language requirement. So, if they weren't educated there, they may need to submit evidence of that.

The other thing we've done is we've really worked closely with our government partners and our partners within the health system. And the government of Nova Scotia, as well as the health system, have put a number of supports in place to help welcome, support, and transition these nurses into practice. And so, we're confident that that will assist them in being successful in the practice environment.

Additionally, any evidence or documents that we require as part of licensure must come to NSCN directly from the source, the jurisdiction from which the nurse holds the license. And this additional safeguard helps protect against any fraudulent documents. So that's another thing we put in place. So, we tried to make sure that we put enough processes in place that we were maintaining the quality of the nurses that we're going to be licensing.

**Line:** I can't help but think that there's a diverse population that's potentially coming in, you know, with these seven different countries. So, do you think that that has some impact on your citizens? And how so? How would you measure it?

**Jennifer:** You know, this is really good news for Nova Scotians. We honestly didn't know how well this was going to be received, but to-date we've received over 11,000 applications from international nurses. You know, it's important to know that many of these individuals may not arrive here in Nova Scotia, but at least they've submitted an application. They've paid their fee, and for us, that signals their intent to want to come.

So, we're working our way through those applications and registering and licensing nurses who are qualified, and we're continuing to add additional staff to our complement here at the College to able to process those applications.

One of the things we've also done, when you talk about diverse populations and adapting to life here in Nova Scotia, is we've helped to develop a task force with key system partners here in Nova Scotia who have accountability and responsibility in immigration, settlement and recruitment and in

retention of international nurses. Those are key processes that, although NSCN doesn't have influence over, we've created that partnership with those key partners to ensure that those things were going to be looked at for these international nurses who are coming to Nova Scotia. We really want to work with our system partners to ensure that once they're here, that they're going to stay. You know, that it's a welcoming environment and they're going to be able to stay here.

You mentioned evaluation. And we have developed a robust evaluation plan to measure the impact that this policy change has made on both our process and our outcome indicators. And we'll be excited to be measuring these and sharing these results with everyone as they come.

**Line:** Well, I know this is still relatively fresh and new - March and May - so, what kind of lessons have you learned from this experience that you can maybe share with other regulators that are facing this pressure to decrease their processing time?

**Jennifer:** Yeah, for sure. And you're right, we're learning new lessons on a daily basis. So up to this point, I think the number one lesson that I'd like to share, our message that I'd like to get out there, is that we recognized that we could and we should apply the equity, diversity, and inclusion principles that we developed as an organization to the licensing process. I would really encourage other regulators to evaluate their processes through an EDI lens and ask yourself hard questions to assist you to reflect on what your current processes are from an EDI lens.

We looked outside the box for solutions. I know that sounds like a cliché, but it is true. I'd encourage others not to limit yourself by doing something just because it's the way you've always done it. We're in a new place, in a new time, and it requires new and innovative solutions.

You know, we had redundancies in our processes and we recognized that. So, I would encourage others to look for redundancy or duplication in the processes that you're doing.

And lastly, but certainly not the least important, we recognized we had a ton of data related to our registration licensing processes. And there was a story in our data, and we needed to listen to that story. I would really encourage others to use evidence to guide their decision-making when it comes to making policy changes around registration and licensure.

**Line:** Well, that's excellent. Well, it's been great to hear how your organization is implementing this approach to decreasing the time. I mean again, the 24-hour time period and five days for just across your provinces is fantastic. So certainly excited for that for you, and certainly want to thank you for speaking with us today, Jennifer.

**Jennifer:** Thanks so much for having me. It's always a pleasure to participate in Regulation Matters, a CLEAR podcast, and I look forward to the next time we can sit down and discuss regulation.

**Line:** Absolutely. Well, it's been our pleasure. And we'd like to continue this conversation. So here are

some questions for listeners to think about. Are you facing pressure or mandates to decrease licensure application processing time? What solutions have you tried or would you be interested in trying? And how can you save time without lowering quality? We really think that our members can benefit from this kind of feedback. So, we've recently launched our new regulatory network platform and questions like these will be posted there for member feedback and discussion. If you haven't already joined the CLEAR Regulatory Network, we invite and encourage you to join and take part in our online discussions.

I also want to thank our listeners for tuning in for this episode. We'll be back with another episode of Regulation Matters: a CLEAR conversation very soon. If you're new to the CLEAR podcast, please subscribe to us. You can find us on Podbean or any of your favorite podcast services. And if you've enjoyed this podcast episode, please leave a rating or comment in the app. Those reviews help us to improve our ranking and make it easier for new listeners to find us.

Feel free to also visit our website at [www.clearhq.org](http://www.clearhq.org) for additional resources and a calendar of our upcoming programs and events. Finally, I'd like to thank our CLEAR staff, specifically Stephanie Thompson. She is our content coordinator and editor for this program. Once again, I'm Line Dempsey, and I hope to be speaking to you again very soon.

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