MUTUAL RECOGNITION AGREEMENT FOR THE PROFESSION OF DENTISTRY IN CANADA WITH RESPECT TO GENERAL DENTISTRY AND DENTAL SPECIALTIES MADE THIS 10TH DAY OF JULY, 2009

DEFINITIONS

In this Agreement unless the context otherwise requires:

"Accredited General Dentistry Program" means a university based dental program accredited by the CDAC or accredited under the terms of an agreement between the CDAC and the CODA/ADA that is not an Accredited Specialty Program and which results in the award of a doctor of dental surgery, doctor of dental medicine or equivalent degree;

"Accredited Specialty Program" means a university based Dental Specialty program accredited by the CDAC or accredited under the terms of an agreement between the CDAC and the CODA/ADA;

"Applicant" means a dentist who currently holds General or Specialty Licensure with at least one DRA and who is seeking General or Specialty Licensure with another DRA;

"Canadian Dental Regulatory Authorities Federation / Fédération canadienne des organismes de réglementation dentaire" shall be hereinafter referred to as the "CDRAF/FCORD";

"Certificate of Completion - Specialty Practice" means a certificate evidencing the

successful completion of a program approved by all of the members of the CDRAF [currently pursuant to the Memorandum of Understanding for Internationally Trained Dental Specialists dated October 12, 2007, Appendix A] thereby evidencing that the Applicant possessed knowledge, skill and judgment at least equivalent to a current graduate of an Accredited Specialty Program;

"Commission on Dental Accreditation of the American Dental Association" shall be hereinafter referred to as the "CODA/ADA";

"Commission on Dental Accreditation of Canada" shall be hereinafter referred to as the "CDAC";

"Dental Regulatory Authority" shall be hereinafter referred to as "DRA" and means a provincial authority responsible for the regulation of dentistry in a province in Canada;

"Dental Specialist" means a dentist who is registered as a specialist with one of the DRA's:

"Dental Specialty" means one of the recognized dental specialties by one or more of the DRA's.

"Dentist" means a person holding a general licence with a DRA;

"General Licence" means a licence, permit, certificate or registration which permits a dentist to practise dentistry and to hold himself/herself out as a dentist in a province of Canada;

"General Licensure" means possession of a General Licence;

"National Examination for general dentistry" refers to a national examination for general dentistry approved by the CDRAF (currently administered by the NDEB);

"Good Standing" refers to the status of a person who currently holds Licensure and means that the person's licence is not encumbered or restricted in any way and, more specifically, is not subject to a discipline or fitness to practise order or ongoing investigation or interim order or agreement, as a result of a complaint, investigation or proceeding.

"International Dentistry Program" means a university based undergraduate dentistry program that is not an Accredited General Dentistry Program but that does result in the award of a doctor of dental surgery, doctor of dental medicine or equivalent degree;

"International Specialty Program" means a university based Dental Specialty program that is not an Accredited Specialty Program;

"Licensure" means the possession of a General or Specialty Licence (permit, certificate or registration);

"Memorandum of Understanding for Internationally Trained Dental Specialists" means that Memorandum of Understanding entered into by the DRA's as members of the CDRAF (Appendix A);

"National Dental Examining Board of Canada" shall be hereinafter referred to as the "NDEB";

"Non-Restricted" when used with the term General Licence, General Licensure, Specialty Licence, Specialty Licensure or Licensure" means without any restrictions, terms, conditions or limitations

- (a) relating to the holder's ability to practise independently;
- (b) requiring the holder to practise under supervision or direction;
- (c) requiring the holder to maintain a position or appointment as a condition of continued Licensure;

- (d) restricting the holder to a temporary or time limited licence or practice;
- (e) imposed by a DRA or any committee or panel of a committee of a DRA as a
 result of a disciplinary, registration or fitness to practise proceeding; or
- (f) placed on the licence by agreement between the holder and a DRA

but a Specialty Licence whose only restriction is to limit the Applicant's practice to his/her Dental Specialty shall be considered Non-Restricted;

"Royal College of Dentists of Canada" shall be hereinafter referred to as the "RCDC";

"Specialty Licence" means a licence, permit, certificate or registration which permits a dentist to practise his/her Dental Specialty and to hold himself/herself out as a Dental Specialist in a province of Canada;

"Specialty Licensure" means possession of a Specialty Licence; and

"National Dental Specialty Exam" means the examination administered by the RCDC or such other body approved by the CDRAF to Applicants who have either graduated from an Accredited Specialty Program or obtained a Certificate of Completion – Specialty Practice;

PURPOSE

We, the undersigned, enter into this Agreement in order to establish a set of common requirements for Licensure in any province in Canada and to thereby facilitate mobility across Canada of dentists holding General or Specialty Licensure, or both.

- 1. The parties agree that the following statements are correct:
 - (a) The requirements for Licensure are the responsibility of each DRA.

- (b) Each DRA carries out its Licensure duties in accordance with its legislative mandate and in good faith.
- (c) No DRA has residency requirements for Licensure.
- (d) General dentistry and each Dental Specialty have a common fundamental scope of practice across Canada.
- (e) There have been, and in some cases continue to be, differences in the processes used by each DRA to establish to its satisfaction that an Applicant is qualified to obtain Licensure.
- (f) The parties hereto have identified the following fundamental criteria as necessary to demonstrate the competency required to achieve General Licensure through:
 - A. (i) Accreditation
 - a) Accreditation through CDAC;
 - b) Accreditation by a CDAC recognized accreditation
 - (ii) Examination (or series of examinations)
 - Must be psychometrically sound, i.e. each examination is established to be reliable, valid and sustainable;
 - b) Must be substantially equivalent to the proposed assessment process (Appendix B);
 - (iii) Mutual recognition process
 - Must assess substantial equivalence of education programs to those accredited by CDAC
 - b) Must be a bona fide, fair, transparent, objective and ongoing process; and

- B. Successful completion of the national examination for general dentistry
- (g) The parties have identified the following fundamental criteria as necessary to demonstrate the competency required to achieve Specialty Licensure:
 - (i) either
 - 1. graduation from an Accredited Specialty Program; or
 - graduation from an International Dental Specialty Program and a Certificate of Completion – Specialty Practice; and
 - (ii) successful completion of the National Dental Specialty Examination.
- (h) In some provinces or territories there are dentists registered with Non-Restricted General and/or Specialty-Licensure who have not completed the General Practice or Specialty Examination.
- 2. Subject to the terms of this Agreement, each of the parties agrees
 - (a) to recognize, without further competency training or competency examination, an Applicant who currently holds Non-Restricted General Licensure with a DRA where that Licensure was obtained prior to the date of this Agreement;
 - (b) to recognize, without further competency training or competency examination, an Applicant who currently holds Non-Restricted Specialty Licensure with a DRA where that Licensure was obtained prior to the date of this Agreement;

- (c) to recognize, without further competency examination, an Applicant who holds Non-Restricted General Licensure with a DRA obtained after the date of this Agreement in accordance with one of the processes outlined in 1(f) to grant that Licensure.
- (d) to recognize, without further competency examination, an Applicant who holds Non-Restricted Specialty Licensure with a DRA obtained after the date of this Agreement in accordance with one of the processes outlined in 1(g).
- (e) that an Applicant may be required to meet other requirements as a condition of Licensure, namely:
 - The completion of an application and the providing of supporting documentation.
 - Satisfying the DRA from which the Applicant is seeking Licensure that the Applicant is in Good Standing.
 - Satisfying the DRA from which the Applicant is seeking Licensure that
 the Applicant has complied with the continuing competency/quality
 assurance requirements of the DRA(s) with which the Applicant
 currently holds Licensure.
 - Satisfying the DRA from which the Applicant is seeking Licensure that
 there is no evidence of ineligibility or inability to meet that DRA's
 requirements for continuing competency/quality assurance.
 - Payment of fees to the DRA from which the Applicant is seeking Licensure.

- Successful completion of a course(s) or examination(s), or both, dealing
 with ethics and jurisprudence as may be required by the DRA from
 which the Applicant is seeking Licensure.
- 7. Satisfying the DRA from which the Applicant is seeking Licensure that the Applicant's past and present conduct affords reasonable grounds for the belief that the Applicant:
 - is mentally competent and physically able to safely practise dentistry;
 - (ii) demonstrates good character
- Satisfying the language requirements of the DRA from which the Applicant is seeking Licensure.

IMPLEMENTATION

- 3. In order to implement the intent of this Agreement, each of the parties agrees
 - (a) to use its best efforts and take such action as is necessary to revise its registration requirements to ensure that
 - (i) no Applicant for initial General Licensure from that DRA shall receive a Non-Restricted General Licence unless the Applicant has met the fundamental criteria set out in paragraph 1(f); and
 - (ii) no Applicant for initial Specialty Licensure from that DRA shall receive a Non-Restricted Specialty Licence unless the Applicant has met the fundamental criteria set out in paragraph 1(g); and

- (b) subject to paragraph 4, to provide to any DRA to which the Applicant has applied for Licensure, upon receipt of a written consent signed by the Applicant, any and all information in the DRA's possession or control respecting the Applicant including but not limited to
 - documents and details respecting any complaint, investigation or hearing whether or not it resulted in the DRA taking any action against or imposing any sanctions upon the Applicant;
 - (ii) any other document or details of which could be considered relevant by a DRA in determining whether the Applicant has met the requirement set out in paragraph 2(e).
- 4. For the purposes of paragraph 3, each of the parties agrees that
 - (a) the information provided under paragraph 3 may be redacted to eliminate any personal health information or other confidential information relating to a person other than the Applicant on the understanding that no more than is necessary to protect that personal health or confidential information shall be hidden;
 - it will use its best efforts to establish a common form of consent which all parties can accept; and
 - (c) where any party is unable or unwilling to accept the form of consent provided by another party, that party will immediately provide to the party which is requesting the information a form of consent which if signed by the Applicant would allow the party to meet its obligations under paragraph 3(b).

- Where implementation of this Agreement requires action by a provincial or territorial government, the DRA agrees to seek the legislative, regulatory and/or bylaw amendments necessary to give effect to the terms of this Agreement.
- 6. The parties agree that this is a dynamic agreement that will develop, change and may be amended over time, as required by circumstances. The parties therefore agree to initiate a review of this Agreement at the request of any one or more of the DRA's.
- 7. Any proposed changes to professional practice standards, licensing or legislative requirements that may impact this Agreement will be promptly communicated in writing to the CDRAF and all other DRA's in order to provide each of them with an opportunity to review and comment prior to implementation.
 - 8. If a party is required by law not to comply with any portion of this agreement, that party shall provide notice in writing to the CDRAF and all other DRA's as soon as is reasonably practicable providing the reasons why they were unable to comply with the Agreement;
 - The parties to this Agreement maintain the right to accept further signatories to the Agreement at any time in the future.
- 10. A party to this Agreement may withdraw from it after providing to the CDRAF and all other parties twelve (12) months written notice of its intention to do so and the reasons for its decision to withdraw.
- The parties agree that this Agreement may be signed in counterparts.

Signatories to the Agreement

Per:	Signed this 20th day of Otoh, 2009
Alberta Dental Association and College Per: Scholege Per: Per: Per: Per: Per: Per: Per: Per:	Signed this 29 day of Octobe 2009
Per: Auch Joilo Per: Archive Decide D	Signed this 29 day of Etaber, 2009
Manitoba Dental Association sweet removed of Per: (1. Manh) Drub Per: Manh) Dan Wan l, Regishar	Signed this 29 day of October 2009
Royal College of Dental Surgeons of Ontario	Signed this 29 day of South, 2009
Ordre des dentistes du Québec Per: Walle Gladet Per: Manuel Gladet Per	Signed this 27 day of Other, 2009

New Brunswick Dental Society Per: Per:	Signed this <u>22</u> day of <u>April</u> , 2009 2010
Provincial Dental Board of Nova Scotia Per: Per:	Signed this 29 day of 0 1, 2009
Dental Council of Prince Edward Island Per: Per:	Signed this 29 day of Oct., 2009
Newfoundland and Labrador Dental Board Per Auctor	Signed this 29 day of Oct, 2009



CDRAF/FCORD Final Document - October 12, 2007

MEMORANDUM OF UNDERSTANDING

With respect to a uniform Canadian process for the certification and licensure/registration of internationally trained dental specialists

- The members of the CDRAF/FCORD are committed to the following fundamental principles:
 - Ensuring that a primary mandate is to regulate dentistry in the public interest by licensing/registering only competent and qualified individuals.
 - The process for assessing internationally trained dental specialists is fair, transparent, impartial and objective.
 - Working collaboratively to mount a process for internationally trained dental specialists that has nationally agreed to standards, programs and outcomes thus ensuring labour mobility of credentials.

2. Definitions

- Internationally Trained Dental Specialist ("Applicant") means a dentist who
 graduated from a university/hospital based post-graduate dental specialty training
 program that was not accredited by the Commission on Dental Accreditation of
 Canada ("CDAC") or the American Dental Association's Commission on Dental
 Accreditation ("CODA") through the terms of a reciprocal agreement.
- 2. Dental Specialty means a nationally recognized dental specialty in Canada.
- 3. **Process** means the mechanism by which an applicant establishes the necessary qualifications and competencies to be licensed/registered as a certified dental

specialist or certified dental specialist restricted to specialty in a Province or Territory of Canada.

- 4. Credential Assessment means that portion of the Process administered by the Association of Canadian Faculties of Dentistry ("ACFD") whereby an applicant's eligibility to enter the Program is determined. The ACFD shall be responsible for the verification and evaluation of the applicant's credentials by methods such as, but not limited to, reviewing the applicant's documentation, training, case histories, experience, English/French language proficiency tests, personal interview and/or other means deemed necessary.
- Dental Specialty Core Knowledge Examination ("DSCKE") will be developed and administered by the ACFD (in cooperation with the NDEB) as an admissions requirement for the Programs provided by the Faculties/Schools.
- 6. Program means the knowledge and clinical assessment of an applicant and, if necessary, the gap training portion of the Process as administered by an accredited Canadian Faculty/School of Dentistry that either has, or is affiliated with, an accredited specialty program in the specialty being sought. Those schools requiring affiliation with an accredited program require their participation to be part of the CDAC review of the accredited university.

The assessment phase of the Program is part of the university's student admissions process and shall include a clinical and didactic component and shall determine, having regard for the CDAC curriculum requirements, whether the applicant has the knowledge, skill and judgment equivalent to the standards set to graduate a student from a CDAC accredited dental specialty program or whether the applicant has deficiencies that can be corrected within one year (including the time taken for the assessment). The assessment phase of the Program shall not exceed three (3) months. Acceptance into the assessment phase does not mean that gap training will be provided. Placement in this respect will be limited according to the resources of the Faculty/School to which the applicant applies.

 Certificate of Completion/Equivalency means the certificate issued by the participating University/School to an applicant who has successfully completed the Program portion of the process. The certificate entitles the applicant to apply to the Royal College of Dentists of Canada ("RCDC") to take the National Dental Specialty Examination ("NDSE"); the same examination administered to graduates of CDAC accredited, full-time, post graduate specialty programs. The Certificate of Completion/Equivalency shall be valid for a period of three (3) years.

3. Funding of the Process and Program

- The CDRAF/FCORD will identify sources of funding including government funding and develop a strategy to secure the funding.
- The CDRAF/FCORD will provide initial start up funding for the development of
 material required to determine the eligibility of each Applicant including the
 costs of the ACFD and for the National Dental Examination Board ("NDEB") to
 develop the "Dental Specialty Core Knowledge Examination".

4. Agreements of Principles of this MOU

- The CDRAF/FCORD will develop an Agreement with and request that the ACFD develop a business plan that will, among other things, establish:
 - A credential assessment process that will include the basic principles and criteria for determining applicant eligibility for admission to the Program based on CDAC requirements for each specialty,
 - ii. that the ACFD will perform a credential assessment to verify and evaluate the applicant's credentials including the identification of fraudulent submissions. A written confirmation of the credential assessment will be provided to applicants,
 - develop with assistance from the NDEB a Dental Specialty Core Knowledge Examination,
 - iv. administer the Dental Specialty Core Knowledge Examination and provide a written results letter to applicants,
 - v. that the CDRAF/FCORD will use its best efforts to assist the ACFD in obtaining indemnification for processes specific to the Credential assessment procedure it performs at the request of the CDRAF/FCORD.

- The CDRAF/FCORD and each participating University/School recognize the need:
 - to establish that national principles respecting standards and outcomes are being met,
 - ii. to produce an annual report to discuss the effectiveness of the Program and any changes that might be appropriate,
 - that Provincial statutory obligations, where applicable, may require that a DRA representative make an onsite inspection.
- 3. There will be an Agreement between the CDRAF/FCORD and the RCDC, as per its request, that will, among other things:
 - establish that applicants who have obtained a Certificate of Completion/Equivalency will be eligible to attempt the National Dental Specialty Examination ("NDSE"),
 - ii. that the examination shall be the same examination required to be taken by graduates of CDAC accredited dental specialty programs,
 - iii. identify that the RCDC has agreed to recognize for the purpose of Fellowship, applicants who successfully complete the NDSE by way of the Certificate of Completion/Equivalency, and
 - iv. that the CDRAF/FCORD will use its best efforts to assist the RCDC in obtaining indemnification for processes specific to its administration of the NDSE to applicants in support of this process.

5. Process

- (1) Candidates who do not hold a Certificate of the NDEB but who completed a CDAC/CODA accredited, full-time dental specialty program:
 - Each provincial DRA will use its best efforts to amend its Regulations/Bylaws to create a specialty class of licensure/registration.
 - ii. Each provincial DRA, where applicable, will use its best efforts to amend its Regulations/By-laws in order to remove as a requirement a Certificate of the NDEB for a specialty class of license/certificate.
 - Candidates will be immediately referred to the RCDC to have the NDSE administered.

- iv. If successful, Candidate completes provincial process, forms, fees etc.
- Candidate eligible for licensure/registration as a certified dental specialist or certified dental specialist restricted to specialty in the specialty being sought.

(2) Applicants with or without a Certificate of the NDEB whose specialty training is not from a CDAC accredited dental specialty program as defined in 2.1.:

1. Credential Assessment

- Applicant submits application and supporting documentation to ACFD. The ACFD will verify and evaluate the applicant's eligibility as per section 2.4 including the administering of the DSCKE, section 2.5.
- ii. Applicants will not be allowed to take the DSCKE more than twice.
- iii. Applicants in certain specialties may require submission of clinical cases in order to ultimately complete the National Dental Specialty Examination administered by the RCDC. This is the final requirement that would have to be met by each applicant before applying for registration with a DRA.
 - The CDRAF/FCORD has requested that the RCDC look into using alternatives to case requirements in those situations where submission of clinical cases is not possible.
- If credentials are approved, applicant applies to a Participating University to take the Program.

2. Program

The purpose of the Program is:

- To clinically assess applicants to determine whether they have the knowledge, skill and judgment equivalent to the standards set to graduate a student from a CDAC accredited dental specialty program as per section 2.6.
- ii. Where the Participating University is satisfied that the applicant has met the requirements of 2.6, paragraph 2, to issue a Certificate of Completion/Equivalency to that applicant.

- iii. Where the Participating University determines that the applicant has deficiencies, to ascertain if those deficiencies can be addressed through additional education and training ("gap training") within a period of time not to exceed one year (including the time taken for the assessment). Where it is believed that the deficiencies can be addressed within the one year time period, the Participating University is to provide the gap training to the applicant based on the CDAC curriculum content for dental specialty accreditation as outlined in 2.6.
- iv. Where it is determined that the deficiencies cannot be addressed within the one year time period the Participating University shall cause the applicant to withdraw from the Program and shall recommend to the applicant that s/he apply to take a full time CDAC accredited dental specialty program. No 'special status' or advantage shall be awarded to such applicants respecting any future application s/he might make to a post graduate specialty program.

3. RCDC/National Dental Specialty Examination

- The CDRAF/FCORD acknowledges that the RCDC has agreed to recognize the Certificate of Completion/Equivalency for examination and fellowship purposes.
- ii. Each applicant holding a Certificate of Completion/Equivalency shall complete the same examinations as are required to be taken by graduates of the CDAC accredited dental specialty programs which are herein referred to as the National Dental Specialty Examination.
- iii. The CDRAF/FCORD has requested that the RCDC look into using alternatives to case requirements in those situations where submission of clinical cases is not possible.

4. Applicant applies to provincial DRA of choice

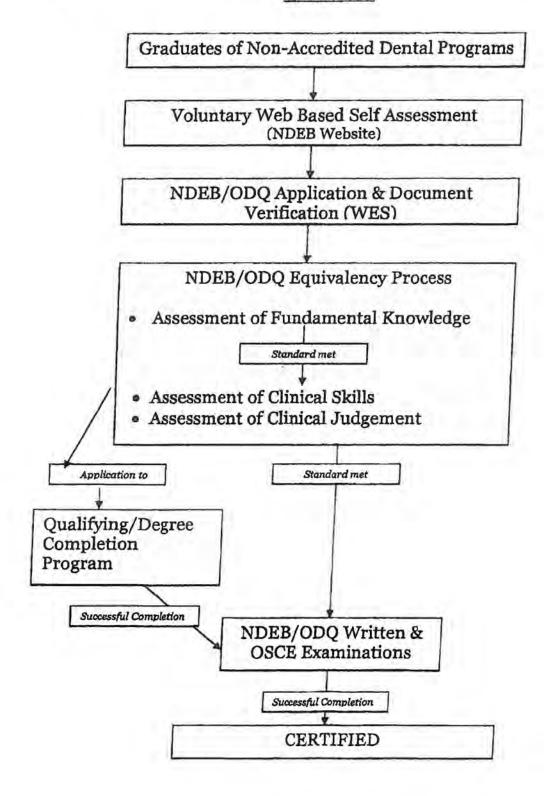
- Applicant will complete the provincial licensing/registration process including submitting all required forms, fees, etc.
- ii. Applicant will then be eligible for licensure/registration as a certified dental specialist or certified dental specialist restricted to specialty in the specialty being sought.

6. Review and appeal processes

- The ACFD shall have a reasonable/responsible appeal process in respect of:
 - i. the results of any examination administered by the ACFD, and
 - Applicants who after being credentialed are determined not to be eligible for the Program.
- Each Participating University shall establish a reasonable/responsible appeal process respecting:
 - Applicants who after being assessed are determined not to be eligible for gap training,
 - ii. Applicants who were asked to withdraw from the Program because a Participating University/School determined that it was not likely that it would be able to correct deficiencies within the one year period as specified in this Memorandum of Understanding.
- The RCDC shall have a reasonable/responsible appeal process in respect of those Applicants who are unsuccessful in their attempt at the National Dental Specialty Examination.
- 4. Any other appeal will require judicial review.

CDRAF/FCORD: 232619

PROPOSED PROCESS FOR GRADUATES OF NON-ACCREDITED DENTAL PROGRAMS



- 19. occlusion;
- 20. orthodontics;
- 21. periodontics;
- 22. general and oral pathology;
- 23. pediatric dentistry;
- 24. pharmacology;
- 25. physiology;
- 26. preventive dentistry;
- 27. CPR procedures;
- 28. maxillo-facial protheses and implanta
- 29. fixed or removable prosthodontics
- 30. quality-treatment and patient care;
- 31. radiology;
- 32. public dental pare;
- 33. treatment of the handicapped and chronically ill; and
- 34. medical emergencies.

Candidates will be eligible to take the examination a total of two times.

Principles for National Recognition of Assessment Processes for Internationally Trained General Dentists

BACKGROUND AND GENERAL PRINCIPLES

In January 2009 the CDRAF held a Summit on the AIT that was attended by representatives from all Provinces. At that meeting, it was acknowledged that there was increasing pressure from both Provincial and Federal Governments to develop an alternative process to the Qualifying/Degree Completion Programs that are currently the only available avenue for Internationally trained dentists to become registered as dentists in Canada.

The following general principles were agreed to as underpinning the development of any National process:

- The mandate all Provincial Regulatory Authorities is to regulate dentistry in the public interest by registering only competent and qualified individuals.
- A transparent, Impartial, objective and fair assessment of an applicant's competencies and qualifications will be available, regardless of an applicant's origins.
- The goal of any process is to establish a process based on nationally agreed upon standards, processes and programs allowing for interprovincial portability of credentials and labour mobility.
- 4. Only those applicants who are able to ultimately establish that they have the knowledge skills and competencies required of a general dentist in Canada, including but not limited to the successful completion of the NDEB, will be accepted for registration.

At that meeting, all jurisdictions also unanimously agreed that a National assessment process for general dentists will:

- Be in addition to the existing Qualifying/Degree Completion Programs.
 - Be based on the process already established by Quebec, in consultation with the NDEB.
 - Be established based on the general concepts of establishing knowledge, skills and judgment equivalent to a Canadian trained dentist.
 - 4. Lead to eligibility to take the National examination.

The CDRAF Executive agreed to coordinate the development of a National approach to the assessment of internationally trained dentists through the development of a Task Force. It was further agreed that the Task Force would report to the Executive before the end of February and that the Executive would report at the next CDRAF Board meeting in April 2009.

PRINCIPLES FOR NATIONAL RECOGNITION OF ASSESSMENT PROCESSES FOR INTERNATIONALLY TRAINED GENERAL DENTISTS

The CDRAF Executive met with representatives of the Task Force and developed a set of principles to act as common criteria for any program that is developed to establish equivalency of Internationally trained dentists. These principles are set out below for the consideration of the CDRAF Board.

Any process developed and utilized for the recognition of internationally trained dentists will have the following elements/criteria in place:

- Verification of the applicant's credentials as a dentist in country of education through a process that is equivalent to the process currently undertaken by the NDEB.
- Verification that the applicant's knowledge, skills and judgment are equivalent to that of a graduate of a Canadian dental school. This verification can take place through one of three recognized methodologies:
 - a. Accreditation
 - i. Accreditation through CDAC
 - II. Accreditation by a CDAC recognized accreditation process
 - b. Examination (or series of examinations)
 - Must be psychometrically sound, ie. each examination is established to be reliable, valid and sustainable
 - Must be substantially equivalent to (or ideally, identical to) the proposed NDEB process.
 - c. Mutual recognition process
 - Must assess substantial equivalence of education programs to those accredited by CDAC.
 - Must be a bona fide, fair, transparent, objective and ongoing process
- Process must lead to eligibility to take a national examination approved, from time to time, by CDRAF.