Direct International Registration and Licensing (DIRL) Final Project Evaluation Report

May 1, 2023 - April 30, 2025

NOVA SCOTIA COLLEGE OF NOVA SCOTIA

Introduction

As Nova Scotia's nursing regulator, the Nova Scotia College of Nursing's (NSCN) role is to ensure that all nurses providing nursing services for Nova Scotians are qualified to do so. The public can depend on NSCN to license those who meet registration requirements and demonstrate they have the knowledge, skills, and competence required to safely and ethically practice as a nurse.

On May 1, 2023, NSCN implemented a new, first-in-Canada approach to registration and licensure that aimed to establish a fast and predictable pathway to licensure in our province. Registered nurses who demonstrate good standing and good character and were licensed in Canada, the Philippines, India, Nigeria, USA, UK, Australia, or New Zealand, were eligible for NSCN's expedited registration and licensure process. Using an equity lens, the newly developed approach yielded consistent and predictable licensing outcomes for nurses educated in Nova Scotia, Canada, as well as the seven specific countries from where 87% of NSCN's international applicants traditionally apply.

The expedited licensing process is intended to ensure a direct and efficient approach to licensing international nurses from designated countries and increase the number of qualified nurses available for the Nova Scotia health system.

Evaluation Framework

As a relational regulator and in keeping with NSCN's values of accountability and transparency, it is important that we make evidence-informed decisions and are accountable and responsible for those decisions. This formal evaluation of NSCN's direct international registration and licensing (DIRL) process provides a systematic method to study our decisions, identify what is working well and what could be improved.

The logic model framework has evaluated:

- a. The regulatory processes used to implement the expedited registration and licensure process
- b. The number of international nurse license holders in Nova Scotia after May 1, 2023
- c. Any potential unintended regulatory impacts.

The following questions provided the context for the evaluation framework:

- 1. Has the expedited registration and licensure process resulted in more nurses being available in the NS health system?
- 2. Has the expedited registration and licensure process resulted in any unintended regulatory impacts?
- 3. What evidence is there that the expedited registrant and licensure process has impacted the actual numbers of nurses available within the system?

Periodic evaluations were planned at six-month intervals. Interim reports were issued after each evaluation interval. These reports along with the data from the last collection period have been compiled into this, the final report for the DIRL project.

Consultation Tools and Data Sources

Data was collected from the following sources:

- NSCN Registrant portal. The portal provides registration information, including the total number of registrants and NCLEX-RN pass rates.
- NSCN website analytics. The website analytics provide the number of unique visits to NSCN website pages, including registration and practice support tools.

- NSCN Practice Database. The database provides the numbers and types of practice consultations offered by NSCN Practice Consultants.
- **NSCN Professional Conduct.** The professional conduct department provides the number of reports and/or complaints received by NSCN about registrants who registered and licensed as part of the DIRL process.
- Verification of Registration Requests Tracking Tool. This tracking tool provides the number of 'verification
 of registration' requests received from registrants applying through the expedited registration and licensure
 process.
- Nova Scotia Health Learning Institute for Health Care Providers. The Institute provides evidence of the number of registrants referred to the RN Bridging program.
- Online registrant survey. This survey was used to obtain feedback from applicants who applied through NSCN's expedited registration and licensure process. During each reporting period the survey remained open for three weeks and had the following response rates:
 - May 1, 2023 October 31, 2023 39%
 - November 1, 2023 April 30, 2024 54%
 - May 1, 2024 October 31, 2024 84%
 - November 1, 2024 April 30, 2025 49%
 - Overall response rate May 1, 2023 April 30, 2025 59%

Results

This section of the report is framed around our research questions.

- Has the expedited registration and licensure process resulted in more nurses available in the Nova Scotia health system?
- What evidence is there that the expedited registrant and licensure process has impacted the actual numbers of nurses available within the system?

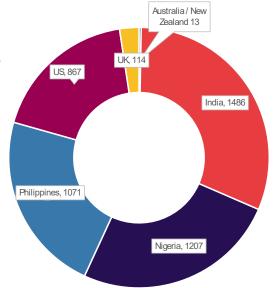
Numbers of nurses

Between May 1, 2023 and April 30, 2025, 4758 nurses were licensed. Our findings show that this translates to a total increase of 29% of nurses eligible to work in Nova Scotia when compared with the total number of nurses registered and licensed on April 30, 2023.

Time to Licensure

Applicants were made eligible for licensure on average of 13.24 days after NSCN received a completed expedited application and the application fee.

Since the launch of the expedited process, NSCN has consistently met the required processing time Key Performance Indicator (KPI) of 30 days. Once eligibility for the applicant has been established, the applicant can activate their license by paying the registration and licensure fee. On average, applicants took 21.87 days from initial



Number of nurses licensed

notification of eligibility to activate their license. This number has been steadily increasing since the beginning of the DIRL project from 10.7 days to 17.77 days to 37.13 days. We have no specific evidence to explain this increase, but feedback gathered in the registrant survey suggests lack of employment or challenges changing work permit to access nursing positions. Additionally, we have been advising Internationally Educated Nurses (IENs) not located in Canada to wait to activate their license until they have confirmed an exit strategy in their home country or arrive in Nova Scotia as a means of reducing the cost to the IEN.

How many nurses are eligible to move from a conditional license to a practising license?

Prior to successfully passing the required entrance exam, nurses can work within the health system with a conditional license. Successfully passing the entrance exam makes the nurse eligible for a practising license.

Over the last two years, a total of 1324 registrants have successfully passed the applicable licensing exam (1235 NCLEX-RN and 89 CPNRE) during this reporting period. It is noted there is a gap in the number of licenses issued (4758) and the number of nurses who have passed the exam (1324). This gap is not attributed to failures on the exams; it is that nurses were not applying to write the exam. To further understand this gap, a question was added to the registrant survey during the third and fourth evaluation period to gain some insights into why conditional license holders were not writing the applicable licensure exam.

Respondents provided a total of 102 verbatim answers, which were then themed. Results indicated the following themes:

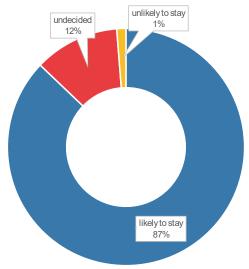
- Preparing for the exam
- Financial challenges
- Visa issues/not in Canada/not near a testing center
- Not mentally or physically ready to take the exam afraid to fail

How many nurses are staying in Nova Scotia?

This is being evaluated through a few measures, including registrant requests for a Verification of Registration (VOR). Requesting a VOR can be an indication that a registrant may be seeking registration and licensure in

another jurisdiction because other regulatory bodies require VORs as part of their application requirements. Over the last two years a total of 1325 requests were received. This number has increased month over month in each reporting period from 40, to 179, to 339, to 767 in the last six months. Since first introducing the expedited registration and licensure process, 27% of IENs licensed under the process have requested VORs.

Over the last two years, through the registrant survey, nurses have been asked how likely they were to stay in Nova Scotia. Results indicated on average 87% of respondents (2235 individuals) indicated they were very likely to stay in Nova Scotia, while 12% of respondents (298 individuals) reported they were undecided. 1% of respondents (32 individuals) reported they were unlikely to stay in the province. A trend in the data was noted in an increased number of nurses being undecided if they will stay in Nova Scotia. Only 5% reported being undecided in the first reporting period and 24% reported being undecided in the last reporting period.



Number of nurses staying in NS

Are nurses employed within the Nova Scotia health system?

Survey participants were asked if they were currently working within the Nova Scotia health system. Over the last two years, 376 respondents self-reported they were working as a nurse in the system, 56 as an LPN and 320 as an RN. A trend has been noted as a decrease in the numbers of RNs working in the system and an increase in the number of LPNs. Most respondents indicated they have gained nursing employment within two months of being licensed (66% of LPNs and 48% of RNs).

Results indicate that most LPNs are working full time (77%) with the remainder reporting they are working part-time (4%) or casual (19%). A trend over the last two years was noted of increasing numbers of LPNs being hired full-time. In the first twelve months of the project only 66% were full-time versus the last six months when 83% reported full-time employment. 82% of respondents reported this is their preferred employment status.

Results indicate that most RNs (69%) are working full time, with the remainder reporting they are working part-time (9%) or casual (22%). A trend over the last two years was noted of increasing numbers of RNs being hired on a casual basis. In the first six months of the project only 7% were casual versus the last six months 33% reported casual employment. Over the last two years 75% of respondents reported this is their preferred employment status. A trend was noted that as there was an increase in casual employment, there was a decrease in this being their preferred employment status.

Survey respondents who are not employed were asked why they were not currently employed as a nurse in Nova Scotia. 46% indicated they could not find a job, 30% indicated they do not live in Canada or in Nova Scotia. There is a trend of increasing numbers of respondents indicating they do not live in Canada or Nova Scotia; in the first 6 months of the project 27% reporting not living in Canada or Nova Scotia versus 50% of respondents reporting this in the last six months. These survey responses are consistent with the themes found in the practice consultations for these nurses over the same time frame.

Has the expedited registration and licensure process resulted in any unintended regulatory impacts?

NSCN Practice Supports

NSCN received a total of 95 requests for practice support from registrants licensed through the expedited registration and licensure process or from managers supporting these registrants over the last two years. The nature of the practice support requests focused on matters concerning employment (e.g., inability to find a job and/or requests about working as a Continuing Care Assistant (CCA) and on questions about conditional license holder restrictions. More recently employers have been requesting education sessions to be delivered by practice consultants on self-regulation, accountability and standards of practice. Specific matters concerning public safety were not raised during these consultations.

NSCN has developed a variety of resources to support these nurses, many who are new to the Nova Scotia health system. Web traffic to the NSCN website featuring these resources received a total of 4503 unique visits over the last two years.

The Registration team reviewed and revised the registration section of the website to help inform applicants of the process to register and license in Nova Scotia. There were 65,067 unique hits to these webpages over the last two years.

Bridging Program

The Nova Scotia Health Learning Institute for Health Care Providers ('The Learning Institute') has an established RN Bridging Program to support nurses who lack currency of practice to re-enter the profession. This 10-month program has been used in the past to support internationally educated nurses in practice. It provides a more extensive orientation, mentorship and transition to practice program than some employers are able to provide. A total of 122 referrals were reported over the last two years. Of these, 24 were asked to stop the bridging program and complete sponsored language training as a condition of their employment. Following successful language training they will be welcomed back to the bridging program as part of a future cohort. Additionally, 14 IENs were also referred to language support outside the context of the bridging program.

Data gathered from the bridging program suggests that establishing practice currency by passing the required registration exam or having practised more than five years, but less than 10 years in the absence of other practice currency requirements is a predictor of a referral to the bridging program.

Regulatory Impact

Data to measure the regulatory impact was collected by evaluation of registrant engagement with NSCN regulatory activity. Over the last two years NSCN received 13 reports, complaints or notices of employment termination of registrants who achieved licensure through the expedited registration and licensure process. Most of these reports were informally resolved (four), dismissed or no action taken (four).

The 13 reports, complaints or notices of employment termination were received in the second year of the DIRL project. We will continue to monitor these indicators to identify and act on trends that may impact public safety.

Temporary Pause on Intake of New Applications

It became increasingly evident in December 2024 that the majority of IENs registered and licensed under the expedited pathway currently do not reside in Nova Scotia nor Canada. In December with approximately 7,500 applications to be processed, a decision was made to temporarily pause the intake of new applications to the expedited registration and licensure pathway effective January 20, 2025.

While on this pause, we continued to evaluate the expedited licensure pathway focusing on its overall impact on the health system in Nova Scotia, sustainability and policies. NSCN is committed to having effective and efficient registration and licensing processes for all its applicants. Specifically, this pause allows us time to review our expedited licensure directives related to currency of practice requirements and exam eligibility, conditional licensure and application fees. In addition to the data gathered for the fourth and final evaluation period, we also reviewed the following information:

- a. Files of IENs referred to bridging education or language support (142).
- b. Files of IENs (RN) seeking licensure as LPN for various LPN on-boarding programs (42).
- c. Data received on complaints or concerns about the practice of an IEN licensed via DIRL.
- d. Themes of emails and conversations with IENs and information obtained from discussions with system partners.
- e. Internal workflow and process maps.

What We Heard and Learned

- 1. Most applicants we approved in 2024 did not live in Nova Scotia or Canada.
- 2. 40% of the DIRL applicants we approved requested a Verification of Registration (VOR) signaling their intent to seek registration in another jurisdiction.
- 3. IENs reported ongoing challenges obtaining employment related to system needs or previous work permit commitments.
- 4. IENs who have not had the opportunity to engage in RN practice where there is a high degree of professional autonomy, employer and system support for independent decision making, collaborative decision making with other health care providers and advocacy prior to practising in Nova Scotia regardless if they have passed the NCLEX-RN, were more likely to have a "transition to practice gap" and require additional education and a prolonged employer orientation to successfully transition to the Nova Scotia practice context.
- 5. IENs with less recent RN practice (with or without passing the NCLEX-RN) were more likely to require additional education and a prolonged employer orientation to successfully transition to the Nova Scotia practice context.
- 6. Language barriers proved to be a factor for some IENs regardless of the location of the entry to practice education.
- 7. There has been an increase in the number of practice consultations related to IENs' gap in understanding or knowledge of the self-regulatory process.
- 8. Increase in NSCN staff resources to validate regulatory documents due to changes in the quality of the regulatory documents received.

- 9. Increase in NSCN staff resources to process a file due to the use of a third-party vendor to manage an application on behalf of an applicant.
- 10. Increase in health system staff resources to support IENs requiring additional education and a prolonged employer orientation to successfully transition to the Nova Scotia practice context.

Understanding Context

The health system has been responsive and created processes and support to enable IENs to successfully integrate into the system. NSCN is committed to providing effective and efficient registration and licensing processes for all its applicants. Refining our regulatory processes based on what we have seen, heard and learned will enable us to better serve the health system while ensuring IENs are prepared to successfully transition to RN practice in the Nova Scotia health care system.