

# Government of Alberta Health Care Aide Provincial Curriculum Substantial Equivalence Assessment Policies



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# Introduction

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## Background

The title Health Care Aide (HCA) applies to direct client service providers who provide basic health services and assistance/support with activities of daily living for clients with medical conditions or functional limitations.<sup>1</sup> HCAs are not a self-governing profession under the *Health Professions Act*, nor do HCAs have a central organization that advocates for the occupation.

HCAs are the largest occupational group in the continuing care sector and constitute the second largest group of health care workers in Alberta, after registered nurses.<sup>2</sup> It is estimated that in the continuing care sector more than 70% of the direct care is provided by HCAs.<sup>3,4</sup>

In accordance with the Continuing Care Health Service Standards there are three ways in which a HCA is recognized for practice in Alberta. They can be recognized as a “certified” HCA who graduated from a program approved in Alberta, they can be “deemed competent” by their employer who completes a competency assessment tool for the HCA, or they can be deemed “substantially equivalent”.

Substantial equivalence is the process of reviewing education, experience and any other evidence submitted by the health care provider who was educated outside of Alberta. The substantial equivalence assessment will provide an evaluation of the documentation provided by the health care provider in order to determine if the competencies they hold can be considered equivalent to those required of the certified Alberta HCA graduate.

## Substantial Equivalence Assessment Policies

The purpose is to guide the development and implementation for assessing whether an Applicant’s education and experience is substantially equivalent to the most recent Government of Alberta Health Care Aide Provincial Curriculum.

The Policies were developed by the College of Licensed Practical Nurses of Alberta (CLPNA) in collaboration with the Ministry of Health.

The Policies have implications for the following groups:

- **The CLPNA** is responsible for developing and administering the substantial equivalence assessment process.
- **The Ministry of Health** has a Service Agreement with the CLPNA to administer the Substantial Equivalence Assessments.
- **Employers** are responsible for HCA employment, performance, and competency assessment.
- **Applicants of Substantial Equivalent Assessment for the HCA occupation in Alberta.**

# Glossary

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Term	Description
<b>aggregate data</b>	For the purposes of substantial equivalence, aggregate data refers to detailed data on HCAs that has been summarized to provide information about HCAs and where they are coming from as a group. Individual HCAs would not be identifiable. This is the type of information that would be provided in reports produced by the Alberta Health Care Aide Directory (Directory).
<b>HCA</b>	Health care aides (HCA) are an unregulated, direct client service providers of basic health services and assistance/support with activities of daily living for clients who have medical conditions or major functional limitations. HCAs provide basic personal care and health services in all health sectors to meet the daily living needs of clients.
<b>CAP Tool</b>	The Competency Assessment Profile (CAP) tool is a standardized provincial assessment tool that aligns with the most recent Alberta HCA curriculum. It is used by employers to assess HCA's ability to meet the required competency.
<b>CCHSS</b>	The Continuing Care Health Service Standards (CCHSS) - 2018 sets the minimum requirements that operators must comply with in the continuing care health system (includes Coordinated Home Care Program, Supportive Living facilities and Long-Term Care Facilities). <sup>5</sup>
<b>HCA Competency Profile</b>	Outlines the knowledge, skills, behaviours, and attitudes required by all HCAs who deliver care in Alberta. It outlines the core competencies for HCAs and provides the foundation and structure for the Curriculum.
<b>competency status</b>	The attainment of core competencies in one of three possible competency statuses <sup>6</sup> : <b>Certified:</b> certified as a HCA through a Government of Alberta licensed post-secondary institution using the Government of Alberta HCA Provincial Curriculum. <b>Substantially Equivalent:</b> an educational background deemed equivalent by the CLPNA as compared to the approved Provincial HCA Curriculum. <b>Deemed Competent:</b> assessed as competent by an employer using the Provincial CAP tool.
<b>direct patient care</b>	Direct patient care refers to activities that assist the patient in meeting their basic needs.
<b>Directory</b>	The Alberta Health Care Aide Directory (Directory) is a centralized database that collects individual information,

	including demographics, education, employment details and attainment of core competencies, as defined in the Continuing Care Health Services Standards (CCHSS) for HCAs in Alberta. The Alberta HCA Directory serves as a central resource for HCA information, news and updates.
<b>directory administrator</b>	The College of Licensed Practical Nurses of Alberta.
<b>directory status</b>	Directory status includes: <ul style="list-style-type: none"> <li>• A HCA who is currently enrolled in the Directory.</li> <li>• An inactive status assigned to a HCA previously enrolled on the Directory who has not renewed their enrolment on the Directory.</li> </ul>
<b>employer</b>	A legal entity that provides health care directly to clients. <sup>7</sup>
<b>Curriculum (2019)</b>	The Government of Alberta HCA Provincial Curriculum-2019 (Curriculum 2019) is based on the Government of Alberta HCA Competency Profile (2018) and outlines the knowledge, learning activities and instructional methods that facilitates attaining the key competencies required for HCAs to provide safe, quality care to Albertans.
<b>in-progress enrolment</b>	HCAs who are working towards one of the three competency statuses (certified, substantially equivalent or deemed competent).
<b>PIPA</b>	<i>Personal Information Protection Act (PIPA)</i> governs the collection, use and disclosure of personal information by private sector organizations in a manner that recognizes both the right of an individual to have his or her personal information protected, and the need of organizations to collect, use, or disclose personal information for purposes that are reasonable. <sup>8</sup>
<b>PSI</b>	Post-Secondary Institution (PSI) licensed to use the approved Government of Alberta HCA Curriculum.
<b>Substantial Equivalence Assessors</b>	Qualified professionals who conduct the Substantial Equivalence assessments
<b>workforce planning</b>	Workforce planning (also known as health human resource planning) refers to the analysis, evaluation, forecasting and management of the supply and demand of human resources, aligning with the employer's strategic plan. <sup>9</sup>

## 1.0 Eligibility for Substantial Equivalence Application

<b>Policy #</b>	<b>1.0</b>
<b>Policy Title</b>	<b>Eligibility for Substantial Equivalence Application</b>
<b>Rationale</b>	Provides a systematic approach to determine if individuals who have not completed an approved HCA program in Alberta are eligible to apply for substantial equivalence assessment.

### Policy Statement

#	Policy Statement	Rationale
1.1	<p>Applicants who have not completed an approved HCA training program in Alberta are eligible to be assessed for substantial equivalence, including:</p> <ul style="list-style-type: none"> <li>• Out-of-province HCA Program graduates;</li> <li>• Internationally Educated Nurses; and</li> <li>• Individuals with education as a HCA, personal support worker, continuing care assistant, nurse or other profession considered to provide direct patient care.</li> </ul>	<ul style="list-style-type: none"> <li>• Identifies the most appropriate health care providers who may apply for substantial equivalence.</li> <li>• Allows applicants to have the opportunity to meet the HCA competency requirements set out by Alberta Health including the Continuing Care Health Service Standards (8.4; 8.5).</li> <li>• Only applicants who provide direct care to clients will be considered for substantial equivalence.</li> </ul>
1.2	<p>Applicants who do not have education in an occupation that provides direct patient care are not eligible to be assessed for substantially equivalence.</p> <ul style="list-style-type: none"> <li>• They will be referred to a licensed post-secondary institution that offers the HCA Program.</li> </ul>	<ul style="list-style-type: none"> <li>• To provide ineligible applicants with information on HCA Programs in Alberta, should they choose to pursue formal training.</li> </ul>
1.3	<p>Applicants must have worked in the professions listed in Policy 1.1 within the previous four-year period and worked a minimum of 1,000 practice hours at that time in order to be eligible for a substantial equivalence assessment.</p>	<ul style="list-style-type: none"> <li>• This ensures that applicants being assessed have relevant experience and are current in their knowledge.</li> </ul>

## 2.0 Substantial Equivalence Application Requirements

<b>Policy #</b>	<b>2.0</b>
<b>Policy Title</b>	<b>Substantial Equivalence Application Requirements</b>
<b>Rationale</b>	To identify the required information an applicant must provide to be assessed for substantial equivalence.

### Policy Statement

#	Policy Statement	Rationale
2.1	<p>Applicants must enroll on the HCA Directory and must provide the following information on the application form:</p> <ul style="list-style-type: none"> <li>– Legal Surname</li> <li>– Legal First Name</li> <li>– Legal Middle Name</li> <li>– Usual Name</li> <li>– Date of Birth</li> <li>– Gender</li> <li>– Languages written/ spoken</li> <li>– Full address (apartment/suite, address, city, province, country, postal code)</li> <li>– Main telephone</li> <li>– Other Telephone</li> <li>– Email address</li> <li>– Credential type (e.g. degree, diploma, certificate)</li> <li>– Date credential granted</li> <li>– Post Secondary Institution granting institution the credential</li> <li>– Post Secondary Institution address, website, phone number</li> <li>– Employment Status</li> </ul> <p>If applicable:</p> <ul style="list-style-type: none"> <li>– Employer(s) name</li> <li>– Employer(s) address</li> <li>– Employment status (full time, part time, casual) for each employer</li> <li>– Current place of work Start date/End date</li> </ul>	<ul style="list-style-type: none"> <li>• These requirements are needed to uniquely identify applicants.</li> <li>• Provides information on the profile of substantial equivalent applicants in Alberta for the purposes of workforce and educational planning and employment research.</li> </ul>
2.2	Applicants must submit proof of identity using two (2) valid government-issued identifications; one must be photo identification.	<ul style="list-style-type: none"> <li>• Helps prevent fraudulent identity activities.</li> </ul>
2.3	2.3.1 Applicants must have the curriculum of	<ul style="list-style-type: none"> <li>• Allows for the assessment of the</li> </ul>

#	Policy Statement	Rationale
	<p>the program they completed sent directly from the PSI to the CLPNA to be assessed for equivalence.</p> <p>2.3.2 If the curriculum is not available, a detailed course syllabus and/or curriculum objectives supplied by the educational institution will be utilized.</p> <p>2.3.3 In cases where the school is unable to provide curriculum, the applicant's personal copies of the course syllabus or curriculum objectives, will be used for evaluation and this will be identified in the assessment results.</p>	<p>integrity and validity of the curriculum documents submitted by the applicant.</p> <ul style="list-style-type: none"> <li>• The curriculum is the foundation of the substantial equivalence assessment.</li> <li>• Allows applicants alternative options if the curriculum is inaccessible.</li> </ul>
2.4	<p>Applicants must provide evidence of English Language Proficiency in alignment with Alberta HCA Program requirements. Acceptable Academic Language Arts include:</p> <ul style="list-style-type: none"> <li>• English, 20-2 level course, with a minimum score of 60% achieved or Canadian jurisdiction equivalent; or</li> <li>• English 20-1 with a minimum of 60% achieved or Canadian jurisdiction equivalent; or</li> <li>• English 30-1 or 30-2 with a minimum of 55% or Canadian jurisdiction equivalent; or</li> <li>• Deemed equivalent by completion of ACCUPLACER (assessment placement test).</li> <li>• By completing a recognized post-secondary degree or diploma program in Canada that involved at least two full years, consecutive academic study in English.</li> </ul> <p>Or the following testing:</p> <ul style="list-style-type: none"> <li>• IELTS Academic: 6; no section score below 5.5; or</li> <li>• TOEFL iBT: 71; or</li> <li>• CELPIP General; no section score below 6; or</li> <li>• Canadian Language Benchmarks/Milestones Test: 7 in each strand, not an average of 7; or</li> <li>• CELBAN: 7 in each are of listening, reading, writing and speaking, not an average of 7</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants must meet the language proficiency requirements as outlined in the HCA Competency Profile.</li> </ul>



## 3.0 Student Nurses' Eligibility for Substantial Equivalence Application

<b>Policy #</b>	<b>3.0</b>
<b>Policy Title</b>	<b>Student Nurses' Eligibility for Substantial Equivalence Application</b>
<b>Rationale</b>	Provides a systematic approach to enrolling Alberta nursing students to urgently address the shortage of HCAs in Alberta during the COVID-19 pandemic Provincial response.

### Policy Statement

#	Policy Statement	Rationale
3.1	Nursing students must enrol on the HCA Directory in order to be employed as a HCA in Alberta.	<ul style="list-style-type: none"> <li>Enrolment in the HCA Directory is a requirement for employment in a publicly funded facility in Alberta.</li> </ul>
3.2	<p>Nursing students eligible for employment as a HCA in Alberta must meet the following criteria:</p> <ul style="list-style-type: none"> <li>a Practical Nursing (PN) student currently enrolled in an Alberta program who has completed one year of the program; <b>or</b></li> <li>a Baccalaureate Nursing (BN or BScN) student currently enrolled in an Alberta program who has completed two full years of the program; <b>or</b></li> <li>a Psychiatric Nursing student currently enrolled in an Alberta program who has completed two full years of the program; <b>and</b></li> <li>The nursing student has completed a continuing care or medical unit clinical placement; <b>and</b></li> <li>The nursing student has some knowledge and experience with medication assistance.</li> </ul>	<ul style="list-style-type: none"> <li>Identifies the eligible nursing students who may apply for enrollment on the Directory through the substantial equivalence stream.</li> <li>Sets the minimum knowledge and skill level required to provide safe, competent and ethical care.</li> <li>Nursing students currently enrolled in Alberta programs can be swiftly deployed to facilities in Alberta.</li> </ul>

3.3	Nursing students must provide a copy of their post-secondary institution's transcript.	<ul style="list-style-type: none"> <li>Provides verification that the nursing student has met the criteria.</li> </ul>
3.4	This policy shall expire on December 31, 2021.	<ul style="list-style-type: none"> <li>The policy addresses the COVID-19 pandemic response to supply sufficient HCAs during the pandemic only.</li> </ul>

## 4.0 Substantial Equivalence Fees

<b>Policy #</b>	<b>4.0</b>
<b>Policy Title</b>	<b>Substantial Equivalence Fees</b>
<b>Rationale</b>	Application fees cover the costs associated with the assessment of substantial equivalence applications.

### Policy Statement

#	Policy Statement	Rationale
4.1	Applicants must pay the application assessment fee in order to process their application for substantial equivalence.	<ul style="list-style-type: none"> <li>The substantial equivalence process operates at cost recovery.</li> </ul>
4.2	Applicants who have submitted incomplete applications (e.g., do not have their application documents submitted) within 6 months of the receipt of their application will have their file closed.  The CLPNA will issue a refund of the full amount, less an administration fee.	<ul style="list-style-type: none"> <li>The CLPNA is required to return unapplied funds to applicants to avoid maintaining liability.</li> </ul>
4.3	Applicants who withdraw from the substantial equivalence assessment prior to their application documents being received by the CLPNA will be eligible for a full refund less, an administration fee.	<ul style="list-style-type: none"> <li>The CLPNA is required to refund applicants in regard to services not rendered to avoid any liability.</li> </ul>
4.4	Application fees are non-refundable once all application documents have been received by the CLPNA.	<ul style="list-style-type: none"> <li>Allows for appropriate compensation for the work started and/or completed by the CLPNA.</li> </ul>

## 5.0 Substantial Equivalence Application Review

<b>Policy #</b>	<b>5.0</b>
<b>Policy Title</b>	<b>HCA Substantial Equivalence Application Review</b>
<b>Rationale</b>	Substantial Equivalence Assessors must be trained to complete a standardized review that is fair, transparent and consistent.

### Policy Statement

#	Policy Statement	Rationale
5.1	<p>4.1.1 The CLPNA will develop minimum competencies for Substantial Equivalence Assessors.</p> <p>4.1.2 Substantial Equivalence Assessors will receive required training and will work under the direction of the CLPNA's Registrar.</p>	<ul style="list-style-type: none"> <li>Substantial Equivalence Assessors' training must be consistent and standardized.</li> <li>Allows for consistent Substantial Equivalence application reviews</li> </ul>
5.2	The CLPNA will ensure that there are a minimum of three staff trained in HCA substantial equivalence assessment.	<ul style="list-style-type: none"> <li>Allows for continuity of the standardized substantial equivalence process and decreases potential for interruption to the services.</li> </ul>
5.3	Substantial Equivalence Assessments will be based on the HCA Program learning outcomes in the most recent Curriculum	<ul style="list-style-type: none"> <li>The most current Curriculum must be utilized for substantial equivalence assessments.</li> </ul>
5.4	The CLPNA will develop and maintain a tool for the purposes of substantial equivalence assessment of HCAs.	<ul style="list-style-type: none"> <li>Assessors must use a consistent methodology framework in the assessment process.</li> </ul>
5.5	Applicants will receive a letter from the CLPNA informing them of their assessment result within 12 weeks of receiving the curriculum or alternative documents.	<ul style="list-style-type: none"> <li>Provides a timeframe in which the applicant will be able to plan for a result.</li> <li>Provides an adequate timeframe for assessors to complete the assessments and provide the applicant with the result.</li> <li>Provides the applicant with a written decision for their records.</li> </ul>
5.6	Applicants who are not deemed substantially equivalent will be provided with a gap analysis report and options to remediate the gaps (e.g., referral to post-secondary institutions offering the HCA Program).	<ul style="list-style-type: none"> <li>Provides an unsuccessful applicant with options should they choose to pursue employment as a HCA.</li> <li>Provides objective reasons for assessment decision.</li> </ul>

## 6.0 Substantial Equivalence Decision Appeal Process

<b>Policy #</b>	<b>6.0</b>
<b>Policy Title</b>	<b>Substantial Equivalence Decision Appeal Process</b>
<b>Rationale</b>	To provide applicants with the opportunity to appeal the decision of their assessment results.

### Policy Statement

#	Policy Statement	Rationale
6.1	Applicants disagreeing with the results of their assessment may submit a written appeal to the CLPNA within a maximum of five business days of the receipt of the assessment decision.	<ul style="list-style-type: none"> <li>Allows for a mechanism of appeal.</li> <li>To adhere to principles of administrative fairness.</li> </ul>
6.2	Another member of the review team will independently assess the appeal request within 10 business days. The team members will discuss their independent reviews and come to a decision.	<ul style="list-style-type: none"> <li>This promotes inter-rater reliability, consistency in decision-making.</li> </ul>
6.3	Where two team members cannot reach a decision, a third reviewer will review the appeal documents and reach a decision with the other members.	<ul style="list-style-type: none"> <li>This promotes inter-rater reliability, consistency in decision-making.</li> </ul>
6.4	If the applicant remains unsatisfied with results of the CLPNA appeal process, they may submit a written appeal to Alberta Health within five business days of the receipt of the appeal decision.	<ul style="list-style-type: none"> <li>This provides another mechanism other than judicial review for the applicant to pursue if they remain unhappy with the decision.</li> </ul>
6.5	The CLPNA will submit a substantial equivalence appeal report (including reasons for decision-making) to Alberta Health for review within five business days of receipt of a request from Alberta Health.	<ul style="list-style-type: none"> <li>To adhere to principles of administrative fairness.</li> </ul>

## 7.0 Retention of Program Curricula

<b>Policy #</b>	7.0
<b>Policy Title</b>	Retention of Program Curricula
<b>Rationale</b>	The retention of curricula and associated materials allows for substantial equivalence assessments and/or reviews, as well as the ability to audit past decisions for process improvement.

### Policy Statement

	Policy Statement	Rationale
7.1	The CLPNA will retain a copy of all program curriculum or alternative documents received to conduct the substantial equivalence assessment for a period of no less than five years.	<ul style="list-style-type: none"> <li>• A five-year period of retention allows the curriculum or alternative documents to be available when applicants request to appeal the assessment decision.</li> <li>• Allows for faster processing time for applicants from the same program within the same time-period.</li> </ul>
7.2	The CLPNA will maintain a repository of decisions regarding the substantial equivalence assessment outcomes based on educational institution for a period of no less than 10 years.	<ul style="list-style-type: none"> <li>• Allows for faster processing time for applicants from the same program within the same time-period.</li> <li>• Allows for consistency in decision making for applicants from the same program.</li> <li>• Allows for evaluation of programs when in the future the program curriculum may not be accessible.</li> </ul>

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- <sup>1</sup>Alberta Health. Health Care Aide Curriculum. 2010. (Modified). Note that “HCA” refers to an occupation. Individual workers in this occupation may have a variety of titles (including HCA, Nursing Attendant, Home Support Aide, and Home/Personal/Residential Support Worker).
- <sup>2</sup>Estimates address all health care workers across the provincial health system with registered nurses as the largest group of health care workers at approximately 34,000, followed by health care aides at approximately 22,000.
- <sup>3</sup> Janes, N., Sidani, S., Cott, C., Rappolt, S. Figuring it out in the moment: A theory of unregulated care providers’ knowledge utilization in dementia care settings. *Worldviews of Evidence Based Nursing*. 2008; 5:13-24.
- <sup>4</sup> Continuing Care Workforce Working Group. A Framework of Provincial Human Resource Objectives, Strategies and Action Plans for the Future Continuing Care Sector: A Report of the Continuing Care Workforce Working Group. 2001.
- <sup>5</sup> Alberta Health. 2016. Continuing Care Health Service Standards. <http://www.health.alberta.ca/documents/Continuing-Care-Standards-2016.pdf> Accessed February 22 2016 . An exception to the timelines is made for HCA competency assessment in acute care.
- <sup>6</sup> Adapted from: Alberta Health. 2016. Continuing Care Health Service Standards. <http://www.health.alberta.ca/documents/Continuing-Care-Standards-2016.pdf> Accessed February 22 2016. An exception to the timelines is made for HCA competency assessment in acute care.
- <sup>7</sup> Adapted from: Alberta Health. 2016. Continuing Care Health Service Standards. <http://www.health.alberta.ca/documents/Continuing-Care-Standards-2016.pdf> Accessed February 22 2016. An exception to the timelines is made for HCA competency assessment in acute care.
- <sup>8</sup> Office of the Information and Privacy Commissioner of Alberta. Principles. <http://www.oipc.ab.ca/pages/Personal Information Protection Act/Principles.aspx> Accessed December 2015.
- <sup>9</sup> Government of Alberta. 2008. Provincial Health Human Resource Planning & Guide for Health Authorities. <http://www.health.alberta.ca/documents/Workforce-Health-HR-plan-2008.pdf> Accessed January 2016.