

Policy on Discipline Review

1. Objective

The Royal College, in its mandate articulated by a Royal Charter in 1929, plays a key role in the oversight of the system of specialty medicine in Canada. Oversight of the system of specialties is undertaken principally by the Committee on Specialties (COS) and its associated policies and processes, including discipline review.

Discipline review is one aspect of the COS' mandate and a principal way the Royal College monitors the ongoing health of recognized disciplines and their specialty committees, their optimal configuration within the health care system, and their alignment with societal needs. Discipline review is a collaborative process between the COS and the specialty committees and offers the opportunity for each specialty committee to promote the aspects of their discipline that are functioning well and achievements of the committee. At its core, it is intended to be a continuous quality improvement process: the primary goal being to prompt specialty committees towards proactive identification and management of emergent issues. Recognizing that some issues facing a given specialty committee may be outside of their control for redress, the review process also provides an opportunity for the specialty committee to identify areas in which it requires additional support from the Royal College, as relevant to the organization's mandate.

This policy establishes a systematic process through which the COS reviews each recognized discipline to ensure that it remains practical and viable in light of the evolution of medical science, the changing climate of the health care system and the dynamic health needs of the population in Canada, and that the specialty committee is equipped to address any challenges that the discipline faces.

2. Definitions & Acronyms

AFC Area of Focused Competence

COS Committee on Specialties

CSE Committee on Specialty Education

Discipline review

process

The process through which the COS determines the functioning of the discipline and specialty committee, and renders a decision on the status of the discipline. The process is staged in that the COS may direct specialty committees to conduct more thorough analyses of their discipline, based on the findings of a previous review(s).

Discipline review status

The status assigned by the COS following a review. A status may either be Regular Review, Monitoring Report, Focused Review or In-Depth Review.

ECC

Executive Committee of Council

Focused Review

The COS may identify at least one major area of concern that requires further examination by and a response from the specialty committee to ensure the continued health and sustainability of the discipline. A Focused Review is led by the specialty committee and includes additional research or information relevant to the areas identified by the COS through the discipline review process, as well as a plan of action to strengthen the functioning of the discipline and/or specialty committee. The OSE may provide research and analytical support at the request of the specialty committee chair.

Impacted disciplines

Impacted disciplines are either entry route disciplines (specialties and subspecialties) for the discipline in question and/or disciplines (specialties, subspecialties and AFCs) that may have closely-related scopes of practice and/or training standards with the discipline in question, as identified by the Committee on Specialties.

In-Depth Review

The COS may identify major new and/or continuing areas of concern which call into question the overall integrity or sustainability of the discipline in its current configuration and/or the functioning of the specialty committee. In-Depth Reviews are led by the OSE and involve:

- the Office of Specialty Education collecting additional data or information regarding the discipline, to inform the COS' discussions at a future meeting; and,
- the Office of Specialty Education striking an ad hoc working group, with broad membership beyond that of the specialty committee, and Independent Advisory Panel, to explore and produce recommendations.

Major areas of concern

The COS may identify a "major" area of concern during a discipline review if it raises fundamental or systemic questions about the future or functioning of the discipline and its alignment to societal need. A "major" area of concern may also be identified if there are continuing concerns about the capacity of the specialty committee and/or its leadership that prevents the identification of areas of weakness within the discipline and implementation of an appropriate policy response. Examples of "major" areas of concern are included in Appendix B.

Minor areas of concern

The COS may identify a "minor" area of concern during a discipline review if it <u>does not</u> raise fundamental or systemic questions about the future or functioning of the discipline and its alignment

to societal need. Examples of "minor" areas of concern are included in Appendix B.

Monitoring Report

OSE

The COS may identify one or more minor area(s) of concern that require additional information and/or development of an intervention by the specialty committee. Additionally, the COS may request a Monitoring Report if it requires an update on the progress of existing interventions led by the specialty committee (e.g., ongoing work to implement the recommendations resulting from a Focused or In-Depth review).

Office of Specialty Education

Regular Review The Regular Review focuses on the ongoing work and function of

the specialty committee. During a Regular Review the COS evaluates the work and activities of the specialty committee through their responses to standardized questions and data sources, and identifies strengths and areas for attention for the

discipline and/or the specialty committee.

Regular Review Cycle A six-year, continuous cycle through which all Royal College

disciplines and their specialty committees proceed to Regular

Review.

Royal College Royal College of Physicians and Surgeons of Canada

Specialty committee Umbrella term for all Royal College discipline specialty,

subspecialty, and AFC (sub)committees, and fundamentals

advisory committees.

Staff follow-up The COS may request a staff follow-up with an answer to limited

or close-ended questions that result from the discipline review. Most commonly, this option would be used to provide an update on data within the Royal College's purview (e.g., the number of accredited programs or number of diplomates/certificants). If the COS requests a staff follow-up, the discipline in question is assigned one of the four review statuses (i.e., Regular Review, Monitoring Report, Focused Review, or In-Depth Review) and a staff follow-up is presented to the COS for information only within

the requested timeframe.

Withdrawal of recognition

The process through which a discipline ceases to be recognized by

the Royal College (i.e., "sunset").

3. Policy

- 3.1 The COS considers the Regular Review of all recognized Royal College disciplines (fundamentals, specialties, subspecialties, and AFCs) typically on a six-year, continuous cycle.
- 3.2 Disciplines are typically reviewed with other like disciplines (e.g., all Psychiatry subspecialties are grouped for the purposes of review). As such, a discipline's initial review

may not occur six years after recognition, but rather will occur whenever other like disciplines are being considered, and then on a follow-up schedule associated with their review status.

- 3.3 The COS bases its review on the response provided by the specialty committee and any applicable information or data provided by the OSE. The COS uses the *Principles of COS Decision-Making* to aid its decision-making.
- 3.4 As a result of the discipline review process, the COS can award one of the following discipline review statuses:

a. Regular Review

The COS will determine that the discipline may return to the Regular Review cycle if it agrees that the discipline is functioning well and there are no minor or major concerns identified.

b. Monitoring Report

The COS may request a Monitoring Report if it identifies one or more minor area(s) of concern.

c. Focused Review

The COS may request a Focused Review if it identifies one or more major area(s) of concern.

d. <u>In-Depth Review</u>

The COS may request an In-Depth Review, if it identifies major new and/or continuing areas of concerns which call into question the overall integrity or sustainability of the discipline in its current configuration and/or the functioning of the specialty committee. This status is assigned if the COS determines that leadership and additional resources from the OSE are necessary to help the specialty committee address the issues identified.

The COS may also request a staff follow-up to answer limited or close-ended questions that result from the discipline review.

The COS has ultimate authority for assigning the discipline review status.

- 3.5 Following an In-Depth Review, should the COS have significant unresolved concerns that it feels cannot be addressed through the discipline review process, the COS has the authority to:
 - a. Initiate a major change to the discipline, including a change to the discipline's status (e.g., from subspecialty to AFC or from subspecialty to primary specialty), name, entry routes or length of training (in accordance with the relevant policy); or
 - b. Initiate a process to withdraw recognition of the discipline (see appendix C).

In both cases, the COS will ask the CSE to consider its recommendation during the next committee cycle, in accordance with the relevant policy for the change, to ensure due process and to allow response from the specialty committee and stakeholder community.

Decisions on major changes to or withdrawal of recognition of specialty, subspecialty, and fundamentals disciplines will require further consideration by ECC, and final approval by Council.

- 3.6 The COS provides feedback and the outcome of the review, including the new discipline review status, to the specialty committee. This may include recommendations for assuring the continuing success of the discipline.
- 3.7 If the COS mandates a change (i.e., a change in status, name, entry routes or length of training) or withdrawal of recognition of a discipline, the specialty committee may appeal the decision using the applicable appeals policy. If the appeal is denied or the applicant chooses not to pursue an appeal, the specialty committee will be required to implement the change mandated by COS, by adhering to and following the procedures within the associated policy for that change.

4. Roles and Responsibilities

4.1 Committee on Specialties (COS)

The COS is responsible for:

- a. granting the deferral of discipline reviews for more than one year;
- b. evaluating discipline review materials;
- c. identifying areas that require further examination by the specialty committee;
- d. rendering a decision on the status of the discipline; and
- e. making a recommendation to CSE regarding a major change to and/or the withdrawal of recognition of specialty, subspecialty, fundamentals, and AFC disciplines (resulting from an in-depth review).

4.2 Committee on Specialty Education (CSE)

The CSE is responsible for:

- a. approving changes to this policy and the procedure for its implementation;
- b. making a recommendation to ECC on major changes to and/or the withdrawal of recognition of specialty, subspecialty, and fundamentals disciplines; and
- c. rendering a final decision on the withdrawal of recognition of AFCs.

4.3 Executive Committee of Council (ECC)

The ECC is responsible for providing a recommendation to Council regarding a major change to and/or the withdrawal of recognition of primary, subspecialty, and fundamentals disciplines.

4.4 Royal College Council

Council is responsible for rendering a final decision on a major change to and/or the withdrawal of recognition of specialty, subspecialty, and fundamentals disciplines.

4.5 Office of Specialty Education (OSE)

The OSE is responsible for:

- a. granting the deferral of reviews by up to one year.
- b. providing discipline-specific data and information for the specialty committee and COS;
- c. receiving the discipline report from the specialty committee;
- d. coordinating and drafting communication for the COS regarding discipline review;
- e. drafting and distributing communications regarding the COS' decision to the relevant specialty committee;
- f. providing limited information or data to the COS in response to a requested staff follow-up;
- g. partnering with a specialty committee, at the request of the chair, to provide research and logistical support, during Focused Reviews;
- h. leading additional In-Depth Review processes to collect additional data or information regarding the discipline and to create an ad hoc working group and Independent Advisory Panel to explore and produce recommendations;
- coordinating and drafting communications for the COS, CSE, ECC and Council regarding a major change to a discipline and/or withdrawal of recognition of a discipline;
- j. coordinating and drafting materials for the national consultation and public notification processes; and,
- k. synthesising all responses received through the national consultation and public notification processes for the COS, CSE, ECC and Council.

4.6 Specialty Committee

The specialty committee is responsible for:

- a. drafting a response to the review questions with input from relevant stakeholders, such as the National Specialty Society;
- b. submitting a response to the OSE by the required deadline;
- c. ensuring a representative, typically the specialty committee chair, is available to answer any questions that the COS may have;
- d. working towards addressing the areas identified by the COS through the discipline review process;
- e. conducting, commissioning, and/or collating research and formulating recommendations during Focused Reviews to address the challenges identified by the COS through the discipline review process;
- f. collaborating with the Office of Specialty Education during an In-Depth Review to collect additional data or information regarding the discipline and participating in an ad hoc working group to explore and produce recommendations; and
- g. providing a response to the COS if it proposes a major change and/or withdrawal of recognition.

During a Focused Review, the specialty committee may also choose to:

- h. partner with the OSE which can provide research and logistical support; and/or
- appoint an ad-hoc working group or advisory committee, comprised of experts within the discipline and the system of specialties, to conduct research and formulate objective recommendations to address the challenges identified by the COS through the discipline review process.

5. References

- Principles of COS Decision-Making
- Policy on Discipline Status Change
- Policy on Discipline Name Change
- Policy on Modifications to a Discipline's Route of Entry
- Policy on Changes to a Discipline's Length of Training
- Appeal Policy and Procedure: Major COS Applications

6. Contact(s)

For information or clarification, please contact:

Director, Specialty Education, Strategy and Standards c/o Office of Specialty Education Royal College of Physicians and Surgeons of Canada Ottawa, ON 613-730-8177

Email: cos@royalcollege.ca

7. Appendices

- Procedure for Discipline Review
- Examples of major and minor areas of concern
- Process for withdrawal of recognition of a Royal College discipline

8. Record of Policy Review

| Policy number | 4.1 | |
|-------------------------|--|--|
| Most recent resolution: | 2021-18 CSE: 2021-24-11 | |
| Previous resolution(s): | Resolution No. 2020-6; CSE: 2020-12-01 | |
| Approved by: | Committee on Specialty Education (CSE) | |
| Approval Date: | November 29, 2021 | |
| Approval path: | COS, CSE | |
| Effective date: | November 30, 2021 | |
| Date of next review: | Fall 2024 | |
| Royal College Office: | Office of Specialty Education (OSE) | |
| Version status: | Revisions presented for discussion | |

| Keywords: | Discipline review, Regular Review, Monitoring Report, Focused | |
|----------------------|---|--|
| | Review, In-Depth Review, Major Discipline Changes, Discipline | |
| | Sunset; Withdrawal of Recognition | |
| Information security | Public | |
| classification | | |

<u>Appendix A – Procedure for Discipline Review</u>

Procedure for the Regular Review of Disciplines

- The OSE sends a notification of review, including questions for response, to the specialty committee chair approximately twelve months and six months before the scheduled review.
- The specialty committee chair submits a response to the OSE by the specified deadline and the OSE collates the following documents to form the review package:
 - Response from the specialty committee to standardized questions
 - One-year and six-month notifications of review
 - Discipline Status Report for the previous two years (if available), including current data on:
 - Membership of the Specialty Committee,
 - Meeting dates, type, and attendance rate,
 - Current status of discipline-specific standards,
 - CaRMS match and physician supply,
 - Exams and credentials,
 - Accreditation, and
 - Number of current trainees
 - Minutes of past three specialty committee meetings
 - Perspective from the Office of Specialty Education
- The review package is sent to one voting member of the COS for their consideration. The COS
 reviewer submits a confidential written report to the OSE, indicating their recommended
 course of action.
- The review is considered at the next COS meeting, either as a separate decision item, or as a
 component of a consent agenda containing other regular reviews, at which time the initial
 report from the COS reviewer is considered. The specialty committee chair is invited to be
 available to the committee to answer any questions. In the absence of this opportunity, the
 OSE may flag for the specialty committee any outstanding questions the COS reviewer might
 have.
- Upon this review, the COS renders one of four decisions:
 - The discipline return to regular review in approximately six years' time;
 - The discipline should be reviewed again during the next regular review with a monitoring report in approximately two years' time;
 - The discipline should proceed to a Focused Review; or
 - The discipline should proceed to an In-Depth Review.
- The OSE sends feedback and the outcome of the review, including the new discipline review status, to the specialty committee.

Procedure for Discipline Monitoring Reports

- The COS will identify the areas of focus for a discipline's Monitoring Report through the discipline review process and decide a date for the review.
- The OSE will send the specialty committee reminders of the Monitoring Report approximately one year and six months before the scheduled review.
- The specialty committee chair submits a response to the OSE by the specified deadline and the OSE collates the following documents to form the review package:
 - Monitoring Report from the specialty committee
 - One-year and six-month reminders of review
 - Any relevant materials from previous reviews, including outcome letters
 - Minutes of past three specialty committee meetings
- The review package is sent to one voting member of the COS for their consideration. The COS reviewer submits a confidential written report to the OSE, indicating their recommended course of action.
- The review is considered at the next COS meeting, at which time the initial report from the COS reviewer is considered. The specialty committee chair is invited to be available to the committee to answer any questions. In the absence of this opportunity, the OSE may flag for the specialty committee any outstanding questions the COS reviewer might have.
- Upon this review, the COS renders one of four decisions:
 - The discipline return to regular review in approximately six years' time;
 - The discipline should be reviewed again during the next regular review with a monitoring report in approximately two years' time or a timeframe stipulated by the COS;
 - The discipline should proceed to a Focused Review; or
 - The discipline should proceed to an In-Depth Review.
- The OSE informs the applicant of the final decision.

Procedure for Focused Reviews of Disciplines

- The COS will identify the areas of focus for a discipline's Focused Review through the discipline review process and decide a date for the review.
- The OSE will send the specialty committee reminders of the Focused Review approximately one year and six months before the scheduled review.
- The specialty committee chair submits a response to the OSE by the specified deadline and the OSE collates the following documents to form the review package:
 - Focused Review from the specialty committee
 - One-year and six-month reminders of review
 - Any relevant materials from previous reviews, including outcome letters
 - Minutes of past three specialty committee meetings

- Perspective from the Office of Specialty Education
- The review package is sent to two voting members of the COS for their consideration. The COS
 reviewers submit a confidential written report to the OSE, indicating their recommended
 course of action.
- The review is considered at the next COS meeting, at which time the initial report from the COS reviewers is considered. The specialty committee chair is invited to be available to the committee to answer any questions. In the absence of this opportunity, the OSE may flag for the specialty committee any outstanding questions the COS reviewers might have.
- Upon this review, the COS renders one of four decisions:
 - The discipline returns to its original regular review schedule, to take place in approximately six years' time since the previous regular review of the discipline was considered;
 - The discipline should return to another focused review;
 - The discipline should be reviewed again during the next regular review with a monitoring report in approximately two years' time;
 - The discipline should proceed to an In-Depth Review, led by the OSE.
- If a specialty committee recommends a major change to the discipline as a result of its review, the COS may also direct that this change occur by adhering to the associated policy governing the change. The specialty committee should return to the COS within a year with an application for the mandated change; or
- The OSE informs the applicant of the final decision.

Procedure for In-Depth Reviews of Disciplines

- The COS will identify the areas of focus for a discipline's In-Depth Review through the discipline review process and decide a date for the review.
- The OSE will lead a process to:
 - o collect additional data or information regarding the discipline, to inform the COS' discussions at its next meeting; and/or,
 - o strike an ad hoc working group, with broad membership beyond that of the specialty committee, and Independent Advisory Panel, to explore and produce recommendations regarding the future configuration of the discipline.
- The OSE will prepare recommendations by the specified deadline and collate the following documents to form the review package:
 - In-Depth Review and recommendations
 - Any relevant materials from previous reviews, including outcome letters
 - Minutes of past three specialty committee meetings
- The review package is sent to two voting members of the COS for their consideration. The COS
 reviewers submit a confidential written report to the OSE, indicating their recommended
 course of action.

- The review is considered at the next COS meeting, at which time the initial report from the COS reviewers is considered. The specialty committee chair is invited to be available to the committee to answer any questions.
- Upon this review, the COS renders one of three decisions:
 - The discipline return to regular review in approximately six years' time;
 - The discipline should be reviewed again during the next regular review with a monitoring report in approximately two years' time;
 - The COS identifies a way forward for the discipline and:
 - a. Directs a major change to the discipline, including a change to the discipline's status (e.g., from subspecialty to AFC or from subspecialty to primary specialty), name, entry routes or length of training, adhering to the associated policy governing the change. The specialty committee should return to the COS within a year with an application for the mandated change; or
 - b. Initiates a process to withdraw recognition of the discipline. A decision to withdraw recognition of an AFC will proceed to the next COS meeting for recommendation and subsequently to CSE for approval, while decisions to withdraw recognition of specialty, subspecialty, and fundamentals disciplines will require further consideration by ECC and final approval by Council during the next committee cycle to allow for response from the specialty committee. Upon final approval, the Royal College will withdraw recognition of the discipline in accordance with the procedures as outlined in Appendix C.
- The OSE informs the applicant of the final decision.

Appendix B – Examples of major and minor areas of concern

| Major areas of concern | Minor areas of concern |
|--|--|
| The scope of the discipline and/or practice appears to be misaligned with societal need. | The discipline is newly-recognized and there are some difficulties with its implementation. |
| There is evidence that a patient population is not well-served through the existing curriculum/organization of residency training. | There are initial questions about the functioning of the specialty committee, such as low meeting participation rates or gaps in regional representation. |
| The specialty committee does not appear to be aware of a major identified issue, e.g., systemic concerns across programs accredited in the discipline. | There are small gaps in the information provided by the specialty committee during a discipline review. |
| Reasonable actions to address an issue have not led to expected improvements. | The specialty committee is implementing changes to their discipline following a Monitoring Report or In-Depth Review, and the COS agrees it's necessary to monitor progress. |
| Leadership of the specialty committee prevents the fulfillment of its mandate and/or policy implementation. | |

Appendix C – Process for withdrawal of recognition of a Royal College discipline

Specialty, subspecialty, and fundamentals disciplines

- The COS may initiate a process to withdraw recognition of a specialty, subspecialty or fundamentals discipline via discipline review.
- The OSE will provide the specialty committee with a notice of intent to withdraw recognition of its discipline. The specialty committee chair will then submit a response to the OSE by the specified deadline, to be presented at the COS meeting in the next committee cycle.
- The OSE will launch a national consultation on the intent to withdraw recognition of the discipline, including the background/history and rationale provided by COS.
- At the same time, the OSE will directly inform the following stakeholders of the notice of intent to withdraw recognition of the discipline:
 - Impacted specialty committee(s) or AFC committee(s);
 - Postgraduate offices with active programs, and/or with programs in disciplines named in the eligibility criteria of the Competency Training Requirements (CTR) of the discipline undergoing withdrawal of recognition.
 - o Regulatory authorities.
- The OSE will provide a review package to two voting members of the COS ahead of their meeting in the next committee cycle, including:
 - o The initial COS decision to initiate withdrawal of recognition and supporting materials.
 - o Response from the specialty committee.
 - o Consultation responses.
- The review is considered by COS. The specialty committee chair is invited to be available to the committee to answer any questions.
- Upon this review, the COS renders one of three decisions:
 - The COS recommends to CSE that the Royal College should withdraw recognition from the discipline (i.e., sunset).
 - A decision on the withdrawal of recognition should be deferred, pending additional information and/or clarification.
 - The COS decides that the Royal College should <u>not</u> withdraw recognition from the discipline, and may direct the OSE to work with the discipline to address concerns identified during the discipline review and withdrawal of recognition processes.
- If withdrawal of recognition is recommended by the COS after review of national consultation responses, it is then sent to the CSE for endorsement. If endorsed by the CSE, it will proceed to the ECC, and then to the Royal College Council for final approval. If the intent to withdraw recognition is denied by any of the aforementioned bodies, the process to withdraw recognition of a Royal College discipline will not proceed through the rest of the approval procedure.
- The OSE informs the specialty committee, and all stakeholders engaged during the withdrawal of recognition process, of the final decision.

- If Council decides that the Royal College will withdraw recognition of a discipline, the Royal College will broadly communicate the outcome to its stakeholders, and the implications for regulatory bodies, institutions, programs, and trainees, as per the policies governing accreditation, examinations, and credentialing.
- If Council decides that the Royal College will withdraw recognition of a discipline, the specialty committee may appeal using the *Appeal Policy and Procedure: Major COS Applications*, provided the appeal criteria are met. If the appeal is denied or the specialty committee chooses not to pursue an appeal, a new application for recognition of the sunset discipline may not be considered for three years after Council's decision.

Areas of Focused Competence

- The COS may initiate a process to withdraw recognition of a recognized AFC discipline via discipline review.
- The OSE will provide the AFC Committee with a notice of intent to withdraw recognition of its discipline. The AFC Committee chair will then submit a response to the OSE by the specified deadline, to be presented at the COS meeting in the next committee cycle.
- The OSE will issue a public notice of intent to withdraw recognition of the discipline and directly inform:
 - o Impacted specialty committee(s) or AFC committee(s);
 - Postgraduate offices with active programs, and/or with programs in disciplines named in the eligibility criteria of the Competency Training Requirements (CTR) of the discipline undergoing withdrawal of recognition.
 - o Regulatory authorities.

Interested parties are given 60 days to submit their comments following this notification.

- The OSE will provide a review package to COS ahead of its meeting in the next committee cycle, including:
 - o The initial COS decision to initiate withdrawal of recognition and supporting materials.
 - Response from the AFC Committee.
 - o Comments received from the public notice of intent or targeted communications.
- The review is considered by COS. The AFC Committee chair is invited to be available to the committee to answer any questions.
- Upon this review, the COS renders one of three decisions:
 - The COS recommends to CSE that the Royal College should withdraw recognition from the discipline (i.e., sunset).
 - o A decision on withdrawal of recognition should be deferred, pending additional information and/or clarification.
 - The Royal College should <u>not</u> withdraw recognition from the discipline, and the OSE should work with the discipline to address concerns raised during the discipline review and sunset process.

- If withdrawal of recognition is recommended by the COS after review of national consultation responses, it is then sent to the CSE for final approval.
- The OSE informs the AFC Committee, and all stakeholders engaged during the withdrawal of recognition process, of the final decision.
- If the CSE decides that the Royal College will withdraw recognition of a discipline, the Royal College will broadly communicate the outcome to its stakeholders, and the implications for regulatory bodies, institutions, programs, and trainees, as per the policies governing accreditation, examinations, and credentialing.
- If CSE decides that the Royal College will withdraw recognition of a discipline, the AFC Committee may appeal using the *Appeal Policy and Procedure: Major COS Applications*, provided the appeal criteria is met. If the appeal is denied or the AFC Committee chooses not to pursue an appeal, a new application for recognition of the sunset discipline may not be considered for three years after CSE's decision.