

## POSTGRADUATE MEDICAL EDUCATION

### SCHULICH SCHOOL OF MEDICINE & DENTISTRY

# PRE-ENTRY ASSESSMENT PROGRAM (PEAP) POLICY FOR INTERNATIONALLY SPONSORED TRAINEES AND IMG FELLOWS

**Approved by PGME Committee:** March 10, 2021

**Approved by ECSC:** April 9, 2021

**Date of Next Scheduled Review:** 2024

### Preamble

The Pre-Entry Assessment Program (PEAP), a legislative requirement under the Medicine Act (1991), is a 4- to 12-week period of assessment to determine if the candidate can function at their appointed level of training prior to full acceptance into a training program.

### Purpose

The PEAP is designed for International Medical Graduates (IMG). An IMG is a candidate who graduated from a non-LCME/CACMS medical school.

The PEAP provides an assessment of the candidate's general knowledge and competency in the specialty and at the level in which she/he is certified, and appropriate for practice in the discipline in which the candidate is entering resident or fellowship training.

The PEAP provides an opportunity for the Program Director, RPC, or fellowship supervisors to:

- Assess the candidate's basic skills appropriate for supervised practice in the chosen discipline.
- Ensure that the candidate is: mentally competent to practice medicine; has the ability to practice with decency, integrity and honesty and in accordance with the law; has sufficient knowledge, skills and judgment to engage in the kind of medical practice authorized by the certificate, can communicate effectively and displays an appropriately professional attitude.

Successful completion of the PEAP is a requirement for full acceptance into residency training for IMGs who enter residency training outside the CaRMS match. The resident PEAP training period cannot be counted towards Royal College or Family Medicine certification.

Successful completion of the PEAP is also a requirement for IMGs entering clinical fellowship. A successful fellowship PEAP training period is counted toward total fellowship training time.

A 14-day PEAP is also required for elective residency training if the elective IMG's home residency program is outside of Canada or the United States.

## PEAP Exemption

Internationally sponsored residents who have graduated from a Canadian medical school are exempt from the PEAP requirement. IMG Clinical Fellows who have previously completed postgraduate training in Canada are also exempt from the PEAP, but the training program can decide to require that the fellow complete a new PEAP.

## Policy References

- [Council of Ontario Universities PEAP Policy](#)
- [CPSO PEAP Exemption Requirements](#)

## Licensure

The candidate must hold a valid certificate of registration authorizing postgraduate education from the College of Physicians and Surgeons of Ontario (CPSO) before they are able to begin the PEAP.

The PEAP candidate may practice medicine only:

- a) in a clinical teaching unit that is formally affiliated with the Ontario medical school and only as part of a system in which postgraduate trainees are regularly assigned by the program to that clinical teaching unit;
- b) to the extent required to complete the pre-entry assessment program to which the holder is appointed; and
- c) under a level of supervision that is determined to be appropriate for the holder and the program of medical education and assessment, by a member of the College designated by the director of the program;
- d) may not charge a fee for medical services.

A candidate who is not successful in the PEAP will have their CPSO certificate of registration terminated effective of the end date of the PEAP as indicated on the final assessment form. The residency or fellowship appointment is also terminated effective the same date.

## Length of the PEAP

The program will determine the length of the PEAP required to fully assess the trainee; it must be a minimum of 4 weeks and a maximum of 12.

## PEAP Extension

Extensions of the PEAP of up to 4 weeks may be made if a full opportunity for assessment has not been possible; for example, illness of the trainee, temporary unavailability of the supervisor, or insufficient clinical opportunities during the program. Extensions are not possible for the purpose of remedial training.

Requests for PEAP extension beyond 12 weeks must be made to PGME and require a letter from the Program Director or PEAP supervisor. PGME will provide the documentation to the CPSO for consideration.

## Supervision

Programs should ensure their PEAP learners are scheduled for rotations that allow for assessment in all of the competencies outlined in the final PEAP assessment form.

## Assessment

- During the PEAP period the learner must be assessed regularly (approx. every 2 weeks). These interim assessments should be used as a reference when completing the final [PEAP assessment form](#).
- Any concerns with respect to a potential unsatisfactory outcome of the PEAP must be communicated to PGME Office as soon as the Program is aware that the candidate is not meeting expectations. Additional written documentation and assessments will be required, and the candidate must be made aware of the concerns.
- Any allegations of unprofessional conduct against a candidate in the PEAP, and/or conduct that gives rise to concerns about patient care or safety should be brought to the attention of the Associate Dean PGME.
- The final PEAP assessment form is provided by PGME ([resident form](#), [fellow form](#)) and must be completed by the learner's main supervisor and signed off by the Program Director or Fellowship Program Supervisor (the PD may sign off as both supervisor and PD). The program must review the final assessment with the learner, and the learner must sign the assessment before the program submits it to PGME.
- The program must send the learner's completed final PEAP assessment form to the PGME office **5 business days** prior to the PEAP completion date. If a PEAP extension is required (up to a maximum of 4 weeks) the program must notify PGME as soon as possible to initiate an extension request with CPSO.
- PGME will review the final PEAP assessment for errors, obtain the PGME Dean's signature, and submit the completed final PEAP assessment to the CPSO.

## Vacation Requests during the PEAP

The PEAP is a high stakes assessment over a short period of time, vacation time is strongly discouraged during this period and may put the candidate's assessment in jeopardy.

## Possible Outcomes

1. **Satisfactory**  
The PEAP candidate continues in the postgraduate training program.
2. **Unsatisfactory**  
Failure to meet expectations in any area of the PEAP assessment will result in an unsuccessful PEAP. A candidate with an unsatisfactory assessment has his/her appointment with the University terminated.
3. **Withdrawal**  
A PEAP candidate may choose to withdraw from the PEAP at any time.

## Reapplication of Unsatisfactory/Withdrawn Candidates

If the PEAP is not completed successfully CPSO regulations prevent enrolment in a subsequent PEAP in Ontario in the same discipline.

## Professional Conduct

PEAP candidates are expected to adhere to the standards of ethical behaviour for the medical profession, and their professional activities are expected to be characterized by honesty, integrity, conscientiousness and reliability. Behaviour which violates these principles is viewed as a demonstration of lack of suitability

for satisfactory completion of the PEAP and ongoing training in a residency or fellowship program. Unprofessional conduct may result in termination and dismissal from the PEAP.

## Appeal

An unsuccessful PEAP is open to appeal on procedural (process) grounds only.

### *Appeal of an Unsatisfactory PEAP Final Assessment*

1. PEAP candidates may choose to appeal an unsatisfactory final assessment or suspension based on process issues only.
2. A candidate may appeal the following decisions to the Schulich Postgraduate Medical Education Appeal Committee (“the Committee”):
  - a) an unsatisfactory assessment at the end of the PEAP resulting in termination of a candidate’s appointment with the University
  - b) a decision by the Associate Dean PGME to terminate a candidate’s appointment with the University because he or she has engaged in unprofessional conduct and/or has jeopardized patient care or safety.
3. A candidate may appeal on the following grounds:
  - a) for an appeal under section 1(a), that there was a significant error in the PEAP process that could reasonably be seen to cast doubt on the correctness of the final assessment;
  - b) for an appeal under section 1(b), that the Associate Dean PGME did not take into consideration relevant information or that the decision cannot be supported on the information that was before the Associate Dean PGME.
4. An appeal must be submitted to the PGME Office within two weeks of the issuance of the decision and include the following:
  - a) a copy of relevant assessments (if applicable)
  - b) a copy of the decision
  - c) the grounds of appeal and remedy sought, and
  - d) a full statement supporting the grounds of appeal and any relevant documentation.
5. The PGME Office shall forward copies of the appeal documentation to the respondent (Program Director and/or Associate Dean PGME) who shall file a concise written reply with relevant documentation within two weeks of the filing of the appeal. A copy of the reply shall be provided to the candidate.
6. Where circumstances warrant, the deadlines for filing an appeal or response may be extended at the discretion of the Chair of the Committee.
7. The PGME Office shall forward the documentation provided by the candidate and respondent to the Committee.
8. The Committee shall determine its own procedures for hearing an appeal and the Chair of the Committee may make such rules and orders as he or she deems necessary and proper to

- ensure a fair and expeditious proceeding. The candidate shall be informed of the procedures that will be followed.
9. The Committee shall proceed fairly in its disposition of the appeal, ensuring that both the candidate and the respondent are aware of the evidence to be considered.
  10. The Committee shall provide the parties to the appeal with an opportunity to meet with the Committee and bring witnesses. Both parties and their witnesses may be cross-examined by the other party and both parties may be represented by legal counsel.
  11. The Committee shall issue a written decision with reasons and may:
    - a) deny the appeal;
    - b) grant the appeal of the assessment (section 1(a)) if it is persuaded that there was a significant error in the assessment verification period process that could reasonably be seen to cast doubt on the correctness of the final assessment and allow the candidate to repeat the PEAP process or part of the process (subject to any required CPSO approval) and may provide recommendations to the program on the conduct of the process;
    - c) grant the appeal of the Associate Dean PGME's decision (section 1(b)) if it is persuaded that the Associate Dean PGME did not take into consideration relevant information when making the decision and remit the matter to the Associate Dean PGME for reconsideration; or
    - d) grant the appeal if it is persuaded that the Associate Dean PGME's decision (section 1(b)) cannot be supported on the information that was before the Associate Dean PGME and reinstate the candidate.
  12. A decision to deny the appeal may be appealed to the Dean, Schulich School of Medicine & Dentistry, on the grounds that there was a significant procedural error by the Schulich Postgraduate Medical Education Appeal Committee that was prejudicial to the candidate and casts doubt on the fairness of those proceedings. The Dean may delegate his or her authority to hear and decide the appeal to another individual or individuals or to a committee. References to "Dean" in this part mean "Dean or delegate".
  13. An appeal must be submitted to the Dean's Office, Schulich School of Medicine & Dentistry, within two weeks of the issuance of the Committee's decision and include the following:
    - a) a copy of the Committee's decision;
    - b) the grounds of appeal and remedy sought, and
    - c) a full statement supporting the grounds of appeal and any relevant documentation.
  14. The Dean's Office shall forward copies of the candidate's appeal documentation to the respondent (Program Director or Associate Dean PGME) who shall file a concise written reply with relevant documentation within two weeks of the filing of the appeal. A copy of the reply shall be provided to the candidate.
  15. Where circumstances warrant, the deadlines for filing an appeal or response may be

extended at the discretion of the Dean.

16. The Dean shall base his or her decision solely on the written material filed by the parties. The Dean shall issue a written decision with reason and may:
- a) deny the appeal; or
  - b) grant the appeal and send the matter back to the Committee with specific directions for rehearing all or part of the appeal or make such other order as he or she deems appropriate.

**The Dean's decision is final and there is no further right of appeal at the University.**