



# Exemptions to CPSNL Registration

Physicians who are already licensed to practice medicine in another Canadian province or territory may, in certain circumstances, provide medical services in Newfoundland and Labrador (NL) **without applying for CPSNL Registration**.

Exemptions are **limited and specific** to the intended purpose and only apply when all required conditions are met.

If your intended work is regular, ongoing, involves direct care, or takes place while you are physically located in NL, a licence from CPSNL will likely be required.

## Exemption Categories

Situation	Additional Requirements
Virtual Care to NL Patients	<ul style="list-style-type: none"><li>• Maximum 90 days per calendar year</li><li>• Physician must <b>not</b> be physically located in NL while providing virtual care</li><li>• You must hold a full licence (or equivalent) in another Canadian province/territory.</li><li>• The work must fall within the scope of practice permitted by your home jurisdiction.</li><li>• You must hold professional liability insurance (e.g. CMPA).</li><li>• No outstanding disciplinary matters in any jurisdiction.</li></ul>
Canadian Armed Forces/National Defence*	<ul style="list-style-type: none"><li>• Practice must be for Canadian Armed Forces or National Defence duties as employee or contractor</li><li>• You must hold registration or licensure in another jurisdiction.</li><li>• The work must fall within the scope of practice permitted by your home jurisdiction.</li><li>• You must hold professional liability insurance.</li></ul>
Patient Transport to Provincial Health Authority Facility*	<ul style="list-style-type: none"><li>• Applies only to the transport event</li><li>• You must hold registration or licensure in another jurisdiction.</li></ul>
Continuing Professional Development (CPD)	<ul style="list-style-type: none"><li>• The CPD activity must be sponsored by the Provincial Health Authority</li><li>• No direct patient care involved</li><li>• You must hold registration or licensure in another jurisdiction.</li><li>• The work must fall within the scope of practice permitted by your home jurisdiction.</li><li>• You must hold professional liability insurance.</li></ul>

Medical Teaching / Training / Education	<ul style="list-style-type: none"> <li>• Must be at request of the Faculty of Medicine (Memorial University of Newfoundland)</li> <li>• No direct patient care involved</li> </ul>
Providing Testimony	<ul style="list-style-type: none"> <li>• Applies to civil, criminal, or regulatory matters</li> <li>• No direct patient care involved</li> </ul>

If your planned work does not fit these categories or if you are unsure about your eligibility, please contact [licensing@cpsnl.ca](mailto:licensing@cpsnl.ca).

\*Note: Physician Assistants also qualify under these exceptions.

## Frequently Asked Questions

### **1. Do I need to apply to CPSNL to use one of these exemptions?**

No formal application is required, but you are expected to ensure you meet all eligibility criteria and to be able to provide proof of licensure, insurance, and scope of practice on request.

### **2. How do I count the “90 days per calendar year” for virtual care?**

The 90-day limit refers to days on which you provide virtual care to patients located in Newfoundland and Labrador, not the number of patients or hours.

- If you provide care on three separate days, that counts as three days.
- The limit resets on January 1 of each calendar year.

If your virtual care will exceed 90 days or becomes part of an ongoing practice, you will need to apply for licensure.

### **3. Can I provide virtual care while I’m in Newfoundland and Labrador under the virtual care exemption?**

No. The virtual care exemption applies only when you are physically outside Newfoundland and Labrador while providing care.

### **4. I’m doing CPD/education that includes supervised patient contact. Is that covered?**

No. The exemptions for Continuing Professional Development (CPD) and Medical Teaching/Training/Education apply only when there is no direct patient care.

If your role includes assessing, diagnosing, treating, or otherwise directly caring for patients, you will require CPSNL licensure.

## **5. I'm a Physician Assistant. Do these exemptions apply to me?**

Physician Assistants can qualify for exemption under two of the exemptions:

1. providing services for the Canadian Armed Forces or National Defence
2. providing medical transport.

## **6. I am doing a short-term locum in Newfoundland and Labrador. Can I rely on these exemptions?**

No. If you are going to be physically located in NL and providing patient care, you will need to obtain CPSNL licensure for locum work, regardless of how short the placement is

## **7. Do these exemptions override hospital or health authority credentialing requirements?**

No. These exemptions relate only to the licensing requirement under the *Medical Act, 2011*. Hospitals, the Provincial Health Authority, the Canadian Armed Forces, and other organizations may still have their own credentialing or privileging processes.

You are responsible for meeting all applicable organizational requirements in addition to any CPSNL requirements.

## **8. What should I do if I'm not sure whether my situation fits an exemption?**

If your planned work:

- Doesn't clearly fit one of the situations listed above, or
- Has mixed elements (e.g., some education and some patient care),

please contact CPSNL before you begin providing services.

If your planned work does not fit these categories or if you are unsure about your eligibility, please contact [licensing@cpsnl.ca](mailto:licensing@cpsnl.ca).