PATHWAY 3 PLAN GUIDE

For the development and verification of Pathway 3 clinical mentorship plans

As an International Organisation, IBLCE uses British English in its publications.
This guide provides information about how to develop a Pathway 3 Plan. **It is not intended as a guide about how to apply for the IBLCE exam.** For more information about applying for the exam, please consult the *Candidate Information Guide*.

I. **What is IBLCE?** ................................................................. 3  
   A. **Contact Information** ..................................................... 3

II. **Purpose of this Guide** ..................................................... 3  
    A. **Key Dates** ..................................................................... 3
    B. **Application and Other Related Forms** .......................... 4
    C. **Applying for the Exam** ................................................. 4

III. **Directly Supervised Clinical Practise** .................................. 4  
    A. **Phase 1** ........................................................................ 5
    B. **Phases 2 and 3** .............................................................. 5
    C. **Record Keeping** ............................................................. 6

IV. **Applicant Responsibilities** .................................................. 6  
    A. **Finding a Mentor** .......................................................... 7
    B. **Professional Responsibilities** ........................................... 7

V. **Mentor Responsibilities** ..................................................... 8  
   A. **CERPs for Mentors** ........................................................ 9

VI. **Pathway 3 Plan Development** ............................................ 9

VII. **Alternative Learning Activities** ......................................... 9

VIII. **Ongoing Pathway 3 Plan Evaluation** .................................. 11

IX. **Financial Considerations** ................................................... 12

X. **Frequently Asked Questions** ............................................... 12

Pathway 3 Mentor Agreement Form .............................................. 14

Report of Pathway 3 Clinical Practice Hours .............................. 15

Pathway 3 Time Sheet ................................................................ 16

Application for CERPs Award to Pathway 3 Mentors .................. 17

Pathway 3 Plan Verification Fee Schedule .................................... 18
I. What is IBLCE?

IBLCE®, or the International Board of Lactation Consultant Examiners®, is the independent international certification body conferring the International Board Certified Lactation Consultant® (IBCLC®) credential.

A. Contact Information

International Board of Lactation Consultant Examiners (IBLCE)
10301 Democracy Lane, Suite 400
Fairfax, Virginia 22030
Phone: 703-560-7330
Fax: 703-560-7332
www.iblce.org

IBLCE has locations in Austria, Australia and the United States. You may reach the IBLCE location that serves your country of residence by using the contact information found on the IBLCE website.

II. Purpose of this Guide

Pathway 3 is distinguished from the other IBLCE exam eligibility pathways by requiring the applicant to complete a clinical practice mentorship under the direct supervision of IBCLC certificants who serve as mentors. Individuals who want to follow Pathway 3 must first submit a plan to IBLCE for how they will complete the required directly supervised clinical practice hours in lactation and breastfeeding care.

Before the directly supervised clinical practice mentorship begins, IBLCE must verify the certification status of the IBCLC certificants who will serve as mentors. The purpose of this guide is to assist individuals in developing their Pathway 3 Plans.

A. Key Dates

Pathway 3 Plan verification is valid for 5 years. Individuals with verified Pathway 3 Plans must meet all IBLCE exam eligibility requirements in place at the time of applying for the exam.
B. Application and Other Related Forms

The Pathway 3 Plan Verification Packet is available in the same languages as IBLCE offers the examination. Visit the IBLCE website and locate your language. English applications are available in the online credential management system.

Plans must be verified by IBLCE before the applicant begins to accumulate the required minimum of 500 directly supervised clinical practice hours.

IBLCE will send notification of Pathway 3 Plan verification by email. Please allow 2 weeks for verification of your Pathway 3 Plan to be completed.

Pathway 3 Plan applications may be submitted year-round. There is a fee for application verification and the amount can be found on the last page of this document.

C. Applying for the Exam

In addition to a minimum of 500 hours of directly supervised clinical practice in lactation care, Pathway 3 applicants must also complete education in the health sciences and education that is specifically about human lactation and breastfeeding. For more information about the Health Sciences Education and Lactation Specific Education requirements, please consult the Candidate Information Guide, which can be found on the IBLCE website.

Important! Application for the IBCLC exam must occur within the 5 years immediately following IBLCE verification of the Pathway 3 Plan.

III. Directly Supervised Clinical Practice

Pathway 3 clinical practice hours must be directly supervised by mentors who are currently certified IBCLC certificants in good standing. Direct supervision is defined as a gradual, three-phase process that:

1. Begins with observation of the IBCLC mentor at work.
2. Moves to clinical practice experience under the direct observation of the IBCLC mentor (i.e. the IBCLC mentor must be in the room with the applicant) until the skill is mastered.
3. Culminates with independent practice by the applicant, with the IBCLC mentor physically nearby to assist if needed.
Important! IBCLC certificants providing supervision must be physically nearby and able to step in if the Pathway 3 applicant needs assistance. IBCLC mentors may not supervise via the phone.

Only those hours spent completing directly supervised clinical practice that involves direct interaction with breastfeeding mothers and children may be counted toward the required 500 hours minimum. Hours of clinical experience obtained prior to Pathway 3 Plan verification; hours obtained outside of the Pathway 3 Plan through work or volunteer experience; hours observing IBCLC certificants at work and/or hours spent in completing alternative learning activities may not be counted toward fulfilling Pathway 3 requirements.

A. Phase 1

Observation of the IBCLC mentor(s) at work must occur before the Pathway 3 applicant works directly with breastfeeding families.
☐ At the discretion of the supervising IBCLC, this observation may occur in conjunction with written assignments or coursework and may be undertaken before the Pathway 3 Plan is verified.
☐ Clinical observation of the IBCLC mentor does not count toward the minimum requirement of 500 directly supervised clinical practice hours.

B. Phases 2 and 3

Practice obtained under phases 2 and 3 of direct supervision may be counted toward the required 500 hours of directly supervised clinical practice. The directly supervised clinical practice may be undertaken only after the Pathway 3 Plan is verified by IBLCE.

Please Note: Due to the need to observe mentors and/or complete alternative learning assignments, completion of the Pathway 3 Plan will require more than 500 hours of the applicant’s time. This should be taken into consideration when planning for IBLCE exam application.

Actual practice by the applicant is required in Phases 2 and 3 of direct supervision. This means that the applicant provides the care with the IBCLC mentor either in the room or nearby to provide assistance. IBLCE recommends that the directly supervised clinical practice hours be obtained in at least 3 settings.
- Hours accumulated in phases 2 and 3 **may be** counted toward the minimum requirement of 500 directly supervised clinical practice hours.
- The Pathway 3 Plan **must be verified** before the applicant can count the Phase 2 and 3 directly supervised clinical practice hours.
- The applicant should not be allowed to practice independently (Phase 3) until the IBCLC mentor(s) have determined that the applicant knows the limits of her/his knowledge and skill. Knowing when to ask for help is essential to the applicant’s demonstration of the specialised knowledge required of IBCLC certificants.
- Directly supervised clinical practice hours must be accumulated in every duty listed on the *Clinical Competencies for the Practice of International Board Certified Lactation Consultants*.
  - The number of directly supervised clinical practice hours accumulated in every duty must be recorded on the *Pathway 3 Clinical Practice Hours Report* and verified by the Chief Mentor.

It is important that applicants practice in settings that will give them an opportunity to work with mothers and children across the chronological spectrum from pre-conception through weaning. IBLCE recommends that the directly supervised clinical practice hours be obtained in at least 3 settings. Most of the applicant’s experience should be obtained by providing direct in-person care. Telephone and email counselling should be kept to a minimum.

**C. Record Keeping**

It is important to keep accurate records of your directly supervised clinical practice hours. When applying for the IBLCE exam, your application may be randomly chosen for audit. If your exam application is audited, you will be required to submit additional documentation. Keep an accurate record of your clinical practice by using the *Pathway 3 Time Sheet* and the *Pathway 3 Directly Supervised Clinical Practice Hours Report*. These forms can be found at the end of this document.

**IV. Applicant Responsibilities**

Pathway 3 applicants must:
- Locate and contract with IBCLC certificants who will serve as mentors
and choose one IBCLC to serve as the Chief Mentor.

- **Please Note:** IBLCE does not maintain a list of IBCLC certificants willing to be mentors and due to restrictions in the IBLCE Privacy Policy, IBLCE staff is not able to provide assistance in locating mentors. Pathway 3 applicants are advised to network within their community to locate experienced IBCLC certificants who are willing to be mentors.

- **Recommendation:** Contracting with more than one mentor is advisable and gives the applicant the advantage of observing and learning from more than one experienced IBCLC.

- Establish a business relationship with the IBCLC certificants who will serve as mentors.

  - **Please Note:** Cost of mentorship varies and is part of the business relationship between the applicant and the mentors. IBLCE is not responsible for the terms of this business relationship.

- Meet the mentor’s or the practice setting’s requirements regarding professional liability insurance, immunisation certificates, health exam, etc.

- Notify IBLCE in writing if for any reason the applicant and/or mentor decide to terminate the plan prior to completion or if it becomes necessary to add or change mentors.

  - If adding or changing mentors becomes necessary, it is the applicant’s responsibility to notify IBLCE of the change and obtain a completed Mentor Agreement Form for any new mentors.

### A. Finding a Mentor

Applicants must locate and contact potential mentors directly. At present, there is no central source for such information. IBLCE staff **cannot** provide Pathway 3 applicants with the names and contact information of potential mentors in their community.

### B. Professional Responsibilities

Pathway 3 applicants are expected to adhere to certain basic principles of professional and ethical practice, including but not limited to:

- Conduct herself/himself in a professional manner at all times, adhering to all principles of the IBLCE *Code of Professional Conduct for International Board Certified Lactation Consultants*.

- Ensure that proper health, safety and insurance standards are
met at all practice settings.

- Complete written work promptly and in compliance with the mentor’s requirements.
- Obtain permission from the client to observe, assist and/or provide lactation care.
- Keep accurate records of the time spent completing the Pathway 3 plan.
- Abide by any requirements of the clinical placement site where the directly supervised clinical practice in lactation and breastfeeding care is obtained.

V. Mentor Responsibilities

One mentor must agree to serve as the primary supervisor (Chief Mentor) of the Pathway 3 Plan. The Chief Mentor is responsible for:

- Creating and executing a Pathway 3 Plan which covers all of the duties listed on the Clinical Competencies for the Practice of International Board Certified Lactation Consultants.
- Working together with the applicant to complete the Pathway 3 Plan Application form.
- Securing the practice settings in which the applicant will obtain the directly supervised clinical practice hours.
- Supervising the other mentors who are providing direct supervision of the applicant’s clinical practice.
- Reporting to IBLCE the percentage of time each mentor provided direct supervision to the Pathway 3 applicant. This report must be submitted when the Pathway 3 Plan is completed and is for the purpose of awarding Continuing Education Recognition Points (CERPs) to mentors.

IBCLC certificants who serve as Pathway 3 mentors are expected to demonstrate and model the highest professional standards. Their commitment must extend beyond the breastfeeding dyad to teaching the Pathway 3 applicant under their supervision. Each Pathway 3 mentor must:

- Be a currently certified IBCLC in good standing.
- Complete and submit a Pathway 3 Mentor Agreement Form to the applicant.
- Provide a period of time during which the Pathway 3 applicant observes their practice before allowing the applicant to provide hands-on care to breastfeeding families.
- Directly supervise the applicant’s clinical practice and determine the degree to which the applicant has mastered the clinical skills being practiced before permitting the applicant to practice independently.
- Log the clinical practice hours that the applicant has accumulated under their direct supervision by completing and signing a Pathway 3 Time Sheet.
- Assign additional learning activities, reading and/or written assignments to the applicant, as needed.
- Provide a reference for the Pathway 3 applicant, upon request.

Please Note: Relatives of the Pathway 3 applicant may not serve as mentors. It is a conflict of interest for a relative of the Pathway 3 applicant to be that applicant’s mentor.

A. CERPs for Mentors

IBCLC certificants who serve as mentors for approved Pathway 3 Plans may receive CERPs for their service. For the purposes of CERP allocation, each Pathway 3 Plan is eligible for a total of 25 L-CERPs. Over any given 5-year period of time, IBCLC certificants may acquire up to a maximum of 50 L-CERPs for their service as mentors to applicants who complete their approved Pathway 3 Plan.

CERPs will be allocated on the basis of the percentage of time each mentor provided direct supervision to the applicant following Pathway 3. The Chief Mentor will be responsible for reporting these percentages to IBLCE. Based upon this report, IBLCE will notify the Chief Mentor of the number of CERPs each mentor earned.

VI. Pathway 3 Plan Development

The Chief Mentor is expected to work with the Pathway 3 applicant to develop a plan for covering all of the duties listed on the Clinical Competencies for the Practice of International Board Certified Lactation Consultants. Making provisions for practice in several settings is important to well-rounded education in the clinical competencies. IBLCE recommends that applicants obtain clinical practice in at least 3 different practice settings.

VII. Alternative Learning Activities

The assignment of other activities such as literature research or watching instructional videos may be needed in order for applicants to be exposed to all of the clinical skills. These alternative learning activities may be necessary but ONLY those hours spent in directly supervised clinical practice that involves direct interaction with breastfeeding mothers and children may count toward
the required minimum of 500 hours.

These alternative learning activities are intended as suggestions to applicants and mentors. Pathway 3 Plans may include other learning activities agreed upon by the mentor and applicant.

- Attend a childbirth conference, a seminar conducted by a professional association, or sessions presented by a lawyer, a dietician, or a human relations counsellor.
- Study the anatomy and physiology of the breast in detail, including how milk is synthesised.
- Learn about infant oral anatomy and development (or other topics) and write a report.
- Make a presentation to your colleagues on the biochemistry of human milk, or a similar challenging topic.
- Observe the interaction of a mother and baby during the first two hours after birth. Compare the baby of a mother who used no medication during labour with the baby of a mother who used pain relief medication.
- Attend a variety of mother-to-mother support meetings to observe mothers and babies and to learn more about the wide range of normal breastfeeding experiences. Observe the group counsellors, listen, ask questions, practice ethics, etc.
- Observe the developmental milestones of babies and young children in a casual setting. You might spend time at a playground, a playgroup or a mother support gathering watching the interactions of mothers and babies/toddlers. Estimate the ages of babies/toddlers by observing their developmental activity level.
- Take a professional ethics class or attend a seminar on health privacy issues relevant to your country, community or practice setting.
- Do a study of the normal growth, development and breastfeeding behaviour of a single baby over a six-month period.
- Join a study group that critically reads peer-reviewed journal articles on breastfeeding to learn more about research techniques and evidence-based practice.
- Attend a Baby Friendly Hospital Initiative (BFHI) course. Review hospital practices to see how breastfeeding-friendly they are. What types of breastfeeding problems might arise as the result of poor hospital practices? How might these problems be prevented?
- Join your local professional lactation consultant organisation for support, information and educational opportunities.
- Complete tests, quizzes, and/or projects related to reading or clinical practice hours.
- Participate in role-playing exercises.
- Complete hypothetical charting exercises and practice writing reports to the primary health care provider.
- Complete a series of training sessions in multicultural counselling skills.
- Communicate with other health professionals, both supportive of and resistant to breastfeeding programs and practices.
- Discuss the difference between telephone counselling and in-person consultation, with particular emphasis on the fine art of telephone triage and recognizing critical situations.
- Dialogue with your mentors about difficult challenges such as helping mothers of babies with disabilities, unexpected birth trauma, neonatal death, child abuse, medical emergencies, etc.
- Participate in discussions about how to work with other health care professionals as an effective, respected member of the lactation care team.

**VIII. Ongoing Pathway 3 Plan Evaluation**

Periodic evaluation is essential to the Pathway 3 Plan. Challenging situations such as poor work habits, unprofessional behaviour, or poor clinical knowledge or counselling skills may arise between applicant and mentor. The Pathway 3 applicant and mentor(s) should have regular evaluation meetings.

Whether the evaluation occurs daily, weekly, bimonthly or monthly, establishing a schedule of meetings for the purpose of working through such challenges is important. Although evaluation time cannot be counted toward the directly supervised clinical practice requirement, it is imperative that time for evaluation be planned.
IX. Financial Considerations

Pathway 3 applicants are responsible for locating and contracting with IBCLC mentors, and one mentor must agree to serve as Chief mentor. IBLCE strongly recommends that the applicant and mentor sign a written agreement before the mentoring services begin. IBLCE is not able to provide assistance in locating mentors. Applicants are advised to network within their community to locate IBCLC certificants willing to serve as mentors.

The agreement reached, and fulfilment of it, is the sole responsibility of the parties involved. IBLCE cannot serve as a negotiator, arbitrator, legal counsel, or collection agency for either the Pathway 3 applicant or mentor.

Cost of mentorship varies and is part of the business relationship between the applicant and her/his mentor(s). The Pathway 3 applicant is responsible for obtaining professional liability insurance, immunisation certificates, health exam, etc. required by the mentor and/or practice setting. As is the case in preparing for any career, the Pathway 3 applicant must expect to incur expenses such as, but not limited to, textbooks, insurance, seminars and workshops, and mentor’s fees.

X. Frequently Asked Questions

Can I get credit for clinical practice accumulated prior to verification of my plan or may I use my on-the-job experience? No. Your plan must be verified before you begin accumulating the directly supervised clinical practice hours and you may not combine on-the-job experience with directly supervised experience in order to meet the 500 hour requirement. You may observe your mentor(s) before the plan is verified but you must wait for notification that your plan has been verified to begin counting the directly supervised clinical practice hours.

What is the Pathway 3 Application deadline? Pathway 3 Plan applications may be submitted year round.

Can any portions of the Clinical Competencies for the Practice of International Board Certified Lactation Consultants be omitted? No. You are expected to demonstrate to your mentor that you are skilled in all the clinical competencies.

Where can I obtain the clinical experience? Hours may be accumulated in any setting which affords the opportunity for hands-on, directly supervised clinical
practice. Locations may include, but are not limited to, hospitals, birthing centres, physician’s offices, public health clinics and private lactation consultant practices. IBLCE recommends that you obtain experience in at least 3 different settings.

**My local hospital will not permit me to provide care to their patients.**

**What can I do?** Be sure to verify that the places where you will be working with breastfeeding families will allow you to provide hands-on care. Some hospitals and clinics will allow observation by Pathway 3 applicants but will not allow the applicant to actually practice, even with the mentor present. You and your mentor will need to work together to find appropriate clinical placement settings that will allow you to actually provide care to breastfeeding families, not just observe them.

**Can the required minimum 500 directly supervised clinical practice hours be reduced by experience or other means?** No. All Pathway 3 applicants must complete the 500 hours of directly supervised clinical practice minimum requirement.

**Can the hours I spend observing IBCLC certificants at work be counted?** No. You may count only those hours that you have spent actually providing lactation care under the direct supervision of your mentor(s).

**Am I required to be a nurse or other health professional to qualify under Pathway 3?** No. Individuals from a broad variety of backgrounds may qualify through Pathway 3.

**My mentor works in a retail store which sells and rents breast pumps. May I count the practice hours I obtain while helping customers?** No. Hours helping clients choose which products to purchase or rent cannot be used toward meeting the Pathway 3 requirements.

**Can Pathway 3 be undertaken by anyone, anywhere in the world?** Yes, with limitations. Certain local or regional laws and regulations may require that Pathway 3 applicants meet other requirements besides those listed in this guide. IBLCE staff can provide you with more information about such additional requirements.

**Can additional mentors be added to my Pathway 3 Plan?** Yes. Once your Pathway 3 Plan is approved, it is possible to add additional mentors. Ensure that you get a signed *Mentor Agreement Form* from your new mentor(s).
Pathway 3 Mentor Agreement Form
Please print neatly.

All mentors must complete a Pathway 3 Mentor Agreement Form and return the completed form to the Pathway 3 applicant.

Pathway 3 Applicant’s Name ______________________________

Mentor Information

First Name _____________________________ Last Name ______________________________

Street Address ________________________________________________________________

City __________________________ State/Province ________________________________

Postal Code __________________________ Country __________________________________

Work Phone __________________________ Home Phone ____________________________

Email ________________________________

IBCLC ID # __________________________

Current Place of Employment: __________________________________________________

Will you be serving as the Chief Mentor? (Circle one.) Yes No

Signed Statement

I hereby certify that I am an International Board Certified Lactation Consultant (IBCLC) in good standing and I accept responsibility for providing clinical instruction and direct supervision for the above named Pathway 3 Plan applicant.

Mentor’s Printed Name ________________________________

Mentor’s Signature __________________________ Date ________________

Please return this completed form to the Pathway 3 Plan applicant.

Applicant, please retain the completed form for your records and to fulfil audit requirements.
Report of Pathway 3 Clinical Practice Hours
*Please retain for your records and for fulfilling audit requirements.*

Please keep careful records. When applying for the IBLCE exam, your application may be randomly chosen for audit. *If your exam application is audited, you will be required to submit this document, along with other records.* Applicants who fail to comply with the terms of the audit will not be allowed to take the exam and will forfeit a non-refundable portion of the exam fee.

Pathway 3 Applicant’s Name___________________________

IBCLC ID__________________________________________

Chief Mentor’s Name_______________________________

A minimum of 500 directly supervised clinical practice hours must be documented on this report. Your mentors must verify completion of the clinical practice hours they directly supervised. Please complete the table below and then obtain your mentor’s signature and date in the appropriate box.

<table>
<thead>
<tr>
<th>Mentor’s Name</th>
<th>Number of Directly Supervised Clinical Practice Hours</th>
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Grand Total of Directly Supervised Clinical Practice Hours _________________________
**Pathway 3 Time Sheet**

Make as many copies of this sheet as you need. Use the sheet to record your directly supervised lactation specific clinical practice hours. These records will be used to complete the Report of Pathway 3 Clinical Practice Hours. Retain the time sheets for your records; IBLCE may request that you submit them as verification of the hours you reported.

Pathway 3 Applicant’s Name ___________________________ IBCLC ID __________

Chief Mentor’s Name ____________________________

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<thead>
<tr>
<th>Date</th>
<th>Brief Description of Daily Clinical Practice</th>
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Application for CERPs Award to Pathway 3 Mentors

SECTION 1: Chief Mentor Identification Details:

IBCLC ID: __________________________

Chief Mentor First and Last Name: _____________________________________________

Phone Number: __________________ Email Address (required): ____________________

First and Last Name of Pathway 3 mentee: _______________________________________
Mentee IBCLC ID#: ________________

SECTION 2: MENTOR RECORD: Please provide the requested information for each mentor.

<table>
<thead>
<tr>
<th>Name of Mentors</th>
<th>IBLCE ID Number</th>
<th>% of time spent mentoring</th>
<th>L-CERPs Awarded For office use only</th>
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IBLCE will review and award CERPs on the basis of the information provided. The number of CERPs awarded will be entered and a scanned copy of the completed form will be emailed to the Chief Mentor. It is the Chief Mentor’s responsibility to distribute copies of the CERPs award notification to all other mentors listed on the form. This copy of the form with the number of CERPs awarded will serve as the certificate of completion and may be used to document CERPs reported for recertification purposes.

SECTION 3: TERMS & CONDITIONS:

Please read the following statements and then sign and date the application form. Failure to sign and date the form will delay the review.

I understand that as the Chief Mentor, I am responsible for informing all mentors of the CERPs awarded; furthermore I agree that CERPs will only be awarded to mentors of verified Pathway 3 applicants or mentors. I verify that the information provided is truthful and can be confirmed by time logs of the mentors’ activities.

Signature: __________________________ Date: __________________________

Print Name

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Pathway 3 Plan Guide
Updated August 2018
**Pathway 3 Plan Verification Fee Schedule**

*Beginning September 1, 2018 through August 31, 2019*

| Tier 3 Countries | Afghanistan, Angola, Bangladesh, Benin, Bolivia, Burkina Faso, Burundi, Cambodia, Cameroon, Cape Verde, Central African Republic, Chad, Comoros, Cote D’Ivoire, Democratic Republic of the Congo, Djibouti, Eritrea, Ethiopia, Federated States of Micronesia, Gambia, Ghana, Guinea, Guinea-Bissau, Haiti, Honduras, Kenya, Kiribati, Kyrgyzstan, Lesotho, Liberia, Madagascar, Malawi, Mali, Marshall Islands, Mauritania, Moldova, Mozambique, Myanmar (Burma), Nepal, Nicaragua, Niger, Nigeria, North Korea, Pakistan, Papua New Guinea, Republic of the Congo, Rwanda, Samoa, Senegal, Sierra Leone, Solomon Islands, Somalia, South Sudan, Sudan, Syria, Tajikistan, Togo, Tonga, Tuvalu, Uganda, United Republic of Tanzania, Uzbekistan, Vanuatu, Viet Nam, Western Sahara, Yemen, Zambia, Zimbabwe |

| Tier 2 Countries | Albania, Algeria, American Samoa, Anguilla, Antigua and Barbuda, Argentina, Armenia, Azerbaijan, Barbados, Belarus, Belize, Bhutan, Bosnia and Herzegovina, Botswana, Brazil, Bulgaria, Chile, China, Colombia, Cook Islands, Costa Rica, Curacao, Dominica, Dominican Republic, Ecuador, Egypt, El Salvador, Equatorial Guinea, Fiji, French Polynesia, Gabon, Georgia, Grenada, Guatemala, Guyana, India, Indonesia, Iraq, Jamaica, Jordan, Kosovo, Laos, Lebanon, Libya, Macedonia, Maldives, Mauritius, Mexico, Mongolia, Montenegro, Montserrat, Morocco, Namibia, Northern Mariana Islands, Palau, Panama, Paraguay, Peru, Philippines, Serbia, South Africa, Sri Lanka, St. Lucia, St. Martin, St. Vincent and the Grenadines, Suriname, Swaziland, Thailand, Timor-Leste, Tunisia, Turkmenistan, Ukraine, Uruguay, Venezuela |

| Tier 1 Countries | Andorra, Aruba, Australia, Austria, Bahamas, Bahrain, Belgium, Bermuda, Brunei Darussalam, Canada, Cayman Islands, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Falkland Islands, Finland, France, Germany, Gibraltar, Greece, Greenland, Guadeloupe, Guam, Hong Kong, Hungary, Iceland, Ireland, Israel, Italy, Japan, Kazakhstan, Kuwait, Latvia, Liechtenstein, Lithuania, Luxembourg, Macau, Malaysia, Malta, Martinique, Monaco, Netherlands, New Caledonia, New Zealand, Norway, Oman, Poland, Portugal, Puerto Rico, Qatar, Reunion, Romania, Russian Federation, San Marino, Saudi Arabia, Seychelles, Singapore, Slovakia, Slovenia, South Korea, Spain, St. Kitts and Nevis, St. Maarten, Sweden, Switzerland, Taiwan, Trinidad and Tobago, Turkey, United Arab Emirates, United Kingdom, United States, Virgin Islands (British), Virgin Islands (US) |

<table>
<thead>
<tr>
<th>Pathway 3 Plan Verification Fee</th>
<th>USD Tier 1</th>
<th>USD Tier 2</th>
<th>USD Tier 3</th>
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<tbody>
<tr>
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*If your country is not listed, please contact IBLCE at iblce@iblce.org.*