



College of  
**TRADITIONAL  
CHINESE MEDICINE  
PRACTITIONERS +  
ACUPUNCTURISTS**  
of British Columbia

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## **ANSWERS TO QUESTIONS FROM THE 2021 ANNUAL GENERAL MEETING September 1, 2021**

**Question 1: When would students in BC who have not completed 2 years of post secondary education be eligible for the TCM Practitioners Examination?**

**Answer:** There are no current plans to change the requirements in place for application and registration. Currently, applicants in BC are required to meet both education requirements of TCM and acupuncture and two years liberal art/science studies for registration.

There has been Board discussion exploring an increased requirement for post-secondary education that might be fulfilled by the completion of a university degree in Traditional Chinese Medicine and Acupuncture. However, no decision has been made at this time.

**Question 2: Why are Committee members of the College not elected but appointed?**

**Answer:** The appointment of Committee members – both registrant members and public members - is governed by the Health Professions Act and the College Bylaws. Section 19(1)(u)(i) of the Health Professions Act states that Committee members must be appointed by the College's Board.

Committee appointments are made with consideration of an individual's expressed interest; whether, as a registrant, they are in good standing with the College; and whether they have the qualifications, skills, and experience required for a particular Committee. Appointments are made in consultation with the Chair of the Committee in question and consideration is given to minimizing potential conflicts of interest.

**Question 3: What is the Modernization of Health Regulation?**

**Answer:** The Minister of Health released a report on Recommendations to modernize the provincial health profession regulatory framework on August 27, 2020. The recommendations include competency-based board composition and size, overall efficiency including a reduction in the number of colleges, and oversight. Notably, the report recommends that the College amalgamate with the College of Chiropractors of BC, the College of Massage Therapists of BC, and the College of Naturopathic Physicians of BC to form a College of Complementary and Alternative Health Care Professionals of BC.

The modernization framework outlines responsibilities as follows:

- Government will control legislation, the ability to appoint all members to college boards and discipline panels, and decision-making regarding the regulation of health occupations.
  - The Health Professions Review Board, an independent body under the Ministry of Health, will review college registration decisions and review complaint decisions.
  - The Oversight Body, another independent body under the Ministry of Health, will monitor college performance, publish policy and practice guidance, focus on consistency between colleges, oversee
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college board appointments, and make recommendations concerning statutory regulation, as required.

- Independent Discipline Panels will conduct discipline hearings and make decisions regarding action to be taken.

**Question 4: Why does the College rely on CARB-TCMPA to provide for the registration examinations for R.Ac., R.TCM.H., and R.TCM.P?**

**Answer:** The ability to share resources and collaborate with regulators of TCM/A practitioners across Canada through CARB-TCMPA, in a collegial manner, has always been of value to the College and has allowed us to keep the cost of registration examinations low. The majority of the health professions in British Columbia also rely on a national alliance for their registration examinations, including physicians and surgeons, nurses, dentists, pharmacists, dietitians, chiropractors, physical therapists, occupational therapists, and more.

The Pan-Canadian Entry-Level Examinations in TCM and Acupuncture are high-stakes examinations required for registration to practice in BC and, as such, they support the College's mandate—assuring the public that practitioners from whom they seek care are knowledgeable and competent.

**Question 5: What is the College's position on registrants who are anti-vaccine?**

**Answer:** Registrants must adhere to the Code of Ethics and are responsible to the public to provide information that is fair, accurate and objective. Advertising and marketing of services and/or products must be compliant with section 92 of the College Bylaws.

As regulated health professionals in BC, we must adhere to the public health orders issued by the Ministry of Health and the Provincial Health Officer.

The expectations of professional and ethical conduct are the same whether registrants interact with clients in person or through social media or other online platforms. As such, registrants must not counsel a patient against obtaining immunizations or provide patients with 'anti-vaccination' materials in the absence of sound and properly documented medical rationale.

**Question 6: Is the College willing to regulate Point Injection Therapy?**

**Answer.** The College recognizes that the Health Professions Act of BC does not currently authorize registrants to perform injections including: intra-articular injection including synovial fluid replacement therapy/prolotherapy; mesotherapy/injection lipolysis; or intravenous therapy including intravenous injection, infusion; platelet rich plasma; or nerve blocks of any type. The CTCMA proposed several amendments to the Regulation in 2015, noting that the gap between the current scope of practice and the legal authorization for restricted activities under the Health Professions Act was an urgent matter with respect to protecting the public interest.

Until such an amendment is made by government, administering injectables is not within scope of practice for traditional Chinese medicine practitioners and acupuncturists in British Columbia. Additionally, the Pharmacy Operations and Drug Scheduling Act of BC prohibits registrants of the CTCMA from storing, administering, and selling schedule 2 substances. As such, the College must enforce the scope of practice set out by the Minister of Health under sections 1 and 4 of the Traditional Chinese Medicine Practitioners and Acupuncturists Regulation.

Recently, the public has brought the urgent need for enhanced pain management therapies - including various injection therapies - to the College's attention, and in turn, the College has brought the same concerns forward to Government. Government may elect to introduce a Bill in the legislature to amend the legislation. We have

assured them that we are prepared to support a certified practice registry for qualified registrants should they agree to move forward.

**Question 7: What is the College doing to address Indigenous-specific racism in health care?**

**Answer:** Last year's In Plain Sight report provided evidence of the widespread discrimination, racism and abuse that Indigenous peoples regularly experience when seeking healthcare services. The College collaborated with several other BC health regulatory colleges and have released a joint statement of apology.

In the joint statement, the College committed to:

- Develop and foster a speak-up culture within our organizations.
- Acknowledge who is and is not at the table when we make decisions.
- Increase Indigenous representation on boards, committees, and amongst staff.
- Offer regular training to staff on cultural safety and humility.
- Provide resources to registrants to improve ICSH in their practice.
- Improve data collection to track and support the increase of Indigenous health-care professionals and to measure our progress of contributing to safer health-care delivery.
- Review and/or implement policies inside our organizations to address Indigenous-specific racism.
- Report on the work and progress we are making in an accountable and transparent manner.

**Question 8: May I ask the Chairman what policies have been established by you and the former Chairman that will protect the public interest for years to come?**

**Answer:** The role of the Chairperson of the Board is to provide effective leadership to the Board and act as a liaison between the Board and management. It is not the role of the Board Chairperson to establish policies as it is the Board as a whole that has that authority.

The mandate of the College is to serve and protect the public interest by regulating traditional Chinese medicine and acupuncture in British Columbia. This means that the College:

- Ensures that only applicants who meet the Pan-Canadian Entry-Level Competencies Standards are granted registration to practice TCM and acupuncture,
- Ensures that registrants maintain their competence by participating in continuing education,
- Investigates and resolves complaints to ensure that the public is adequately protected.