



## Speech and Hearing BC

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[Via email: proregadmin@gov.bc.ca](mailto:proregadmin@gov.bc.ca)

### **Speech and Hearing BC Submission to the Steering Committee: Consultation on the Modernization of the Health Regulation Framework**

Speech and Hearing BC has engaged its members regarding the modernization of the health regulation framework in BC. We are grateful for the opportunity to participate in this consultation process. Speech and Hearing BC members seek assurance that their unique interests will be represented and considered. Our members are committed to high practice standards and to ensuring public confidence in our professions and in the college that registers them. We support regulatory change and we hope the Steering Committee will consider the following points.

#### **Maintaining Distinct Professional Representation in a Large Multi-Profession College:**

Speech-Language Pathologists and Audiologists are a small, unique group of professionals serving diverse populations across the lifespan in settings including hospitals, health units, child development centres, provincial assessment and outreach centres, first nations health authorities, first nations schools, BC schools, private practices, non-profit societies and research institutions. Consideration of grouping professionals who share similarly varied work settings is important to our members.

Our members are seeking reassurance that an understanding of our professions is not lost or muted within a 16-profession college. We recognize the added challenge in regulating 16 professions but maintaining an understanding of the particular aspects of our disciplines will be essential.

#### **Reducing Financial Burden / Policies Affecting Access to Service:**

Speech-Language Pathologists and Audiologists are committed to high practice standards and a code of ethics that predates college regulation. We support elevating the public interest and patient safety above professional interest. We urge regulatory colleges to consider access to service concerns when fee setting and how it may impact the health of rural and remote areas. One example of this occurred recently when the current college announced a 50% registration fee increase. Our association heard from a member living in NWT who registers in BC to serve a remote northern community. This clinician reported to us that she is terminating her BC college registration citing the fee increase as the reason. As a result, the Northern community she serves will no longer have access to speech language pathology services.

Related to policies that affect access to service concerns setting advanced competencies. It seems the criteria reflects education and support more easily accessible to a clinician in an urban setting vs a rural setting. If a rural clinician is unable to access the education or mentorship an advanced competency certificate requires, it could create barriers to services available in rural areas of British Columbia.

## Composition of the College:

Speech-Language Pathologists and Audiologists are concerned that the Public will have less confidence in their evidence-based, lower-risk services when combined with professions that may have higher risk profile (e.g., chiropractors, massage therapist, acupuncturists). We do not object to reducing the number of colleges in BC. Members ask if the Steering Committee has considered an additional separation within the proposed 16-profession College?

Allied health professionals often train in interdisciplinary teams at university and are connected through their professions' use of evidence based practice and often, working environments. We support the consideration of separating the College of Health and Carers of BC into a college of allied health disciplines (e.g. SLPs, Audiologists, PTs, OTs, Dietitians, Social Workers, Psychologists, Respiratory Therapists). Such a college could better reflect the health professionals working in acute care and health rehabilitation, in schools and the community given the diversity of professional practice, work setting and dedicated ministry oversight. We seek to understand how the 5<sup>th</sup> college was proposed, what the Ministry of Health believes are the benefits and risks of having 16 professions in one college when there is, to us, a clear further division of professional roles.

## Registration Fees:

Our members were quite evenly split on the belief that fees will decrease due to regulatory efficiencies or conversely that they will increase due to higher costs of oversight and being in a college with higher-risk professional practices. There is an overwhelming positive response to the focus on efficiencies and transparency on regulatory matters. Members are seeking clarification on the impact of a larger college and whether there is a formula for fees in place and if the setting of fees will be a transparent process. There are themes that emerged from the feedback related to fees and accountability of spending:

- This first theme is *Evaluation of Professions' Number of Complaints*. Will colleges under the current system that have fewer or lower-risk complaints bear the cost of the others under the new, larger colleges?
- The second theme that arose relates to *Fiduciary Responsibility*: The current regulatory body has announced a 50% increase in registration fees, with many members finding unsatisfactory response from the college to inquiries of accountability and transparency over the large fee increase. Our members have largely indicated that they do not protest an increase and recognize the growing costs of regulation and protecting the public but seek to understand why such a large increase is necessary in such a short period of time. We fully understand and support that the role of the college is to protect the public, but we ask if it is reasonable that the registrants have a means to assess accountability for how the fees are spent? Will the new college have a process in place for registrants to seek information and accountability on college spending?
- Finally, the third theme was *Transfer of Cost* in the new format of regulation. Currently, the Province of BC will cover the cost of the oversight body which will then be transferred to the colleges in future. Is there an estimate of this timeframe?

## Working Relationship between Association and College:

From a professional association perspective, we seek to protect the public by ensuring that our members are up to date on evidence based practice and also cultural sensitivity within their practice.

Speech and Hearing BC hosts an annual conference that includes a full agenda on services within indigenous health care settings and the populations related to all settings in which our members serve. We also provide public education on the roles and scope of practice that our members perform. We believe this helps to protect the public from receiving services from those who are not regulated to our high standards.

As an association, we respectfully ask if we can seek clarification on the relationship that can exist between a regulatory college and a professional association. Would there not be mutual benefit to the public if a regulatory body and an association have some form of relationship? While we understand that there needs to be clear lines of distinction to protect the public, we hope that there can be a respectful and supportive relationship between the college and professional associations.

Speech and Hearing BC is grateful for the opportunity to provide feedback to the Steering Committee regarding the future of professional regulation in BC. We hope that our submission assists you in your efforts to modernize the health regulation framework in BC. Should you need clarification on any of the above, please feel free to contact me.

A handwritten signature in black ink that reads "Staci Cooper RSLP". The signature is written in a cursive, flowing style.

Staci Cooper, M.SLP, R.SLP (C)  
Registered Speech Language Pathologist  
President Speech and Hearing BC