

The College of Paramedics of Nova Scotia

March 27, 2023

Law Amendments Committee
Nova Scotia Legislature
Province House
1726 Hollis Street
Halifax, Nova Scotia, B3J 2Y3

Dear Members of the Law Amendments Committee:

RE: College of Paramedics of Nova Scotia Submission RE Bill 265 – Patient Access to Care Act

I am the Executive Director and Registrar for the College of Paramedics of Nova Scotia. I have been in this position since the inception of the College and a paramedic in Nova Scotia since 1992.

First, we would like to thank the Law Amendments Committee through the Chair, the Honourable Brad Johns, for providing the opportunity to speak on behalf of the College of Paramedics of Nova Scotia regarding Bill 256.

1. The College of Paramedics of Nova Scotia is the professional regulator of the paramedic profession in Nova Scotia. The College is established pursuant to the *Paramedics Act*, which was proclaimed on April 1, 2017. Pursuant to the *Paramedics Act*, the College is statutorily mandated to serve and protect the public interest in the practice of paramedicine. It is from this public interest lens that the College offers its comments regarding Bill 256.
1. In principle, the College of Paramedics of Nova Scotia supports Bill 256 *The Patient Access to Care Act's* purpose. However, we agree with the Nova Scotia Regulated Health Professions Network's (the Network's) position that the proposed legislation could benefit from some amendments, increased clarity, and revised definitions to better reflect the terms used in existing regulatory statutes.
2. Within this submission, the College intends to express its concerns related to the legislative process of Bill 256 as well as some of the consequences regarding provisions of the Bill as they relate to the registration and licensure of applicants from other jurisdictions.
3. First, let me address the concern about the legislative process and our College's experience with seeking amendments to the *Paramedics Act and Regulations*.
4. Recognizing it is redundant to say; the Governments Self-regulated Professions Policy has a stated objective to ensure that the Treasury and Policy Board receives complete, accurate and relevant information upon which to make decisions respecting self-regulated professions and to improve the quality and consistency of submissions requesting new and amended legislation.
5. To receive complete, accurate and relevant information upon which to make decisions regarding Bill 256 consultations should have occurred with key stakeholders, including professional associations, unions, health care associations, regulatory bodies and the public.

6. Having been founded on April 1, 2017, the College of Paramedics of Nova Scotia is still relatively young. However, within our first six months of operation, we identified several aspects of our legislation that impacted our ability to operate effectively and efficiently.
7. To address the significant concerns identified, we approached the Government about taking the necessary steps to amend our legislation; through consultations with the Government we identified over 50 stakeholder groups to consult with. AND WE DID SO!
8. While we recognize Bill 256 does not request the formation of a new self-regulated profession or amend a specific regulators current legislation, the Bill is worthy of consultation because it impacts components of the healthcare professions' regulatory responsibilities. (Registration and Licensure, Scope of Practice).
9. However, it is our understanding that there was minimal if no consultation regarding Bill 256. This approach could be seen to create an erosion of trust between the Government and the regulated health professions.
10. Due to the speed at which Bill 256 is moving through the legislature, the College of Paramedics staff could not engage its Council in discussions regarding the language within the Bill. The Government missed an opportunity to receive feedback from regulated registrants and its own Government appointed public representatives on the Council.
11. When Government grants a profession the privilege to self-regulate, it establishes a regulatory framework and provides the authority needed to develop, implement, and enforce rules to protect the public and ensure registrants provide services competently and ethically.
12. The Governments stated primary purpose for permitting self-regulation is to address the risks of harm in the provision of healthcare services and to serve the public interest.
 - 12.1. Self-regulation is granted to professions when there are real and substantial risks of harm to clients/patients. Due to the specialized nature of the professions, self-regulation is the most efficient and effective means of addressing such risks.
13. We interpret this to mean that the Nova Scotia Government recognizes that the profession knows itself best and is in the best position to regulate in the public interest.
14. I am here today representing the College of Paramedics of Nova Scotia to serve and protect the public interest in the practice of paramedicine by addressing some of the wording within Bill 256.
15. With the limited amount of time for speaking today, I will address only the aspect of the legislation as it pertains to registration and licensure process.
16. Our College can and does register and license a first-time applicant within 2 to 5 business days after the applicant has submitted all the requested documentation and information.
17. The College has a straightforward online application process, where it connects its electronic application to all of the Colleges registration and licensing policies.

18. That stated, the College carefully screens and assesses each applicant it receives to ensure the applicant possesses the competence, character, and capacity to safely and practise paramedicine in Nova Scotia. This is one of the primary ways in which the College safeguards the interests of Nova Scotia Scotians. Since its inception, the College has denied several applicants registration and licensure because of public safety concerns that surfaced during the application process.
19. We cannot over emphasize the risks posed to the public if paramedic applicants are not screened effectively against the criteria for registration and licensure.
20. Every day in Nova Scotia, paramedics are called upon to work in very unstructured environments with access to the province's most vulnerable populations.
21. Just before the College's inception, a paramedic was charged and convicted of sexually assaulting a vulnerable senior citizen, while in uniform and on duty.
22. Before this, there were two other well-known cases. One paramedic was convicted of possessing child pornography, while the other attempted to lure a minor.
23. The requirement of good character is indispensable to the professions ability to self-regulate. Paramedics, as regulated health care professionals, have a special relationship with members of the public, rooted in mutual trust, confidence, and respect which is critical to effective practice.
24. Good character connotes moral strength and includes trustworthiness, integrity, honesty, reliability, governability, candour, empathy, and honesty, amongst many other indications of good character. The purposes of the good-character requirement include protecting the public, maintaining high ethical standards, and maintaining public confidence in the paramedic profession.
25. Integrity, honesty, and governability are fundamental qualities of any individual who seeks to practise as a member of the paramedicine profession. If a patient doubts a paramedics trustworthiness, an essential element in a patient-paramedic relationship will be missing. Regardless of how competent the paramedic may be, if personal integrity, honesty, or governability is lacking, the paramedic's usefulness to the patient and reputation within the profession, may be destroyed.
26. The College continually identifies and effectively manages applicants of concern. These applicants include those terminated by their employer, with recent regulatory professional conduct histories, recent weapons charges, theft over \$5000, and assaults, including sexual assaults.
27. Since the inception of the College almost 6-years ago, there have been no fewer than 16 out of approximately 600 individuals (approx. 3%) denied registration and licensure with the College, had voluntarily withdrawn their applications because of concerns that were identified, or had a registration decision placed on their file that followed them into the College should any professional conduct issues arise.
28. These actions during the registration and licensing processes protect the public.
29. However, the language currently proposed in Bill 256 will impact our ability to screen applicants for:

- 29.1. Criminal convictions.
 - 29.2. Good character.
 - 29.3. Incapacity.
 - 29.4. Incompetence.
 - 29.5. Possession of professional liability insurance.
 - 29.6. Language proficiency.
30. An inability to screen applicants for these matters will inadvertently and unnecessarily place the public at risk.
31. It is for these reasons and the others described in the Joint Submission to the Department of Health and Wellness, Bill 256 – Patient Access to Care Act, submitted by Marjorie Hickey, Ryan Baxter and Raylene Langor, on behalf of the Nova Scotia Regulated Health Professions Network dated March 26, 2023, that the College of Paramedics of Nova Scotia supports the position described by the Network.

Again, we thank the Law Amendments Committee through the Chair, the Honourable Brad Johns, for providing the time to speak on behalf of the College of Paramedics of Nova Scotia regarding Bill 256.

Sincerely,



Karl Kowalczyk ACP BBA
Executive Director/Registrar

Enclosure(s): Joint Submission to the Department of Health and Wellness, Bill 256 – Patient Access to Care Act, submitted by Marjorie Hickey, Ryan Baxter, and Raylene Langor, on behalf of the Nova Scotia Regulated Health Professions Network dated March 26, 2023.