



Nova Scotia College of Chiropractors

Submission to the Law Amendments Committee – Review of Bill 256

March 24, 2023

The College of Chiropractors of Nova Scotia holds public safety in health care as its primary focus and mandate. Ensuring well educated, competent practitioners that provide health care services within their scope of practice is a core priority for the Nova Scotia College of Chiropractors. The reality of a lack of health care services and providers in our growing population is a vital focus for the Government of Nova Scotia and can not be ignored. As partners in providing safe, effective and appropriate health care to all Nova Scotians, we must find the way to meet both of those key mandates, together.

Bill 256, cited as the Patient Access to Care Act, proposed on March 21 is an opportunity for government and regulators to work together to improve access to health care in Nova Scotia. The College of Chiropractors of Nova Scotia was one of the first signatories of the Agreement on Internal Trade over a decade ago to facilitate movement of licensed professionals in good standing across Canadian jurisdictions. The chiropractic profession has an international educational accrediting body (Council on Chiropractic Education International) that looks to enhance portability of trained, competent chiropractors throughout Canada and the world. We continue to support these efforts to enhance mobility of competent practitioners in our country and internationally.

The College of Chiropractors of Nova Scotia advocates for the safe and effective delivery of health services within each profession's fullest scope of practice and competency. The chiropractic profession has recently advocated for access to prescribe radiology studies in hospitals in NS to improve wait times and services for Nova Scotians who require x-ray. These services are already within the chiropractic scope of practice and competency profile. We can help shorten wait times and allow for earlier diagnosis for Nova Scotians to improve overall health services delivery.

In addition, the chiropractic profession recently submitted a brief to the Superintendent of Insurance outlining ways in which the profession can contribute to patient care and reduce the burden of redundant paperwork on our medical colleagues. We applaud the changes in language to allow all health care providers to provide work related documentation within their scope of practice. Working together, patients win.

The College of Chiropractors is tasked with ensuring chiropractic practitioners in Nova Scotia are practicing with competency within their scope of practice. To achieve that aim at our highest level, clarity is critical. Our registrants require clear direction on requirements for competencies as well as clear delineation of the scope of practice they must follow. As regulators, we must be capable of assessing and monitoring these competencies in order to enforce the public protection role. To that end, there are sections of the proposed Bill 256 which are open to different interpretations around scope of practice for individual practitioners. In further revisions or subsequent regulations, we request that these are clear and defined for the public, for practitioners and for regulators.

Specifically, we request clarity of Section 3, definitions:

““expanded scope of practice area” means an area of practice for a particular regulated health profession that is not provided for in the enactment listed in the definition of “regulated health profession” for that profession but that is within a practitioner’s professional competence”

One might read this to interpret that expanded areas of practice apply to the profession as part of the training and assessment of practitioners within the profession. Alternatively, it might be interpreted to allow a particular registrant with some additional or former education to have an individual scope that expands beyond the profession. In the second case, regulation of that activity would be challenging in both credentialing and in monitoring for competency.

Perhaps an alternative to better reflect the first interpretation could read something like:

“expanded scope of practice area” means an area of practice for a particular regulated health profession that is not provided for in the enactment listed in its definition but is within the professional competence of registrants of that profession”

Further to the interest of clarity, the term “good standing” could be defined more specifically in section 5(2):

“(2) An authority shall waive any requirement for registration, licensing or renewal of registration or licensing for any applicant who is registered or licensed and who is in good standing in any jurisdiction prescribed by the regulations.”

Previous work in enhancing labour mobility for chiropractors has shown this to be inconsistently applied in other jurisdiction and in some areas not used in regular terminology. Defining the applicant more specifically to note they are practicing under an unrestricted license without censure and without ongoing complaint or criminal investigation or finding would be more consistent with our goal of public protection.

The College of Chiropractors of Nova Scotia will make all necessary changes to enhance mobility for applicants in a timely manner and ensure that due diligence continues to protect the public from those who cannot demonstrate appropriate competency. Improving health care in Nova Scotia can not be attained unless our workforce is competent, safe and able to achieve registration with appropriate application requirements administered as promptly as possible.

The College of Chiropractors looks forward to working with the Governor in Council to establish regulations that allow chiropractors to continue to provide safe and competent services to Nova Scotians with expansion of scope to serve Nova Scotians to our full level of training and competency in examination, diagnosis, and patient care management. There are opportunities for responsible regulators and responsible government to create incredible opportunities to reimagine health care and provide optimal services for Nova Scotians.

Thank you for the opportunity to comment on Bill 256. Providing excellent and competent health care and health care providers to Nova Scotians must be the focus for us all as we find solutions together.