

October 15, 2023

Mr. Gordon Hebb, Chief Legislative Counsel  
Legislative Counsel Office  
1809 Barrington Street  
Halifax, Nova Scotia

BY EMAIL: [legc.office@novascotia.ca](mailto:legc.office@novascotia.ca)

Dear Mr. Hebb:

**Re: Bill No. 323 – Regulated Health Professions Act**

The profession of Chiropractic has been a self-regulatory profession in Nova Scotia since 1972. The Nova Scotia College of Chiropractors was established by The Chiropractic Act in 1999 with the express purpose of regulating the profession in the public interest. We take very seriously the honor and responsibility of self-regulation.

Over these 50 plus years, the Nova Scotia College of Chiropractors has diligently represented the public interest in establishing registration requirements, standards of practice, code of ethics, continued education standards and a robust quality assurance program that includes one of the first peer assessment processes for health care regulation in Nova Scotia. The College has successfully defended the people of Nova Scotia from the potential harm of an individual attempting to practice without registration or licensure. The College has maintained high standards of professional integrity and conduct in investigating complaints and disciplining registrants as necessary to ensure patients and the public can maintain a high level of trust in the services and expertise of Nova Scotia's chiropractic profession.

The Nova Scotia College of Chiropractors would like to formally note that the short legislative time frame for Bill 323 (Regulated Health Professions Act) prohibits our lawyers, administration, and Board from a fulsome review of the proposed legislation at the Law Amendments Committee discussions today. With less than one business day to review, research and respond to the 241 clauses of the proposed Act, we will only comment in broad terms for consideration.

The Nova Scotia College of Chiropractors supports the concept of common legislation applicable to all regulated health professions. This is not a new concept and has been effectively applied in Ontario, for example, for over 25 years. More recently adopted in Alberta, the transition of individual self-regulatory boards within a common framework has also been successful. Common processes of registration and appeal, complaints and discipline, fitness-to-

practice parameters and quality assurance programs will allow all the regulated health professions better opportunities for utilizing current best practices, sharing learning opportunities and an improved clarity in communicating key elements of regulation to the public.

The Nova Scotia College of Chiropractors would like to note its concern that there is much of key importance left to regulations and not noted in the Act, particularly as it related to operational components critical to self-regulation. There is reference to continued operation of regulatory bodies as well as reference to amalgamation of regulatory bodies and to the establishment of multidisciplinary regulators. If a common foundation in regulation of all health professions is the goal, the potential for different professions to have different structures seems inconsistent.

The Nova Scotia College of Chiropractors would like to draw the attention of the government and legislature to the strong track record of the College in enforcing high standards of care and conduct in protecting Nova Scotians for over 50 years. In addition, the Nova Scotia College of Chiropractors has the financial and administrative resources, as well as a highly functioning Board of Directors which includes two public members, already in place to continue its work in the public interest. We look forward to implementing the new framework which enhances our current operations at the Nova Scotia College of Chiropractors as a self-regulated profession.

Sincerely



Dr. Michelle MacDonald  
Chair of the Board, Nova Scotia College of Chiropractors

Any further questions or requests for information can be forwarded to:

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