

HPOA: Summary and Analysis of the Draft CPSBC Bylaws Under Group Four

This document provides an overview of Doctors of BC's analysis of the draft CPSBC bylaws under the *Health Professions and Occupations Act* (HPOA) released for consultation under group four and identifies potential areas of concern for members. This includes:

- Updates to **Delegation** authorities related to delegated aspects of practice and restricted activities
- New **Support Programs** that provide information and support services to complainants

Regulatory colleges, such as CPSBC, are required to review and update their bylaws to reflect the provisions of the HPOA. This document highlights Doctors of BC's concerns related to the HPOA, as reflected in CPSBC's draft bylaws, as well as concerns related to CPSBC's interpretation of the HPOA. These concerns are distinct and described in our analysis as appropriate.

This document will be updated based on our ongoing review and analysis of CPSBC draft bylaws and as new information becomes available.

Summary of Changes	Areas of Concern
Delegation <ul style="list-style-type: none"> • The draft bylaws provide delegation authority for select regulated and unregulated health professionals who work in accredited facilities: <ul style="list-style-type: none"> ○ Physician assistants ○ Medical radiation technologists ○ Sonographers ○ Medical laboratory technologists ○ Medical laboratory assistants ○ Respiratory therapists ○ Registered polysomnographic technologists ○ Electromyography technologists ○ Combined X-ray and laboratory technologists ○ Reproductive technology technician ○ Ophthalmologic laser technician ○ Hair Transplant Technician • A licensee remains responsible for any aspect of practice or restricted activity that they delegate to another practitioner. 	<ul style="list-style-type: none"> • Delegation activities have been developed without meaningful physician input. As a result, there may be activities that are not captured in the bylaws that could prevent physicians from delegating these tasks. As well, some of the tasks that are included may not be appropriate to be delegated to that practitioner. • Unregulated practitioners may not have sufficient liability protection. Given that a licensee remains responsible for any aspect of practice that is delegated, there may be medico-legal risks associated with delegation.
Support Programs <ul style="list-style-type: none"> • The HPOA requires regulatory colleges to provide information services to complainants, fund support workers and support services (counselling) for patients who have been harmed by a licensee. 	<ul style="list-style-type: none"> • Physicians have not been provided the opportunity to shape the design and implementation of support programs.