

Enlighten

News from the CNPBC



October 2022

Blanketing Ceremony Marks New Practice Standard

On the morning of September 30, 2022, National Day for Truth and Reconciliation, a Blanketing Ceremony was held to mark the collective work and adoption of the Indigenous Cultural Safety, Humility, and Anti- Racism Practice Standard.

Representatives from eleven regulatory colleges assembled at Vancouver Maritime Museum, located on the unceded territories of the $x^w m \theta k w \acute{y} \acute{a} m$ (Musqueam), $s \acute{k} w \acute{x} w \acute{u} 7 m e s h$ (Squamish), and $s \acute{e} l i l w \acute{e} t \acute{a} \acute{t}$ (Tsleil-Waututh) Nations. CNPBC's Deputy Registrar, Lee Dorner, attended on behalf of the College. This moving ceremony was led by guides Sulksun (Shane Pointe), proud member of the Coast Salish Nation and the Musqueam Indian Band, and Knowledge Keeper to all, and Joe Gallagher ($k'wun \acute{e} m \acute{e} n$) of the Tla'amin Nation.

The Practice Standard supports each individual college's goals to eliminate Indigenous-specific racism and sets expectations of health professionals to eliminate it and provide culturally safe and appropriate care to BC's First Nations, Métis, and Inuit peoples.

We gratefully acknowledge Sulksun (Shane Pointe), proud member of the Coast Salish Nation and the Musqueam Indian Band, and Knowledge Keeper to all, and Joe Gallagher ($k'wun \acute{e} m \acute{e} n$) of the Tla'amin Nation, Principal at Qoqoq Consulting Ltd., for their guidance in this work. We also appreciate the work of the BC College of Nurses and Midwives and the College of Physicians and Surgeons of BC for their extensive efforts to not only develop and implement their Indigenous Cultural Safety, Humility, and Anti-racism Practice Standard but also for granting permission for its use by other health profession regulators.



Joe Gallagher (k'wunəmen) of Tla'amin Nation, Principal at Qoqoq Consulting Ltd., opening the ceremony and providing background information to attendees



Blanketed attendees listening to Knowledge Keeper regarding the significance of the ochre placed on the ground before them. Our Deputy Registrar, Lee Dorner, is second from the right.

CNPBC Fee Increase

The College today advises registrants of the Board's decision to apply a 10% fee increase for the registration year beginning January 1, 2023.

This increase, together with the prior year's, provides a stable source of income for the College to fund its increasingly complex operational activities, to be able to respond to the uncertainties inherent in the regulatory world, and to manage increasing costs from inflationary pressures. As a not-for-profit organization, our goal is to set fees on a cost-recovery basis.

The CNPBC registration year runs from January 1st to December 31st. The registration renewal period will begin in November, and the increase will be payable at that time. In order to ensure your continuous registration, you are required to renew your registration every year.

The 10% fee level increases have been filed with the Ministry of Health, as follows:

SCHEDULE "C"

Registrant Fees

1.	Examination Fees		Bylaws
	CNPBC Jurisprudence Examination	\$116	s. 46(1)(d)(ii)
	CNPBC Oral/Practical Examination	\$231	s. 46(1)(d)(ii)

2.	Application Fees		Bylaws
	Full registration	\$289	s. 46(1)(d)(ii)
	Non-practicing registration	\$289	s. 48(1)(b)
	Temporary registration	\$289	s. 50(1)(d)(ii)

3.	Reinstatement Fees		Bylaws
	Registration reinstatement	\$289	s. 58(2)(c)(ii)
	Reinstatement following non-payment of fees ¹	\$10/day to a maximum of \$250	s. 60(1)(b)(vi)

4.	Registration Fees & Registration Renewal Fees	Annual	Bylaws, s. 56(1)(b)
	Full registration	\$2,090	s. 46(1)(d)(ii)
	Non-practicing registration	\$2,090	s. 48(1)(b)
	Temporary registration	\$2,090	s. 50(1)(d)(ii)
	Registration renewal following non-payment of fees ²	\$2,090	s. 60(1)(b)(ii)

5.	Certification Fees	Initial Application s. 53(2)(b)	Renewal (Annual)** s. 56(2)
	Acupuncture	\$88	\$88
	Immunization	0	0
	Prescriptive Authority	\$116	\$116
	Hyperbaric Oxygen Therapy	\$116	\$116
	Intrauterine Device (IUD) Insertion	\$116	\$116
	Advanced Injection Therapy - Part A (formerly Prolotherapy)	\$180	\$180
	Advanced Injection Therapy - Part B (includes medical PRP)	\$180	\$180
	Botulinum toxin: medical/non-aesthetic	\$235	\$235
	IV Therapies	\$116	\$116
	IV & Chelation	\$180	\$180
	Ozone Therapy	\$180	\$180
	Aesthetic Procedure - Cosmetic Botulinum Toxin	\$235	\$235
	Aesthetic Procedure - Injectable Fillers	\$235	\$235
	Aesthetic Procedure - Facial mesotherapy, fat reduction, and body contouring using injection or other devices	\$235	\$235
	Aesthetic Procedure - Microdermabrasion and chemical peels	\$235	\$235

	Aesthetic Procedure - Photorejuvenation and high frequency electromagnetic treatments	\$235	\$235
	Aesthetic Procedure - PRP Injections to the face or other skin areas for aesthetic purposes	\$235	\$235

** Certification Restoration Fee, s. 60(3)

6.	Health Profession Corporation Permit Fees	Permit Application s. 91(1)(c) ³	Permit Renewal (Annual) s. 93(1)(b) ⁴
	Permit Fee & Permit Renewal Fee	\$289	\$289

1. Only applies if application for reinstatement is made not later than three (3) months following the cancellation of registration.

2. See note 1.

3. A permit is valid from the issue date shown until not later than the following December 31st. Bylaws, s. 92(2).

4. A renewal permit is valid until not later than the following December 32st. Bylaws, s. 93(2).

Certification Requirements for Injectable Fillers - Grandfathering

In 2022, following input from the Quality Assurance Committee, the Certification Grandfathering Requirements for Injectable Fillers were developed to meet what the Committee and the College believed was needed for best practice and protection of the public. The grandfathering process is for those who were granted Certification in Injectable Fillers *prior* to the introduction of the new certification process on September 1st, 2022. Grandfathering, in this context, is the process of assessing an individual's education and experience for the purpose of exempting them from requirements they have already met.

As a result of consultation with both registrants and the Committee, the College has updated the certification requirements to recognize the current post-pandemic environment and to ensure public safety.

The College would like to thank everyone for their valuable input. We have listened to the concerns and recognized the difficulty these circumstances presented for registrants seeking to meet the requirements for Certification in Injectable Fillers.

The updated Grandfathering Requirements will be posted to the College website, and are summarized here and in the table below:

- **All those certified in Aesthetics Injectable Fillers prior to September 1st, 2022, will be automatically granted certification in Aesthetics Injectable Fillers - Level 1.**
- **Only those wishing to pursue Level 2 will be required to submit 100 records in the Level 2 areas from the last 24 months. Applicants can find the required forms [here](#).**

Requirement*	Level 1	Provisional Level 2	Level 2
Certification in Aesthetics Injectable Filler prior to September 1 st , 2022.	✓	✓	✓
Greater than 2-year experience with injectable fillers.		✓	✓
Level 2 Injectable Filler certification course completed - theory and practical hands-on glabella, forehead, nose (bridge, tip and nasolabial junction), pyriform, nasal folds (with needle), tear troughs, eyelids, temples, body.		✓	✓
2 years of clinical practice with all types of injectable fillers in level 2 areas (glabella, forehead, nose (bridge, tip and nasolabial junction), pyriform, nasal folds (with needle), tear troughs, eyelids, temples, body).			✓
100 treatments in the areas of level 2 in the last 24 months .			✓

A Reminder from Health Canada on Advertising

As a reminder, the following information is being provided to all registrants. Health Canada does not permit advertising of compounded substances, specifically compounded IV treatments, to the public:

- in 'menu-like' formats;
- for the treatment of common ailments such as low energy, low mood, weight control, and the aftereffects of drugs or alcohol; and/or
- with claims regarding the efficacy of substances, such as vitamins, as treatments for ailments not listed in the monographs for those substances.

Such advertising violates sections 9 and 3 of the [Food and Drugs Act](#) and Health Canada's [Policy on Manufacturing and Compounding Drug Products in Canada](#).

The College would like to remind all registrants of the following sections of the [Food and Drugs Act](#):

9 (1) No person shall label, package, treat, process, sell or advertise any drug in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit or safety.

3 (1) No person shall advertise any food, drug, cosmetic or device to the general public as a treatment, preventative or cure for any of the diseases, disorders or abnormal physical states referred to [Schedule A.1](#).

Compounding and Advertising

It is Health Canada's position that a compounded product or a compounding service may not be advertised to the general public, see [Appendix I General Guideline on Compounding and Manufacturing Activities](#).

In order to provide a compounded product, registrants must ensure that:

- a valid patient-healthcare professional relationship exists;
- a compounded product is compounded for an individual person;
- there is a therapeutic need for the product or lack of product availability; and

- compounding takes place only in the case of **therapeutic need** or lack of product availability, and not solely for the economic benefit of the healthcare professional.

For more information, registrants should read section 5.1 of Health Canada's [Policy on Manufacturing and Compounding Drug Products in Canada](#).

Advertising Vitamin IVs and Injectable Vitamins

Some vitamin mineral preparations are considered a Natural Health Product (NHP) under the [Natural Health Products Regulations](#) (NHPR). However, when administered by injection or IV, these products are excluded from the NHPR and subject to the Food and Drug Regulations as they are considered to be a compounded drug. The following are examples, from [Schedule A.1](#), of conditions that a health product (drug or NHP) may **not be advertised** to treat:

- Acute alcoholism
- Acute anxiety state
- Acute infectious respiratory syndromes
- Acute psychotic conditions
- Addiction (except nicotine addiction)
- Asthma
- Cancer
- Dementia
- Depression
- Obesity
- Thyroid disease

The full list may be found in [Schedule A.1](#) of the **Food and Drugs Act**. In order to advertise a health product as preventative for the conditions listed in [Schedule A.1](#), a product must have market authorization (i.e., a Drug Identification Number or Natural Product Number) issued by Health Canada. Compounded products do not have market authorization and cannot be advertised.

Examples of Advertising Contraventions

Below are some examples of advertising that violates the *Food and Drugs Act* and the *Food and Drugs Regulation*. This list is not exhaustive:

- Offering a “menu” of products that suggest members of the public may order a pre-formulated product such as a vitamin IV drip or injectable vitamin.
- Advertising IV drips or vitamin injections to treat specific conditions such as anxiety, stress, respiratory or lung infections, or mood disorders.
- Advertising products such as vitamins for misleading and/or off-label purposes, such as improving beauty, confidence, immunity, or energy.

As a naturopathic doctor in British Columbia, you are expected to comply with federal, provincial, territorial, and municipal laws, rules, and regulations. A failure to do so may be considered professional misconduct pursuant to section 3(l) of the [Code of Conduct](#).

Pharmanet Access Through PRIME

This is a reminder that the deadline for registrants to sign up for Pharmanet Access through PRIME is December 31, 2022.

Access to Pharmanet will be a condition to gaining or renewing certification in Prescriptive Authority. Any registrant who has not already done so is strongly encouraged to begin the process of signing up as soon as possible in order to ensure that their access request is processed by PRIME in time to meet the December 31, 2022 deadline.

More information on how to sign up can be found at this link:

[https://www2.gov.bc.ca/gov/content/health/practitioner-professional\[1\]resources/pharmacare/pharmanet-bc-s-drug-information-network/prime](https://www2.gov.bc.ca/gov/content/health/practitioner-professional[1]resources/pharmacare/pharmanet-bc-s-drug-information-network/prime)

Questions about signing up should be directed to PRIMESupport@gov.bc.ca or 1-844-397-7463.

We Want to Hear From You

The College would be interested to hear registrants' perceptions of Pharmanet/Prime as we understand some of you have had issues with it.

This short anonymous survey will take you no more than 1 or 2 minutes to complete and would help us a great deal in making it more user-friendly. The survey is, however, completely optional. If you'd like to participate, just click on the link below. If you could kindly complete the survey by the end of the day, Friday, November 4, that would be great.

<https://www.surveymonkey.com/r/PharmanetPrime>



A Note From the Registrar

Fall has finally arrived in BC and the long days of summer are behind us. Please take some time to enjoy the beauty of fall – in between the rainstorms.

I trust you find this October newsletter of interest and that you will take the time to fill out the survey pertaining to Pharmanet/PRIME. Your input is important to us.

As registration time is upon us, you will note that there is a modest increase in fees this year. We worked hard to keep them as low as possible and we thank you for your understanding.

We hope that you find the Health Canada information on advertising helpful.

Stay well.

Carina Herman

We acknowledge with respect that the land on which we gather is the unceded and traditional territories of the Coast Salish peoples - sk̓wx̓wú7mesh (Squamish), sel̓íl̓wítulh (Tseil-Waututh), and x̓w̓m̓əθk̓w̓əy̓əm (Musqueam) nations whose historical relationships with the land continue to this day.



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