

# What We Heard – At a Glance

## Regulations Consequent to the Professional Governance Act

**From October 30, 2018 to March 4, 2019,** British Columbians were invited to review and comment on key topics described in an [intentions paper](#) to inform the development of policy and regulations for implementing the Professional Governance Act (act). The intentions paper did not give policy proposals but outlined a range of models or options that could inform policy development for A) the granting of practice rights to regulatory bodies under the act; B) the regulation of firms; and C) when and how declarations of competency and declarations of conflict of interest may be filed. The following summary was produced by the Ministry of Environment and Climate Change Strategy (ministry) to accompany the “[What We Heard](#)” Final Report submitted to the ministry.

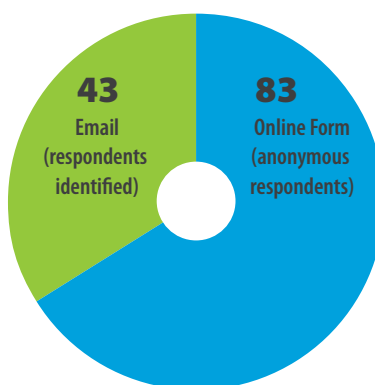
### How feedback was submitted

Feedback was mostly submitted through an online form on the [govTogetherBC website](#) which asked for responses to 46 questions across the three topic areas. Responses were anonymous; however, information about respondent background/interests in the ministry’s intentions was collected and is presented in Figure 3 (note that some respondents identified with more than one category). A number of email submissions were also received from organizations or individuals providing their thoughts on the three policy topics. Figure 2 shows the types of entities that provided submissions by email.

1. <https://engage.gov.bc.ca/app/uploads/sites/272/2018/10/Regulations-Intentions-Paper-Consequent-to-the-Proposed-Professional-Governance-Act.pdf>
2. <https://engage.gov.bc.ca/professionalreliance/>
3. <https://engage.gov.bc.ca/professionalreliance/>

### Submissions Method (Fig 1)

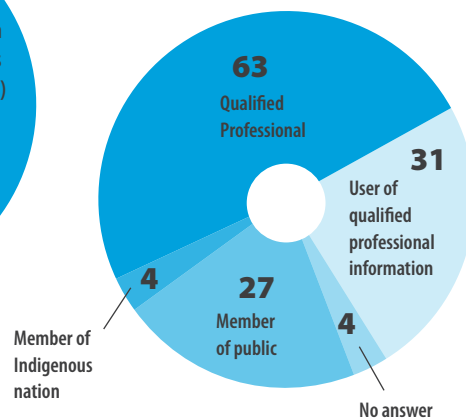
(Fig 1)



### Respondents using Email Submission (Fig 2)



### Background of Respondents using Online Form (Fig3)



### Number of Comments Received

Respondents provided feedback to the intentions paper



### A) Practice Rights

- Some respondents were supportive of granting practice rights to Applied Science Technologists and Technicians, College of Biologists and BC Institute of Agrologists, while others did not support these professions having practice rights.
- There was no clear frontrunner for a practice rights model (exclusive scope of practice, overlapping scope of practice or shared scope of practice with restricted activities) - respondents found benefits and concerns with each, noting that the models must be flexible to evolve with changes in the professions.
- Respondents emphasized the importance of ensuring professionals practice in their areas of competency and that they know their limitations.
- Respondents want to see risk-based exemptions that do not result in unregulated persons practicing within a regulated scope.
- Respondents want to see a thoughtful transition to practice rights to minimize impacts to practitioners in a profession who are not registered professionals.

### B) Regulation of Firms

- Some respondents support firms being regulated, while others do not support regulation of firms at all.
- Respondents varied in their preferences for how regulation of firms might be rolled out.
- Respondents support consistent requirements for firms that provide fee-for-service, those that employ in-house professionals, and government entities.
- There was equal support for and against sole proprietors being regulated as firms.
- Respondents support regulatory alignment across professions for multidisciplinary firms.

### C) Declarations of Competency and Declarations of Conflict of Interest

- Some respondents support the declaration requirements while others do not agree with them.
- Respondents had concerns about administrative burden of requirements, and provided suggestions to develop risk-based criteria to limit the number of circumstances requiring declarations for those involving higher risk.
- Respondents support building declaration requirements into professions' existing project documentation requirements to prevent duplication.
- Respondents support an electronic filing system for declarations, transparency of declarations, and government leadership in administration.
- Some respondents support the role of the Office of the Superintendent of Professional Governance in identifying patterns and developing advice and policy for regulatory bodies to oversee conflict of interest requirements for their registered professionals, while other respondents do not support this role for the Office.