



College of  
**Speech and Hearing**  
Health Professionals of BC

Regulator of Audiologists, Hearing Instrument  
Practitioners and Speech-Language Pathologists

December 20, 2017

VIA EMAIL: [PROREGADMIN@gov.bc.ca](mailto:PROREGADMIN@gov.bc.ca)

Mark MacKinnon, Executive Director  
Professional Regulation & Oversight Branch  
Clinical Integration, Regulation, and Education Division  
Ministry of Health  
PO Box 9639, Stn Prov Govt  
Victoria, BC V8W 9P1

**ATTN: MARK MACKINNON**

Dear Mr. MacKinnon:

On December 1, 2017, the Board of the College of Speech and Hearing Health Professionals of British Columbia (CSHHPBC) approved amendments to the CSHHPBC Bylaws.

The amendments add other delegable activities described in the Regulation to the existing Part 12, and are required to correct an error created when the Part was first brought into force. For example, for a non-registrant to perform the restricted activity described in section 5(1)(c) of the Regulation, it follows that registrants must also be able to delegate performance of the restricted activity described in section 5(1)(b) -- i.e., a delegated non-registrant must be authorized to put an instrument or a device or a finger into the external ear canal, up to the eardrum, in order to perform tympanometry as is currently provided for under the Bylaws. The Bylaws are currently silent in delegation of an activity described in section 5(1)(b) of the Regulation. This error currently exists in respect of all three professions.

The amendments do not pose any increased risk to the public. The additions do not impact a registrant's discretion to identify which aspects of practice to delegate. In addition, the registrant maintains the right to deny delegation to non-registrant support personnel based on, among other things, the client's/patient's condition and the competency level of the non-registrant. The non-registrant remains under the supervision of a registrant who is ultimately responsible for their conduct.

Finally, the addition of the word 'clinical' clarifies and ensures that administrative or clerical staff cannot be delegated to, thereby further reducing any risk to the public.

A copy of the proposed amendments is being distributed to BC health professions colleges and posted on the CSHHPBC website to ensure that the public and other interested stakeholders may view the Board-approved amendments in a timely manner.

**COMMENTS:**

Please submit comments on these amendments by March 20, 2018 to:

<b>CSHHPBC: Email/fax</b>	<b>Ministry of Health: Email/online</b>
<ul style="list-style-type: none"> <li>▪ Email: <a href="mailto:registrar@cshhpbcc.org">registrar@cshhpbcc.org</a></li> <li>▪ Fax: (604) 568-1566</li> </ul> <p><b>Attention:</b> Registrar &amp; CEO</p>	<ul style="list-style-type: none"> <li>▪ Email: <a href="mailto:PROREGADMIN@gov.bc.ca">PROREGADMIN@gov.bc.ca</a></li> <li>▪ Online: <a href="#">Feedback Form</a></li> </ul> <p><b>Attention:</b> Executive Director, Professional Regulation &amp; Oversight Branch</p>
<b>CSHHPBC: Ordinary mail</b>	<b>Ministry of Health: Ordinary mail</b>
<p>College of Speech and Hearing Health Professionals of British Columbia 630 – 999 West Broadway Vancouver, BC V5Z 1K5</p> <p><b>Attention:</b> Registrar &amp; CEO</p>	<p>Professional Regulation &amp; Oversight Branch Clinical Integration, Regulation, and Education Division Ministry of Health PO Box 9639, Stn Prov Govt Victoria, BC V8W 9P1</p> <p><b>Attention:</b> Executive Director, Professional Regulation &amp; Oversight Branch</p>

## CSHHPBC Bylaw Amendments – Part 12 – Delegation to non-registrants

### Part 12– Delegation

#### *Definitions*

138. In this Part:

“**communication health assistant**” means a non-registrant employed by a registrant or a registrant’s employer to support the registrant’s clinical practice of audiology, speech-language pathology or hearing instrument dispensing.

#### *Delegation*

139 (1) A registrant must not delegate an aspect of practice to a non-registrant except in accordance with this Part, the Standards of Practice and all applicable clinical decision support tools.

(2) A registrant may delegate to a non-registrant an aspect of practice that does not include the performance of a restricted activity if the registrant is satisfied the non-registrant is competent to provide or perform that aspect of practice safely and in accordance with the Standards of Practice and all applicable clinical decision support tools.

(3) Subject to subsections (4), (5) and (6), a registrant must not delegate to a non-registrant an aspect of practice that includes the performance of a restricted activity.

(4) An audiologist may delegate to a communication health assistant an aspect of practice that includes the performance of one or more of the following restricted activities:

(a) the restricted activity described in section 5(1)(b) of the Regulation;

~~(a**b**) the performance of~~ the restricted activity described in section 5(1)(c) of the Regulation, provided the performance of that restricted activity is not for the purposes of cerumen management;

~~(b**c**) the performance of~~ the restricted activity described in section 5(1)(e) of the Regulation.

(5) A hearing instrument practitioner may delegate to a communication health assistant an aspect of practice that includes the performance of one or more of the following restricted activities:

(a) the restricted activity described in section 5(2)(a) of the Regulation;

(b) the restricted activity described section 5(2)(b) of the Regulation, provided the performance of that restricted activity is not for the purposes of cerumen management;

(6) A speech-language pathologist may delegate to a communication health assistant an aspect of practice that includes the performance of one or both of the restricted activities:

(a) the restricted activity described in section 5(3)(b) of the Regulation;

(b) the restricted activity described in section 5(3)(f) of the Regulation.

(7) When delegating an aspect of practice that includes a restricted activity under subsection (4),

(5) or (6), a registrant must

(a) be satisfied the communication health assistant is competent to provide or perform the aspect of practice safely and in accordance with the Standards of Practice and all applicable clinical decision support tools, and

(b) provide the communication health assistant with appropriate instructions specific to providing or performing the aspect of practice on the client.

#### *Ultimate responsibility*

140 When a registrant delegates an aspect of practice to a non-registrant, the registrant remains ultimately responsible for the quality of care provided by the non-registrant.