GTA PAIN & STRESS CLINIC

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March 2, 2022

Dear Premier Ford and Honourable Members of Provincial Parliament,

Further to the letter and petition you may have received yesterday on behalf of the professional members of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO), below please find a summary of our requests.

In spite of what the *Traditional Chinese Medicine Repeal Act, 2022* of *Bill 88, Working for Workers Act, 2022,* Schedule 5, assumes, the de-regulation of Traditional Chinese Medicine (TCM) and acupuncture is not in the best interest of the general public. The dissolution of the CTCMPAO is a serious public health risk as it allows untrained individuals to perform the controlled acts of performing acupuncture below the dermis and mucous membranes, and communicating a TCM diagnosis.

In unskilled hands, acupuncture can cause life-threatening injuries like pneumothorax and even death.
We respectfully ask for your reconsideration for the following reasons:

1. The *Traditional Chinese Medicine Repeal Act, 2022* of *Bill 88, Working for Workers Act, 2022,* Schedule 5 (hereinafter "Schedule 5"), will remove the safeguards, standards of practice, and professional competencies required by CTCMPAO members. These are put into place to ensure the safety of the public; the very users of Traditional Chinese Medicine and acupuncture.
2. The CTCMPAO also sets jurisprudence and ethical standards of practice to protect the public. Schedule 5 dictates that all current investigations and proceedings into misconduct shall be dropped. The dissolution of the CTCMPAO would allow these individuals with active complaints and those who have decisions against them to continue to practice. This removes public protection and poses another threat to public health, both on the physical and mental levels.
3. The practice of Traditional Chinese Medicine and acupuncture is a regulated health profession. As such, our profession is under the authority of the Ontario Ministry of Health and not the Ontario Ministry of Labour, Training and Skills Development, whose expertise is not in the field of health care regulation.
4. Schedule 5 is discriminatory toward predominantly Asian health practitioners, as only the Traditional Chinese Medicine and the acupuncture profession was singled out, despite there being twenty-six health professions regulated under the RHPA.
5. Schedule 5 will have a direct negative impact on the public's ability to access Traditional Chinese Medicine and acupuncture as part of their health care.
6. Schedule 5 will give insurance companies the opportunity to deny the coverage of acupuncture when it is performed by TCM-trained acupuncturists. Instead insurance companies might favour non-TCM trained regulated health practitioners, who generally have less training and scope in the practice of acupuncture.
7. Schedule 5 will negatively impact the 2,760 registered members of the CTCMPAO,our families, jobs, and businesses and subsequently the businesses we frequent.
8. Schedule 5 will have a negative impact on the fifteen TCM and acupuncture educational institutions, thirteen of which are private colleges and two of which are community colleges, and their staff, teaching faculty, program directors, and owners.
9. Schedule 5 will have a negative impact on the hundreds of students enrolled in programs and new graduates across the province.
10. Schedule 5 will negatively impact on the required competency standards for the practice of TCM, the professional standing of TCM and hence the public's access to safe, competent and professional health care services.

We are aware that those who lobbied for the de-regulation of TCM and acupuncture had valid issues with the English language requirements set out by the CTCMPAO. Rather than dissolve the CTCMPAO, which will be a lengthy and arduous process that negatively impacts thousands of your constituents, we respectfully bring forth the recommendation that the province of Ontario follow in British Columbia's footsteps and allow for both the Chinese and English languages in practice.
We implore you to make the right decision.

Respectfully yours,

Sophia Fang, Registered Acupuncturists of Ontario, Professional Members of the CTCMPAO

Encl. Petition to the Legislative Assembly of Ontario

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Petition

To the Legislative Assembly of Ontario

WHEREAS the Government of Ontario has put into the motion the *Traditional Chinese Medicine Repeal Act, 2022* of *Bill 88, Working for Workers Act, 2022,* Schedule 5 and intends to dissolve the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO),

WHEREAS the dissolution of the CTCMPAO and the de-regulation of traditional Chinese medicine and acupuncture will cause a serious public health risk and put members of the public at risk for grave injury and death,

WHEREAS thousands of stakeholders will be negatively impacted by the dissolution of the CTCMPAO and the de-regulation of traditional Chinese medicine and acupuncture; including patients, members of the public, practitioners, students of Chinese medicine and acupuncture, employees, directors, teaching faculty and owners of educational institutions,

WHEREAS the dissolution of the CTCMPAO and the de-regulation of traditional Chinese medicine and acupuncture will contribute to the loss of professional esteem,

We, the members and stakeholders of the CTCMPAO, the undersigned, respectfully request and petition that:

1. The Legislative Assembly of Ontario reconsider and remove Schedule 5 of *Bill 88, Traditional Chinese Medicine Repeal Act, 2022* from the *Working for Workers Act, 2022.*
2. The Legislative Assembly of Ontario allow public hearings with input from stakeholders and experts during the Review by Committee phase after the Second Reading.
3. The Legislative Assembly of Ontario investigate and answer the question of why only the TCM Act and the members of its self-governing professional body is targeted in *Bill 88, Working for Workers Act, 2022.*
4. Rather than dissolve the CTCMPAO and de-regulate TCM and acupuncture, instead follow in British Columbia's footsteps and implement their decision to allow for both the Chinese and English languages in practice, as the English language requirement was a main reason that deregulation was lobbied for.

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