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Application ID: 57431

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Bill or item of business: **Bill 88, Working for Workers Act, 2022**

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Full name

Meghan DeSouza

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Re: Bill 88

Section 5- the Repeal of the Chinese medicine act.

By Meghan DeSouza (1147 Taffy Lane, Ottawa, ON)

March 3rd 2022

Hello, My name is Meghan DeSouza, I live and work in Ottawa. As a registered acupuncturist in Ontario the news of Bill 88, especially section 5- the repeal of the Chinese Medicine Act earlier this week caused extreme distress. I have numerous concerns about this bill.

On the surface this is made to appear as though it is simply a change in regulation. I do not believe this to be the case. Moving acupuncture and traditional Chinese medicine to the same voluntary regulatory board as PSWs will not provide safety for the public as has been stated by Minister Elliot on March 3rd, or Premiere Ford in a press conference on the same day. Voluntary means any unscrupulous practitioner

can simply decide not to register. Having a mandatory regulatory college offers much more protection. The public needs that protection to know that they will be receiving not only effective healthcare, but also safe healthcare.

Chinese medicine includes the use of herbal medicine, which can be dangerous if prescribed incorrectly, or without proper consideration of interaction with prescription medication. Proper testing and regulation makes sure there are checks and balances in place so herbal medicine is safe (it also ensures that herbal products are approved for use, and do not contain contaminated or counterfeit ingredients). It ensures minimum educational requirements and continuing education requirements. Saying that Chinese medicine has been practised for thousands of years safely without registration is only partially true. It may have been true in the past but it is not the standard now. Across China and most of the rest of the world acupuncturists and TCM practitioners are regulated by a college. Deregulating will set Ontario back decades and cost jobs. Do you think highly trained and skilled practitioners will choose to immigrate to a province where their field is so disregarded as to not require mandatory regulation? It is true that some make the argument that many older practitioners may have learned acupuncture and Chinese medicine from their elders. If that is the case, and they have the knowledge to practise safely they should be able to easily pass an exam offered in their language.

The language barrier is certainly an issue within the Chinese community, and a definitely a barrier to regulation. However this can be easily solved by offering the Pan-Canadian board exams in Chinese, as is the case in BC where acupuncture and TCM have been regulated since before they were in Ontario. This is also standard in California where the exams are offered in English, Chinese, Korean and Japanese. It would be safer for the public to offer that than do away with regulations altogether.

In the email members received from the CTCMPAO it stated all current investigations into practitioner misconduct, including malpractice and sexual assault would cease. This is a big deal! Who will tell the victims that because of a bureaucratic change their case will not go forward. Who will protect future victims? Healthcare practitioners need to be held to a higher standard. We need to consider ethics in how we treat patients, and we work with vulnerable populations like children, the elderly, and people with mental health concerns. We need to maintain complete and confidential health histories of our patients and being members of the RHPA makes sure we have to follow HIPPA guidelines for safe record handling and storage. Patients will not want to see someone who may not be storing their personal information properly.

Traditional Chinese medicine and acupuncture are healthcare, to lump it in with tattoo shops for public health units to monitor is insufficient. Yes, both need to be careful of infection control but tattooing carries no risk of lung puncture, organ damage or death. I ask you in all seriousness, would you like someone untrained, or with unproven training, poking needles in your body? How about an Engineer who learned by watching their dad Would you let them build you a bridge, without first writing an exam to make sure they know how to build a bridge? Would it be ok if they joined a voluntary engineer group and told the group they know how to build bridges? This is essentially what this bill is proposing. Rather than deregulating the entire profession it seems to make more sense to make changes to the current regulation to allow those with knowledge and training to qualify? Stop throwing the baby out with the bathwater! Let those of us who are currently members of the CTCMPAO continue to practice as is and change the language options for testing to allow those who meet standards qualify.

On a personal level this bill will hurt people in Ontario. It will hurt me, my patients and my family. I have dedicated the last 15 years of my life to caring for my patients. I spent thousands of dollars on my education to qualify as an acupuncturist, and meet CTCMPAO requirements for registration. I have paid

my yearly \$1300.00 registration fees, maintained malpractice insurance and met continuing education and quality assurance requirements. I safely worked through COVID following MoH guidelines and provided much needed mental health care for my patients who have suffered greatly. I provided pain relief and fertility treatments when they were unable to see their Doctor in person. I listened to them cry when the stress of COVID life was too much. If my patients lose their insurance coverage, which is a very real possibility, they will stop coming, they will lose an important part of their healthcare and I will lose my livelihood. My family with two small children will be down to a single income. My patients will seek alternate health care which may be less effective, or put further burden on our already overburdened hospital system when their symptoms become unmanageable. My entire career will have been for nothing. This is devastating.

Please do not pass this bill. It is a dangerous mistake. People are going to get hurt, some people may die. Please leave section 5 out please use your power and influence to actually help people by making a language accommodation for the Chinese speaking community to prove their knowledge and qualify. Thank you.