

Notice to the Professions

Renew registration on time to avoid having your registration cancelled – 10 serious consequences if your license to practice is cancelled and you become a former registrant

October 12, 2023

Registration renewal

Under section 78(5) of CSHBC's Bylaws, a registrant who fails to renew registration by the deadline of March 31, 2024, will have their registration cancelled automatically, regardless of the reason they failed to renew. Once a person's registration is cancelled, the person becomes a former registrant.

Under Bylaw section 80(c), a former registrant may apply for reinstatement until the reinstatement deadline of April 30, 2024. However, once the deadline has passed, a former registrant who wishes to re-register with the College must submit a new application for registration. This may pose issues for former registrants who first registered with CSHBC under previous, less stringent registration requirements.

Certification renewal

Under section 95(4) of CSHBC's Bylaws, a registrant who fails to renew a Certified Practice (CP) certificate before the expiry date of the certificate, will have their certification cancelled automatically, regardless of the reason they failed to renew. Continuing to practice under the scope of an expired CP certificate constitutes unlawful practice, which is subject to disciplinary action by CSHBC. For more information, see [Application For A Certified Practice Certificate](#).

10 significant consequences of having your registration cancelled and becoming a former registrant

Cancellation of registration and becoming a former registrant may result in at least 10 significant consequences:

1. A registrant who forgets to renew registration is likely to engage in unlawful practice and unlawful use of a reserved title by inadvertently continuing to practice after their registration has lapsed. CSHBC actively enforces against unlawful practice, which is an

offence under the *Health Professions Act*. The College may take legal action against anyone who engages in unlawful practice and/or use of title.

2. A former registrant who knowingly engages in unlawful practice may bring their good character into question, which is a requirement for a new grant of registration.
3. A former registrant must cease practice once they become aware they have lost registration, including while they wait for a new grant of registration. This may result in interruption in patient care, lost income, and financial hardship.
4. A former registrant whose registration has lapsed may breach an ongoing requirement for ongoing registration or licensure in an employment contract, or in a contract for services.
5. A former registrant may inadvertently misrepresent their registration status to one or more clients, resulting in a lack of informed consent to treatment.
6. A former registrant whose registration has lapsed may invalidate their professional insurance. Alternatively, an insurer may deny an insurance claim relating to a period of non-registration. Lack of insurance coverage represents a significant risk to a client and exposes the former registrant to a risk of personal liability.
7. A former registrant who provides a professional opinion on accommodation for a physical or mental disability, while their registration has lapsed, may compromise the validity of the opinion for the client who is relying on the opinion to seek an accommodation.
8. A former registrant who provides a professional opinion in writing or via oral testimony (e.g., as an expert witness), while their registration has lapsed, may compromise the validity of the opinion for the client who is relying on that opinion for a court or other proceeding.
9. A former registrant whose registration has lapsed may, when retained to provide an expert opinion, contravene an express or implied contractual requirement that they maintain registrant status.
10. A former registrant who has engaged in unlawful practice, even inadvertently, may be unable to recover professional billings or expert witness fees for that period, or be forced to return salary or billings they have already received. Section 13(2) of the *Health Professions Act* states: “a person must not recover any fee or remuneration in any court in respect of the provision of the service unless, at the time the service was provided, the person was a registrant of the college....” A former registrant may need to return any fee or remuneration to which they lack entitlement. This may result in lost income and financial hardship.

Tips to avoid cancellation of registration and becoming a former registrant

CSHBC is posting this Notice to the Professions well before registration renewal for 2024/2025 opens, to reinforce the consequences of failing to renew on time, to remind registrants of their professional responsibility, and provide tips for avoiding cancellation of registration, including the following:

- Start the registration renewal process well before March 31. If you start early, there will be time to ask CSHBC questions if any issues come up during the renewal process. In early 2024, watch for a Notice to the Professions announcing when registration renewal will open. Information about registration renewal for 2024/2025 will also be posted on the Registration & Certified Practice Certificate Renewal page.
- Starting the registration renewal process early will also help ensure that you have met registration renewal requirements, which include:
 - You hold valid professional liability insurance.
 - You have completed the online learning courses for *Jurisprudence* and *Client Consent* (mandatory for all registrants registered with the College on or after April 1, 2023). If you have not completed required online learning courses, CSHBC recommends meeting this requirement as soon as possible.
 - Any outstanding fees and/or fines have been paid.
 - Check the Registrant Portal to make sure your primary email address is up to date. The College sends emails regarding registration to primary emails listed in the Registrant Portal.
 - Check your email junk folders to ensure that CSHBC emails are not caught in those folders.