

## Notice to the Professions

### Information about CSHBC's Administration of BC's Criminal Records Review Program

March 1, 2019

Under BC's *Health Professions Act* and the *Criminal Record Review Act*, the College of Speech and Hearing Health Professionals of British Columbia is required to administer Criminal Record Checks (CRCs) of CSHBC registrants, as part of the [Criminal Records Review Program](#) (CRRP), on behalf of the Ministry of Public Safety & Emergency Services. Under BC law, CRCs obtained from a municipal or federal law enforcement agency do not meet the requirements of the CRRP – registrants must obtain CRCs through BC's CRRP.

Each of the College's 1,800+ registrants hold CRCs with **individual** expiration dates and years. Given the limitations of our current payment system, and to ensure that no registrant practises without a current CRC, the College collects CRC fees at the registration renewal deadline of March 31. Registrant CRCs remain valid for five years **as of the individual date and year of their updated clearance**.

Unlike a registrant's registration renewal date, or the expiry date of an individual's driver's license – two examples of fixed expiry dates – subsequent CRC periods depend on **updated clearance dates**. That said, the College only has the capacity to collect the fees at the one, fixed date.

To ensure that registrants always have a current and valid CRC throughout the entire registration year (April 1 through March 31), the College must submit all requests for Ministry clearances **before** the expiration of a registrant's current CRC. In addition, the College requires lead time to submit clearance requests to the Ministry – requests cannot be submitted **after** the current CRC expires.

#### **For example:**

- If a registrant's current CRC expires on March 31, 2019, the College must submit the update request to the Ministry well in advance of the March 31 deadline.

Currently, requests for clearances are sent to the Ministry in quarterly batches according to CRC expiration dates and years.

***For example:***

1. For a CRC expiring in July 2019 (Q2 of the College's fiscal year), the request would be sent to the Ministry in approximately April 2019 (Q1). If the new CRC is cleared in **May 2019**, the new CRC would be **valid from May 2019 to May 2024**. If the new CRC is cleared in **June 2019**, the new CRC would be **valid from June 2019 to June 2024**.
2. For a CRC expiring in February 2020 (Q4 of the College's fiscal year), the request would be sent in approximately December 2019 (Q3). If the new CRC is cleared in **January 2020**, the new CRC would be **valid from January 2020 to January 2025**. If the new CRC is cleared in **February 2020**, the new CRC would be **valid from February 2020 to June 2025**.

Thus, the new expiry date is based on the CRC clearance date; something that is determined by the Ministry and beyond the College's control.

Obviously, this is less than ideal. Over time, the College has made ongoing changes to improve the system, and we will continue to improve the process going forward. As members of the BC Health Regulators (BCHR) group, all 20 colleges in BC have requested Ministry assistance in making additional process improvements province wide. In future, we hope to have the resources and capacity to collect CRC fees at any time throughout the year. We hope this will result in the capacity to submit CRC submissions to the Ministry monthly rather than quarterly. In the meantime, we ask for your patience and understanding as we do our best to ensure registrants are fully compliant with BC law, with very limited resources and outdated technology.

If registrants have an updated clearance letter from the Ministry, they can submit it to, or share the results with (our organization number is 52), the College at any time. In such cases, the College will update a registrant's record. For registrants who are also required to obtain an updated CRC clearance for another organization (e.g., the RASP, their employer, a volunteer organization, etc.), they can share the College's clearance with that organization by submitting the share form linked above.

Finally, as the College does not retain CRRP fees, and CRCs are required under BC law, the College cannot provide CRC fee refunds to registrants. Interest accrued by the College from submitting collected CRC fees in quarterly batches to the Ministry totals approximately .15 cents per registrant per five-year CRC period.

For further information, please contact the College.