

Notice to the Professions

Reminder to registrants: QAPP Program requirements apply to Non-practicing registrants

August 29, 2023

CSHBC reminds registrants that if you change to Non-practising registration, you are still subject to Quality Assurance & Professional Practice (QAPP) Program requirements specified in the CSHBC Bylaws. Registrants who have or will be changing to Non-practising, or who are contemplating making this change, should read the following important notice carefully.

Continuing Competency Credits

Registrants who change to Non-practising registration during a three-year QAPP Program reporting cycle are still subject to Continuing Competency Credit (CCC) requirements, which are the same requirements that Full and Conditional registrants are subject to. For information on the requirements, see the CCC requirements section below.

CSHBC has designated three-year QAPP Program reporting cycles (e.g., 2022-2024, 2025-2027, etc.). At the end of each cycle, CSHBC assesses whether all registrants have reported the required number of CCCs.

Practice hours

Registrants who change to Non-practising registration during a three-year QAPP Program reporting cycle are still subject to Practice Hour (PH) requirements. For information on the requirements, see the PH requirements section below.

For registrants who change to Non-practising and then apply to revert back to Full registration during the same cycle, at the end of the cycle, CSHBC assesses whether these registrants have reported the required PHs. For registrants who remain Non-practising at the end of the cycle, CSHBC assesses whether those registrants have reported the required PHs when they apply for Full registration. Any registrant who is Non-practising at the end of a cycle must, when later applying to revert to Full registration, report their PHs for that earlier cycle.

Mandatory deficiency plans

Registrants who fail to meet CCC or PH requirements, as confirmed when either type of requirement is assessed, must submit and obtain approval for a deficiency plan. A registrant who fails to submit and obtain approval for a required deficiency plan is ineligible for both registration renewal and reinstatement. **This means a registrant who fails to submit a required deficiency plan – including when a registrant has been “Non-practising” for the maximum of three consecutive years – cannot renew registration, will have their registration cancelled, and may only re-obtain registration through a fresh application for registration under current registration requirements.**

CSHBC Bylaw requirements

More details about CCC and PH requirements under the CSHBC Bylaws are as follows:

CCC requirements

- A Non-practising registrant must complete and report not less than 45 CCCs within a cycle (Bylaw s. 159(1), and an additional 15 CCCs for each additional profession registered in (Bylaw s. 159(2).
- A Non-practising registrant who fails to complete and report required CCCs by the end of a cycle must submit a deficiency plan before either February 15 (without a deficiency plan fee) or March 31 (with a deficiency plan fee) of the next calendar year (Bylaw s. 162).
- **A Non-practising registrant who fails to submit and obtain approval for a deficiency plan by the March 31 registration renewal deadline does not qualify for renewal under section 78, due to a failure to comply with Bylaw ss. 159-162 and will have their registration cancelled.**
- A former registrant who has failed to complete and report required CCCs and has had registration cancelled for failure to renew (for any reason, including for failing to submit a deficiency plan) does not qualify for reinstatement (since Bylaw s. 80(c)(v)(A) requires compliance with Bylaw ss. 159-161).

Practice hour requirements

For Non-practising registrants who revert to “Full” registration within a cycle:

- A Full registrant must complete, and report, required PHs within a cycle: the basic requirement of 750 PHs (Bylaw s. 161(1), and an additional 250 PHs for each additional profession registered in (Bylaw s. 161(2)).
- A Full registrant who fails to complete and report required PHs by the end of a cycle must submit a deficiency plan before February 15 (without a deficiency plan fee) or before March 31 (with a deficiency plan fee) of the next calendar year (Bylaw s. 162).
- **A Full registrant who fails to submit and obtain approval for a deficiency plan by the March 31 registration renewal deadline does not qualify for renewal, due to a failure to comply with Bylaw ss. 159-162 (Bylaw 78) and will have their registration cancelled.**
- A former registrant who has failed to complete and report required PHs and has had registration cancelled for failure to renew (for any reason, including for failing to submit a deficiency plan) does not qualify for reinstatement (since Bylaw s. 80(c)(v)(A) requires compliance with Bylaw ss. 159-161).
- If the registrant has not completed, and reported, required PHs for the earlier cycle, they must submit and obtain approval for a deficiency plan as a pre-condition of Full registration (Bylaw s. 64(6)).