

# Cross Provincial Practice Guide

This Guide will help you apply for the Cross Provincial Practice registration.

## What is Cross Provincial Practice (CPP)?

Several provinces have agreed to allow audiologists and speech-language pathologists to provide a limited amount of care across provincial boundaries. The purpose is to enhance access to care for clients/patients.

This agreement is called a Memorandum of Understanding. It allows for registrants who hold a **full practicing license** in one participating province (the primary province) to apply for Cross Provincial Practice registration in another participating province (the secondary province). Registrants must apply for a separate cross provincial practice registration in each secondary province they wish to practice.

Cross Provincial Practice registration allows the registrant to provide a **maximum of 200 direct client/patient care hours** in the secondary province **over a 12-month period**. The care can be delivered in person or virtually. The number of direct client/patient care hours in the secondary province(s) must not exceed the number of direct client/patient care hours in the primary province.

The agreement makes it easier and more cost effective for SLPs and AUDs who are already registered in a primary province to register and provide client/patient care in a secondary province. The process is faster, and the fees are lower than applying for full registration.

It is each registrant's responsibility to inform themselves adequately in order to adhere to all the legislation, regulations, by-laws, standards, guidelines and advice in the province where they are registered with a secondary registration. Carefully review the **Practice Differences Across Provinces: Key Links** chart, which outlines important differences in practice requirements between provinces.

You will find definitions for terms used at the end of this Guide on page 6.

## Participating provinces

1. Alberta
2. Manitoba
3. New Brunswick
4. Ontario
5. Saskatchewan

We anticipate that more provinces will be signing the Memorandum of Understanding and agreeing to offer this type of license/permit. Check with your primary province to get up-to-date information on participation.

### ***Why aren't all provinces participating?***

Each province must determine if they are able to participate. Every province has different governing legislation and/or by-laws. Some may wish to participate but must change these laws, which takes time. Others may never be able to change the laws that would allow for this kind of registration.

## **What Specifically Does Cross Provincial Practice Registration Allow?**

You will be able to provide direct care to those who live in the province where you hold a Cross Provincial Practice registration. You can provide up to **200 hours of client/patient care**. This is a sum total of all the direct care hours for all your clients/patients. **This is not 200 hours per client/patient.**

Your Cross Provincial Practice registration will be **valid for 12 months** from the date on which you receive your Cross Provincial Practice registration in that province. Your Cross Provincial Practice registration will expire after 12 months.

If you wish to continue practicing in that province, you must re-apply for a new registration.

### ***Why isn't there an annual renewal?***

The participating provinces designed this license to meet short term, limited needs of client/patients. Typically, these are patients/clients who need follow-up care from their original provider in another province, or do not have access to comparable care where they live. The likelihood is most applicants will be able to provide effective care within 12 months.

If a full practicing registration would better meet the client/patient needs, that is always an option.

### ***Can I work beyond the 12-month limit of the Cross Provincial Practice registration?***

If you wish to continue to provide services to any clients/patients in the secondary province, after your 12-month registration has expired, you must re-apply to the secondary province.

### ***Should I count by minutes to tally my direct client/patient care hours?***

When you enter the time spent providing service, use 15-minute increments. There is no need to break your time down further into minutes unless you prefer to do so. The total hours cannot exceed the 200 hours of direct client/patient care.

### ***Do I have to be working in my primary province?***

Yes, not only must you be working in your primary province, the **majority** of your direct client/patient care must be in your primary province. The total amount of client/patient-care across **all** the secondary provinces in which you are registered must be **less** than the total amount of care you provide in your primary province. For example, if your primary registration is in New Brunswick and you work ½ time, this can be considered approximately 672 hours of

direct client/patient care (approximately 17.5 hours per week over 48 weeks and assuming 80% of your working hours are direct client/patient care). Therefore, you must keep the total direct client/patient care hours, across all provinces where you hold a secondary registration, **under** 672 hours.

## How do I apply for a Cross Provincial Practice Registration?

You must contact the province where you wish to obtain the Cross Provincial Practice registration. Each participating province has their own process, forms, and fees for registering for Cross Provincial Practice.

There are four common requirements for the Cross Provincial Practice registration across the participating provinces:

1. The applicant must ask the regulator in their primary province to send a “Verification of Registration – Cross Provincial Practice” form directly to the secondary province’s regulator. The Verification of Registration- Cross Provincial Practice form must state:
  - The name of the certificate, license, or permit they hold in the primary province, and
  - That the applicant is in “good standing,” (see below for full description)
2. The applicant must complete an application form for the province to which they are applying.
3. The applicant must pay all applicable fees in the secondary province to register for Cross Provincial Practice.
4. You must be a fully practicing registrant in your primary province. This means you cannot be practicing under supervision, nor mentorship.

There will be **additional requirements** for each province you apply to for Cross Provincial Practice registration (such as police checks), as well as differing processes, and fees.

## What is the meaning of ‘in good standing’?

To be in “**good standing**” the applicant **must**:

- meet the requirements for continuing competence or quality assurance of the primary province
- have paid the applicable fees to be registered in the primary province; and
- not owe any debts to that regulator.

The applicant **must not** have:

- a suspension
- terms, conditions or limitations

- a complaint filed against them which is unresolved
- a Report (applicable to Ontario registrants)
- an active regulatory investigation
- an active referral to discipline proceeding
- unresolved disciplinary or conduct matters that are relevant to cross provincial practice, as determined by the secondary province.

***What if I do not comply with the continuing competence/quality assurance requirements in my primary province?***

If the issue becomes one for which the primary province takes formal action (such as a suspension) then that will be communicated, as outlined in the [agreement](#). This information will be acted upon by the secondary province, in accordance with their legislation, by-laws and policies.

***What if I do not meet the criteria for CPP registration?***

If you do not meet the 'requirements set for the CPP registration, you can contact the secondary province for registration options.

## **What are the professional liability insurance requirements for the secondary province?**

You must ensure you have the appropriate professional liability insurance both in your primary province and for the province where you are seeking secondary registration. You must also ensure whatever insurance you do carry allows for Cross Provincial Practice.

You may not need to obtain separate insurance coverage but check with your existing insurance provider to ensure you are covered in the secondary province and that the amount of coverage meets the secondary provinces requirements.

The attached "**Practice Differences Across Provinces: Key Links**" chart will direct you to the professional liability insurance requirements for each province.

## **How do I track client/patient hours?**

You are required to track all direct client/patient care hours whether they are provided virtually or in person. This refers to any direct care you provide to the client/patient or to their caregiver or family. For example, assessments, treatments, care via a support personnel would be counted. Similarly, advice you provide to significant others such as the caregivers, family, teachers or other professionals regarding your client/patient would also be counted.

**Note:** client/patient care hours do not include the SLP or AUD discussing their client/patient with other professionals for general advice regarding intervention with that client/patient.

You must not exceed 200 hours in total of direct care provided to the client/patient and/or to the caregiver or family when you add all the time spent with all your patients. Use the “**Client/Patient Care Tracking Form: Cross Provincial Practice**”. You must always be prepared to provide this completed form if requested from either the secondary or primary province.

***What activities are counted as ‘direct client/patient care’ services?***

Direct client/patient contact services means screening, assessment, treatment, counselling or consultation provided to a client/patient or anyone related to a cross provincial license holder’s client/patient in a secondary province. Anyone related refers to any caregivers or other professionals that you provide suggestions to as part of your care for your client/patient.

***How to I capture group intervention?***

Enter the initials of all participants in the first column of the Tracking Form and then record the total time that session was conducted on that date.

## **Is urgent care across provinces allowed?**

The participating provinces have agreed that you do not need to have a Cross Provincial Practice registration to provide brief help when a client/patient is temporarily in one of the participating provinces.

You can proceed without obtaining a Cross Provincial Practice registration but only if you are providing care that is:

- reasonably urgent and limited
- no more than a cumulative total of 3 hours
- across the 12 months
- to an existing client/patient

For example, your client/patient may need a hearing aid adjustment to manage a new listening environment they find themselves in while on vacation in another province. Similarly, your client/patient may benefit from a short intervention for managing their fluency in a new situation.

Remember the 3 hours of urgent care is a total amount across all client/patients you may be servicing. You should only provide brief direct care for any single client/patient, and retain the remainder of the 3 hours for any other urgent situations, as opposed to providing 3 hours to 1 patient.

**Please note**, this ONLY applies to participating provinces. If you wish to provide brief service to a client/patient in a non-participating province, you must contact the provincial regulator directly to see if you must register with them.

## Definitions

**Cross Provincial Practice** means a service that is within the practice of audiology or SLP provided by a registrant registered in their primary province (AB, ON, MB, NB, or SK) to a client/patient located outside of the primary province, into a secondary province (AB, ON, MB, NB, or SK), by virtual care or in-person care.

**Direct client/patient services** means screening, assessment, treatment, counselling or consultation provided to a client/patient or anyone related to a cross provincial license holder's client/patient in a secondary province.

**Primary Province** means the province where the registrant is registered as an active practitioner, who is not practicing under mentorship or supervision, and where a majority of that registrant's clients/patients habitually reside.

**Secondary Province** means the province where the registrant is not registered immediately prior to application for cross-provincial practice and where, after receipt of a cross-provincial registration, a minority of the registrant's clients/patients habitually reside.

**Virtual Care** means the provision of technology-enabled audiology and speech-language pathology services to clients/patients who are in a different location from the audiologist, speech-language pathologist, or supervised support personnel. Virtual care includes training or educating parents, partners, and significant others, via technology, for the benefit of the client/patient. It also includes technology-enabled instruction and consultation to support personnel and other professionals who are interacting with the client/patient in real time. Different formats of virtual care can include synchronous (interacting with the client/patient in real-time), asynchronous (interaction not occurring at the same time), telephone, video, audio, or written electronic formats (emails and text messages).