

September 10, 2019

Kathrina Loeffler | Executive Director, CMTCA
Iain Robertson | Chair, CMTCA

Via email

Dear Ms. Loeffler, Mr. Robertson:

Re: Massage therapy education program accreditation in British Columbia and July 29 stakeholders' meeting

Introduction

On July 29, 2019, CMTBC held a meeting to consult with stakeholders. Representatives of CMTCA attended, along with representatives from two BC government ministries, each of BC's massage therapy education programs, BC's massage therapy professional association, and CMTBC's Board. The goal of the meeting was to seek consensus on a path forward from the current status quo, and to explore stakeholder views on transferring the accreditation function from CMTBC to CMTCA.

CMTCA's letter of August 19, 2019, sent in response to the meeting and some follow-up communications, suggests that CMTCA sees no need to change its current position, even though a number of stakeholders expressed a desire to see improvements to CMTCA's transparency and a reduction in the cost of its services.

While CMTCA's response is disappointing, CMTBC nonetheless considers that it is time to move past the current impasse. By separate – and private – correspondence, I have sent you a signed copy of the CMTCA Funding Agreement, which I have amended from the template you sent me. Should CMTCA accept the terms of the amended agreement, funding is available beginning January 2020.

CMTBC's position on accreditation by CMTCA

CMTBC's position can be set out simply:

1. CMTBC agrees that it is desirable that massage therapy education program accreditation be performed by an independent third-party accreditation body.
2. CMTBC accepts (as it has since 2017) CMTCA's accreditation standards for the purposes of meeting CMTBC's statutory mandate under the *Health Professions Act* to recognize specified massage therapy education programs as "meeting standards of academic or technical achievement" for the purposes of entry to practice.

CMTBC has two core interests and objectives that are applicable to accreditation:

1. To be a responsible steward of the funds provided to CMTBC by its registrants, and to expend those funds, efficiently and transparently, on programs that serve the public interest in British Columbia and are consistent with CMTBC's statutory mandate. While CMTBC is more than ready to work cooperatively on a national level, it is not prepared to expend registrant funds on operational costs that should be borne within or by another province or territory, or by a different stakeholder.
2. To ensure that massage therapy education program accreditation is carried out in BC, ideally by a third party, in a fair, efficient and transparent manner that serves the goal of ensuring that all applicants for CMTBC registration have the required competencies and knowledge at entry to practice.

CMTBC's conditions for funding

Given CMTBC's interests and objectives as set out above, its statutory mandate to protect the public, and the fact that all current BC massage therapy education programs are accredited, CMTBC's Board has determined that there are four key conditions to funding that CMTCA must meet. These are:

1. **CMTCA will agree to "grandfather" any BC massage therapy education program that currently holds full recognition status from CMTBC, that is on a current accreditation agreement with CMTBC. These programs should be eligible to apply for full CMTCA accreditation within the current accreditation period and should not be required to obtain preliminary CMTCA accreditation.**

Comment: Just as CMTBC recognizes CMTCA's accreditation standards as meeting CMTBC's threshold requirement for entry to practice, it would be equitable for CMTCA to recognize CMTBC's accreditation standards, and not require schools who have fully met those standards to return to preliminary accreditation status.

2. **CMTCA must commit to greater transparency with respect both to finances and to operations.**

Comment: Your letter of August 19, 2019 states that you are "open to input" about ways in which CMTCA might improve transparency. Here are three examples of such input:

- (1) Except for preliminary accreditation, CMTCA does not publish the length of its accreditation awards. This is significant since one-year accreditation by CMTCA means that a program may only have "partially met" CMTCA's accreditation standards, which is why CMTBC recognizes CMTCA accreditation only at the three- and five-year level. It may be that schools, especially schools with one-year accreditation, would prefer that

this information be non-public. However, CMTBC's mandate is to protect the public, and it is committed to doing so in as transparent a manner as the law will allow. It is our view that the public interest, which includes the interest of prospective students of CMTCA-accredited programs, is best served by full and transparent disclosure of all programs' accreditation status.

- (2) CMTCA has referred in its public communications to a contribution from regulators of \$22 per year per registrant over a "multi-year" agreement. It has also made public its intention to reduce the financial burden on regulators over time. However, CMTCA's Funding Agreement calls for regulator funding to *increase* from \$22 to \$23 per registrant in the second year, and to \$24 in the third year of the proposed three-year term. At the same time, CMTCA would commit contractually to working "to decrease the funding burden on the College", although it is not clear how this commitment squares with the proposed annual increase in the per-registrant cost. Greater clarity about the actual cost of accreditation would be helpful.
- (3) Transparency would be enhanced if CMTCA were to provide information broken down by province about where its expenses have been incurred. At the moment, CMTCA's financial reporting does not allow for confirmation that accreditation activities in a given province correspond even roughly to the level of funding received from that province.

3. **CMTCA must be prepared to make specific and binding performance commitments.**

Comment: CMTCA has made no specific commitments as to level of performance or service it will provide, for example with respect to timeliness, responsiveness, service quality, number of programs to be accredited, or any other performance metric. In its draft Funding Agreement, CMTCA states only that it will provide "Accreditation Services", which are undefined. It is impossible for any funder to hold CMTCA to performance commitments if CMTCA has not in fact made any specific commitments.

In your letter of August 19, you address the issue of "accountability" by stating that "CMTCA makes regular reports to provincial contributors". However, simply reporting on one's activities is not the same as holding oneself to specific standards and commitments, contractually or otherwise. For example, does CMTCA adopt the definition of accreditation put forward by the Association of Accrediting Agencies of Canada (AAAC)? Does it measure its own standards and processes by AAAC benchmarks? I note that the AAAC defines accreditation of professional education programs as "a process of quality assurance through which accredited status is granted to a program of study once it has met certain standards of education". Is this compatible with CMTCA's decision to accredit even schools that have only "partially met" CMTCA's own standards?

4. CMTCA must commit to exploring concrete ways to deliver on its promise of reducing registrant funding over time, reducing the overall cost of accreditation, and shifting the cost burden onto (or at least toward) the education programs, as originally planned.

Comment: Our understanding of the original vision of CMTCA was that it would require regulator funding on start-up but would transition over time to a self-funding model, i.e. funding entirely or primarily by the educational programs that are the direct recipients of the service. This original goal seems to be receding ever farther into the distance.

These are the key facts from CMTBC's perspective: (1) CMTBC is funded almost entirely by annual registrant fees; (2) CMTBC is primarily responsible to the public, but is also accountable to its registrants for how it spends the funds they provide, and (3) CMTCA's current funding model has the effect of allocating approximately 80% of the cost of accreditation to regulators (i.e. registrants), and only about 20% to education programs. This is not an equitable distribution in CMTBC's view. CMTCA should provide some evidence of a concrete plan to rebalance the distribution of this financial burden over time.

Conclusion

CMTBC organized the July 29 stakeholders' meeting in good faith, and at substantial time and expense, because it recognizes the importance of resolving the current funding impasse between CMTCA and CMTBC, and having a stable, long-term plan for program accreditation. CMTBC has:

- accepted CMTCA's accreditation standards;
- recognized the BC education programs accredited by CMTCA;
- offered to fund CMTCA on conditions (see above) that CMTBC's Board considers reasonable and necessary, given CMTBC's own entry to practice bylaws and the fact that most BC massage therapy education programs are still on accreditation agreements with CMTBC.

As mentioned above, CMTBC has sent you, by separate correspondence, an executed Funding Agreement. The agreement has been amended to address CMTBC's concerns, but provides for secure, stable funding over the three-year period proposed by CMTCA. If CMTCA executes this agreement, both funding and CMTCA operations in BC can commence (or resume) in January 2020.

We look forward to your response.

Yours truly,



Eric Wredenhagen | Registrar & CEO

c.c. July 29, 2019 CMTBC Stakeholders Group