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Jim Browne
Coordinator
Task Group for Counselling Certification
care of
#109 – 15550 – 26th Avenue
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Dear Jim:

Subject: Comparison of Task Group organization proposals re: initial registration process for the new College of Counselling Therapists.

At the June 13th meeting of the Task Group for Counsellor Certification, you had asked that each organization prepare proposals concerning the initial registration of counselling therapists by the anticipated College of Counselling Therapists of BC and related activities over the first five years of the College's operation. You have asked me to review the four proposals that you have received to date from the Task Group organizations and compare them to each other.

I have reviewed the following proposals:

- *Phase-in Model for Membership in the College of Counsellors – AAPC Recommendations* (American Association of Pastoral Counsellors, from M. Nel, faxed August 31, 2001);
- *Submission re: Developmental Model* (Music Therapists Association of BC, from S. Summers et al, email August 18, 2001);
- *College of Counselling Therapists Proposal* (BC Association of Marriage and Family Therapists, from J. Banmen et al, August 30, 2001);
- *Proposal for the Initial Registration of Counselling Therapists by the College of Counselling Therapists of BC* (BC Association of Clinical Counsellors, from J. Browne et al, September 21, 2001).

For the purpose of this comparison, I will refer to these proposals by the initials of the member organization; e.g. AAPC proposal, etc.

Enclosed is a chart that summarizes a comparison of the four proposals. This chart shows a series of questions that I have used in my analysis, which I believe help illustrate the common and unique

features of these proposals. These questions are derived in part from the questions for discussion that I had originally set out in a May 15th discussion paper for the Task Group, titled: *Entry Requirements for a College of Counsellors*. That paper was, in turn, based on earlier submissions and documents that had been reviewed or approved by the Task Group.

The following are my general observations flowing from the comparison of the four proposals.

1. Only the BCACC proposal expressly adopts the two-tier registration model first proposed by the Task Group in its November 1998 *Joint Response*. (This model would establish a generalist, entry-level registration class, with other classes of specialized registration for advanced practice.) The AAPC and MTABC proposals appear to adopt this model, but they did not state that position clearly.
2. The BCAMFT proposal sets out a new registration model that was not previously discussed within the Task Group. They propose a time-limited, provisional registration model wherein registrants who do not hold a master's degree would have a limited period of time to complete a master's degree to obtain full registration. This proposal therefore appears to be a rejection of the two-tier registration model.
3. Only the BCACC proposal notes that the registration criteria must be set out in the College's bylaws, and that government will have a major role to play in approving those bylaws. (As an aside, the government's bylaw-approval authority provides a method for the Ministry to ensure the concerns of the Health Professions Council are reflected appropriately in the College's registration bylaws.)
4. Two of the proposals discuss general registration requirements, and all four address the specific issue of a training or educational requirement (see next). The BCACC proposal provides the most detail on the general admission requirements.
5. The competency-based model that was also discussed in the *Joint Response* is mentioned briefly in the AAPC proposal, but is discussed in more detail in the BCACC proposal. Neither the BCAMFT nor the MTABC proposals consider this feature of the 1998 model.
6. There is little discussion or analysis of the differences between the porting and the standard registration processes in any of the proposals, except in the BCACC proposal.
7. The AAPC, BCAMFT and MTABC proposals each move directly to requiring a particular university degree as an entry requirement for both porting and standard registration. The AAPC identify a bachelor degree, and the BCAMFT and MTABC identify a master's level degree.
8. Only the BCACC proposal takes a different approach for both porting and standard registration. The Association proposes that the minimum competencies for safe and ethical counselling practice (within the scope of practice as defined in the regulation) need to be first articulated. These competencies would be detailed by domain and level, for both general and specialist registrants. Those competencies would then be applied to both the porting and the standard registration processes.
9. Each proposal takes a different approach with respect to the porting requirements, which can be set out in a spectrum.
 - The BCACC starts with an articulation of the core competencies for generalist or specialist registration, and then puts the onus on the Task Group organizations to screen their members

for recommended registration with the new College.

- The AAPC proposal also has the current organizations playing a direct role in porting, but focuses on good standing, a bachelor degree and five years of counselling experience.
 - The MTABC proposal discusses the need for the College to be flexible in setting the criteria re: creative art therapies, but it does not go further.
 - As noted above, the BCAMFT presents a new model for porting; i.e. time-limited provisional registration.
10. Again, the AAPC, BCAMFT and MTABC proposals focus on a particular university degree as the academic entry requirement for the standard registration process. The BCACC proposal uses the competency-based model, explaining that the identified competencies can be used to prepare a table of specifications which can lead to the drafting of questions for an examination process (written and/or oral-practical). The Association also notes that a national examination could be used as an alternative.
11. Each proposal mentions accreditation as part of a registration process, but this was not a major theme developed in any proposal. Two proposals can be contrasted.
- The AAPC proposal states that the College should not accredit *per se*, but should consult with the academic institutions.
 - The BCACC proposal would give the College the option of establishing an accreditation process, noting that the detailed list of core competencies could be used to prepare the accreditation standards.
12. Only the BCACC proposal sets out a time frame for the completion of specific steps that were discussed in its proposal. The MTABC proposal lists a range of activities that it felt needed to be completed over a five-year period, but no specific sequence or timeframe was offered.

In summary, there is little common ground across the four proposals. Given these differences, it is my recommendation that all four proposals be circulated to the full Task Group, along with a copy of this commentary and the comparison table. A meeting of the Task Group should then be called, with or without the participation of the educational program representatives. The purpose of this meeting would be to try to achieve some agreement on a general framework for the initial registration process.

I would suggest that the questions posed in the May 15th discussion paper could be used as a foundation for this meeting, or the questions set out in the first column of the comparison table could be adopted for that purpose. Or one proposal could be selected (e.g. the BCACC proposal) and used as the basis for further discussions. Regardless, it is clear to me that some sort of consensus must emerge if the Task Group wants to submit a meaningful proposal to the first board of the new College regarding the initial registration process for the first years of operation.

As always, I would be pleased to participate in any planned discussions within the Task Group on this important topic.

Yours sincerely,

George K. Bryce