



College of
**Dental Hygienists
of Nova Scotia**

202-1597 Bedford Hwy
Bedford, NS B4A 1E7

T. 902.444.7241
www.cdhns.ca

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Written submission from the CDHNS

Via Email: Legc.office@novascotia.ca

Public Bills Committee
Office of the Legislative Counsel
CIBC Building
802-1809 Barrington Street
PO Box 1116
Halifax, Nova Scotia B3J 2X1

Dear Members of the Standing Committee on Public Bills:

RE: *Bill 36 - Free Trade and Mobility within Canada Act*

I am writing this letter in my role as the Registrar for the College of Dental Hygienists of Nova Scotia, or CDHNS, which is the professional regulatory body for the dental hygiene profession in Nova Scotia. We were established pursuant to the Dental Hygienists Act on May 15, 2009, soon to migrate to the new *Regulated Health Professions Act* (RHPA), at which time, we will be amalgamating with two other oral health professions — denturism and dental technology.

As a regulator, it is our legislated responsibility to serve and protect the public interest in the practice of dental hygiene and to ensure that Nova Scotians receive safe, effective care from competent and ethical dental hygienists. And it is from that lens that I write this letter to you today.

The CDHNS is also part of the 22 members of the Regulated Health Professions Network of Nova Scotia (the Network). I am aware that the Executive Director of the Network will be speaking on behalf of all members of the Network about Bill 36 to the Standing Committee on Public Bills on Wednesday, March 19, 2025.

I also serve as the current Chair for the Network. As the Network Chair, and the CDHNS Registrar, I was grateful for the recent opportunity for Premier Houston to hear the collective concerns of the Network regarding Bill 36 as it is currently drafted. Since that communication, it is my understanding that amendments will be introduced to Bill 36 so that it does not take precedence over the *Patient Access to Care Act, SNS 2023, c.3* (PACA) or the new RHPA.

As a regulatory body, the CDHNS wholly endorses these proposed amendments to Bill 36. I wanted to take an opportunity to summarize our understanding of the proposed changes and the initial concerns.

(1) Labour mobility under PACA

The CDHNS is fully supportive of enhancing labour mobility for healthcare professionals, including dental hygienists, denturists, and dental technologists. We welcomed the opportunity to work collaboratively with the government, and other stakeholders, to explore other mechanisms to improve access to care. Indeed, following the passage of PACA, the CDHNS implemented registration and licensing processes that were as streamlined as possible, while still ensuring the public interest was protected. We took steps to minimize unnecessary administrative burdens for Canadian Free Trade Agreement (CFTA) applicants. The CDHNS was proud to participate in a “first of its kind” system like PACA that reduced financial burdens and increased the speed at which qualified dental hygienists could serve the people of Nova Scotia.

We believe that PACA adequately balances the need to support labour mobility while also allowing regulators to ensure that only qualified healthcare professionals are licensed to practice in Nova Scotia. It upholds our legislative mandate to protect public safety, which includes verifying that applicants are registered in good standing in their originating jurisdiction, as defined in the PACA Regulations. PACA safeguards the public by requiring healthcare professionals from other provinces and territories to obtain a license before practicing in Nova Scotia. This process ensures that all professionals, regardless of where they were initially licensed, meet the necessary standards of competence, character, and capacity to practice safely and ethically in the province.

(2) Bill 36

The CDHNS is supportive of the intent of Bill 36 and understands the province's desire to reduce interprovincial and interterritorial barriers to trade in goods, services, and investment.

Before learning about the proposed amendments, the CDHNS shared the concerns of other Network members, that Bill 36, as originally written, might unintentionally disrupt the strong labour mobility framework that has been established under PACA. Our main concern was that, unlike PACA, Bill 36 does not require healthcare professionals from other Canadian jurisdictions to obtain a license before practicing in Nova Scotia. This would limit the ability of regulatory bodies, like ours, to oversee these professionals, raising several public interest concerns, such as:


- Having no regulatory oversight over who is practising in the province at any given time, making it very difficult for clients to know how to submit a complaint, if needed, which is counter to the recommendations in the Mass Casualty Commission's report.
- Being unable to investigate and resolve complaints from the public against out-of-province healthcare professionals practising in Nova Scotia.
- Healthcare professionals practising in Nova Scotia without professional liability insurance.
- Healthcare professionals practising in Nova Scotia without an adequate understanding of province-specific jurisprudence principles (i.e., how to practice the profession within the provincial legislated requirements and Standards of Practice).

However, based on our understanding, the proposed amendments to Bill 36 effectively and fully address these concerns.

In conclusion, the CDHNS believes that the parameters already in place through PACA effectively achieve the labour mobility goals of Bill 36 while ensuring regulators can continue to serve and protect the public interest.

We appreciate the Premier's willingness to hear, and act on, the concerns of regulated health professions and thank the Government for its commitment to maintaining PACA as the labour mobility framework for healthcare professionals from other Canadian jurisdictions seeking to practice in Nova Scotia.

Sincerely,



Stacy Bryan, RDH, MA Lead
CDHNS Registrar

C: Jennifer Hemeon, Executive Director, Network
Kayla Leary-Pinch, CDHNS Chair