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Notice on Point Injection Therapy (PIT)

(Originally Published as "Announcement" on the CTCMA Website on December 4, 2020)

This notice addresses the issue of whether point injection therapy ("PIT") and related injection therapies fall within the scope of practice of CTCMA registrants.

Background

In 2008, the Board established a PIT Task Force to study the alignment of PIT within the provisions of the *Health Professions Act (the "Act")*. The Board concluded at that time that PIT practices were not authorized by the *Traditional Chinese Medicine Practitioners and Acupuncturists Regulation (the "Regulation")* and, in fact, appeared to be restricted activities under the *Act*.

On September 12, 2009, the College Board passed the following resolution that was released to College registrants:

That the 'Restricted activities' as listed in the Traditional Chinese Medicine Practitioners and Acupuncturists Regulation does not currently include intra-articular injection including synovial fluid replacement therapy/prolotherapy; mesotherapy/injection lipolysis; or intravenous therapy including intravenous injection, infusion; or nerve blocks of any type. A CTCMA registrant may practice such procedures only if the registrant holds current dual registration with a second College whose Regulations do include such 'Restricted activities'.

Not long after this resolution, the Board authorized the work necessary to propose amendments to the *Regulation*. The Board's resolution stated:

That CTCMA seek a new regulation with respect to restricted activities and/or amendments to ss. 1 and 4-6 of the [Regulation] pursuant to section 55(1) of the [Act] with respect to restricted activities and changes to the Schedules.

In July 2015, the College proposed an amendment to the *Regulation*, noting that the gap between the current scope of practice and the legal authorization for restricted activities under the *Act* was an urgent matter with respect to protecting the public interest. The primary goal of the Regulation Amendment Proposal was to ensure that the College continues to be able to effectively regulate TCM practitioners with respect to public protection. The College proposed the expansion of TCM restricted activities that would allow registrants to administer, among other things, "a substance by injection for the purposes of traditional Chinese medicine therapy, including Point Injection Therapy".

The proposal submitted by the College has been filed with the Ministry of Health for consideration.

The College's Position on PIT

Given the fact that amendments to the *Regulations* have not yet been made, the College Board reaffirmed the position that PIT and other injectable therapies are not included in the scope of practice of College registrants and that these treatments are therefore unauthorized by the current *Regulations*.

Without such an amendment, administering injectables is not within scope of practice for traditional Chinese medicine practitioners and acupuncturists in British Columbia. As such, the College must enforce the scope of practice set out by the Minister of Health under sections 1 and 4 of the *Regulation*.

An acupuncturist may practise acupuncture, including:

- a) the use of traditional Chinese medicine diagnostic techniques, and
- b) the recommendation of dietary guidelines or therapeutic exercise.

"acupuncture" means an act of stimulation, by means of needles, of specific sites on the skin, mucous membranes or subcutaneous tissues of the human body to promote, maintain, restore or improve health, to prevent a disorder, imbalance or disease or to alleviate pain and includes:

- a) the administration of manual, mechanical, thermal and electrical stimulation of acupuncture needles,
- b) the use of laser acupuncture, magnetic therapy or acupressure, and
- c) moxibustion (Jiu) and suction cup (Ba Guan);

A traditional Chinese medicine practitioner may practise traditional Chinese medicine. "traditional Chinese medicine" means the promotion, maintenance and restoration of health and prevention of a disorder, imbalance or disease based on traditional Chinese medicine theory by utilization of the primary therapies of

- a) Chinese acupuncture (Zhen), moxibustion (Jiu) and suction cup (Ba Guan),
- b) Chinese manipulative therapy (Tui Na),
- c) Chinese energy control therapy (Qi Gong),
- d) Chinese rehabilitation exercises such as Chinese shadow boxing (Tai Ji Quan), and
- e) prescribing, compounding or dispensing Chinese herbal formulae (Zhong Yao Chu Fang) and Chinese food cure recipes (Shi Liao);



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关于穴位注射疗法(PIT)的通知

(原文发表于 2020 年 12 月 4 日卑诗省中医针灸管理局公告)

中文翻译仅供参考, 如与英文文意有出入, 则以英文版本为准。

本通知讨论穴位注射或与其相关的注射疗法是否属于管理局注册成员的执业范围。

背景

2008 年,管理局理事会成立穴位注射疗法工作小组,研究穴位注射疗法是否符合本省医疗专业法的条款。 当时理事会认定,穴位注射疗法不在中医师及针灸师规定的授权范围内,而且属于医疗专业法的受限医疗 行为类别。

2009年9月12日,管理局理事会通过下列决议,并通告所有注册成员:

列在中医师及针灸师规定中的"受限医疗行为"目前不包括生理滑液补充疗法、增生注射、中胚层疗法、注射溶脂等关节内注射疗法,也不包括静脉注射、静脉输注、神经阻滞等静脉注射疗法。管理局注册成员可以进行注射疗法的唯一前提是同时拥有另一个医疗专业管理局注册成员的资格,而且该医疗专业的相关规定允许注射疗法这种受限医疗行为。

这项决议通过后不久, 理事会授权相关工作以准备修正中医师及针灸师规定。理事会的决议如下:

管理局遵循医疗专业法第 55(1)条有关受限医疗行为与修订附件的规定, 谨此要求在中医师及针灸师规定中加入一条有关受限医疗行为的新规定,并修订 ss.1 与第 4 至 6 条。

2015 年 7 月,有鉴于当时中医针灸师执业范围与医疗专业法对受限医疗行为的授权两者间有一定的落差,管理局认定为紧急事宜,因此提议修订中医师及针灸师规定,以尽到保护大众的职责。中医师及针灸师规定修订提议的主要目标是确保管理局能够持续有效规范中医针灸执业人员,因此建议扩大中医受限医疗行为的范畴,以便修订后的规定允许注册成员以中医治疗目的为前提,进行物质注射治疗,其中包括穴位注射疗法。

管理局的提议已经提交省份卫生厅,有待主管单位考虑。

管理局对于穴位注射疗法的立场

由于中医师及针灸师规定的修订案尚未通过,因此管理局理事会谨此再次重申立场,所有穴位注射和其他注射疗法目前都不在管理局注册成员的执业范围内,也不在中医师及针灸师规定授权的疗法中。

在修订案通过之前,卑诗省的中医师与针灸师都不得给与患者任何注射治疗,此外,管理局也必须确保注册成员遵守卫生厅通过中医师及针灸师规定第1部分与第4部分所授权的执业范畴。

针灸师除了进行针灸治疗外,其执业范畴也包括:

- a) 使用传统中医诊断技法;
- b) 推荐适当饮食或运动疗法。

"针灸"的定义是通过毫针刺激人体皮下或粘膜下组织,以达到改善、恢复或维系健康的目的,并进一步预防失调或减缓疼痛。针灸疗法包括:

- a) 以人工、机械、导热或通电等方式刺激毫针;
- b) 使用激光镭射针灸、电磁疗法或指压疗法;
- c) 灸疗与拔罐

传统中医执业人员可以进行传统中医疗法。

"传统中医"是指根据传统中医理论,利用下列疗法来增进、维系、恢复与预防健康失调或治疗疾病:

- a) 针、灸、拔罐;
- b) 中医推拿;
- c) 中式气功;
- d) 中式复健运动,例如:太极拳;
- e) 开立处方并配置中草药以及食疗。



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關於穴位注射療法(PIT)的通知

(原文發表於 2020 年 12 月 4 日卑詩省中醫針灸管理局公告)

中文翻譯僅供參考,如與英文文意有出入,則以英文版本為准。

本通知討論穴位注射或與其相關的注射療法是否屬於管理局註冊成員的執業範圍。

背景

2008 年,管理局理事會成立穴位注射療法工作小組,研究穴位注射療法是否符合本省醫療專業法的條款。當時理事會認定,穴位注射療法不在中醫師及針灸師規定的授權範圍內,而且屬於醫療專業法的受限醫療行為類別。

2009年9月12日,管理局理事會通過下列決議,並通告所有註冊成員:

列在中醫師及針灸師規定中的"受限醫療行為"目前不包括生理滑液補充療法、增生注射、中胚層療法、注射溶脂等關節內注射療法,也不包括靜脈注射、靜脈輸注、神經阻滯等靜脈注射療法。管理局註冊成員可以進行注射療法的唯一前提是同時擁有另一個醫療專業管理局註冊成員的資格,而且該醫療專業的相關規定允許注射療法這種受限醫療行為。

這項決議通過後不久,理事會授權相關工作以準備修正中醫師及針灸師規定。理事會的決議如下:

管理局遵循醫療專業法第 55(1)條有關受限醫療行為與修訂附件的規定, 謹此要求在中醫師及針灸師規定中加入一條有關受限醫療行為的新規定,並修訂 ss.1 與第 4 至 6 條。

2015年7月,有鑒於當時中醫針灸師執業範圍與醫療專業法對受限醫療行為的授權兩者間有一定的落差,管理局認定為緊急事宜,因此提議修訂中醫師及針灸師規定,以盡到保護大眾的職責。中醫師及針灸師規定修訂提議的主要目標是確保管理局能夠持續有效規範中醫針灸執業人員,因此建議擴大中醫受限醫療行為的範疇,以便修訂後的規定允許註冊成員以中醫治療目的為前提,進行物質注射治療,其中包括穴位注射療法。

管理局的提議已經提交省份衛生廳, 有待主管單位考慮。

管理局對於穴位注射療法的立場

由於中醫師及針灸師規定的修訂案尚未通過,因此管理局理事會謹此再次重申立場,所有穴位注射和其他注射療法目前都不在管理局註冊成員的執業範圍內,也不在中醫師及針灸師規定授權的療法中。

在修訂案通過之前,卑詩省的中醫師與針灸師都不得給與患者任何注射治療,此外,管理局也必須確保註冊成員遵守衛生廳通過中醫師及針灸師規定第1部分與第4部分所授權的執業範疇。

針灸師除了進行針灸治療外, 其執業範疇也包括:

- a) 使用傳統中醫診斷技法;
- b) 推薦適當飲食或運動療法。

"針灸"的定義是通過毫針刺激人體皮下或粘膜下組織,以達到改善、恢復或維繫健康的目的,並進一步預防失調或減緩疼痛。針灸療法包括:

- a) 以人工、機械、導熱或通電等方式刺激毫針;
- b) 使用鐳射鐳射針灸、電磁療法或指壓療法;
- c) 灸療與拔罐

傳統中醫執業人員可以進行傳統中醫療法。

"傳統中醫"是指根據傳統中醫理論,利用下列療法來增進、維繫、恢復與預防健康失調或治療疾病:

- a) 針、灸、拔罐;
- b) 中醫推拿;
- c) 中式氣功;
- d) 中式複健運動,例如:太極拳;
- e) 開立處方並配置中草藥以及食療。