

T (604) 742-6563

Toll Free 1-855-742-6563

F (604) 357-1963

E info@ctcma.bc.ca

Practice Guidance - Marketing & Advertising

Marketing and advertising are ways registrants may provide information to the public about the type and availability of services they provide. To help guide registrants in their communications with the public, sections 92 of the College bylaws and 3. (iv) of the Jurisprudence Handbook define and describe the rules registrants should follow when creating marketing and advertising materials.

What is permitted?

When registrants are marketing themselves or their practice, in whichever medium they choose (social media, radio, print, website, etc.) all information should be true (factual & accurate), objectively verifiable, independent of opinion (testimonial-free), comprehensible and professionally appropriate.

Important information such as properly identifying practitioners with their legal names and registration titles, practice information such as office hours and days of operation, contact numbers, languages spoken, location and methods of payment, etc. are acceptable inclusions in advertising. Fees or prices advertised should be represented honestly and accurately and meet a reasonable range for the industry standard.

Practice Note: References to qualifications in advertisements should be consistent with the College's rules. For instance, the title that the registrant can use will depend on their class of registration. For example, a R.TCM. H. cannot use the title of Doctor and, any qualifications earned abroad or elsewhere should be <u>clearly stated</u> (see section on how name and credentials should appear on marketing and advertising materials, below).

What is not permitted?

Advertising materials should not include any information that is misleading, fraudulent, or likely to take advantage of a person's weakened state (physical, mental, or emotional). Misleading information includes the promise or guarantee of results, or an unjustified expectation of result by the recipient, intentionally leaving out relevant information, or including non - relevant, false, or unverifiable information.



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Practice Note: Providing before and after pictures of how one's services can enhance a patient's appearance or 'cure' them of a physical ailment, or that uses comparative language that one or one's clinic is the "best" or better than another registrant's, is misleading and unverifiable and therefore should not be used.

What is fraudulent marketing?

An example of fraudulent marketing or advertising practices would include marketing, selling or incentivizing treatments not covered by 3rd party insurance providers (like non-RMT massage) by offering to provide receipts for treatments or services that are covered (such as acupuncture treatment) when the insurable treatment has not been provided.

Can I advertise an area of specialty?

While it is perfectly appropriate to identify a practise focus or a preferred area of practise such as perinatal care, geriatric care, athletics/sports injury care, or women's health as examples, registrants are not permitted to advertise any special accreditation or competency identifying themselves as a "specialist" in any area of practise. ¹

What are the rules regarding the use of professional titles & designations?

Registration titles and definitions for practice class are outlined in depth in the <u>College bylaws</u> under section IV. Registration, starting on page 18.

Page 32 under section 3.B.(iv), Use of titles, <u>Jurisprudence Handbook</u> states that:

- only approved persons can use any form of the title "Doctor" when providing or
 offering to provide health care services in British Columbia. If a person is not
 from one of the approved health professions, he or she cannot use the title in a
 clinical setting even if the person has an earned doctoral degree (i.e., the person
 holds a Ph.D.). Allowing a staff person to call the health care practitioner
 "Doctor" would constitute an offence.
- regulations for each College established under the HPA regulate the use of titles relating to their profession. Each profession has specific titles that only persons

¹ 3. C.(iv) https://www.ctcma.bc.ca/wp-content/uploads/2023/03/media/1063/jurisprudence-handbook-en-web.pdf



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registered with their college can use as a professional title. For example, only practitioners can use the titles "acupuncturist", "traditional Chinese medicine practitioner", "doctor of traditional Chinese medicine" and "traditional Chinese medicine herbalist" under the Traditional Chinese Medicine Practitioners and Acupuncturists Regulation. In addition, even if the person does not use the reserved title, he or she cannot hold himself or herself out as a practitioner. This prevents people from pretending that they are registered to practise TCM and Acupuncture to the public when they are not and hence, engaging in unauthorized practice.

Practice Note: Registrants should not use a professional title that is reserved to registrants of other Colleges. For example, unless a practitioner is registered to practise physical therapy, they cannot call themselves a physiotherapist or a physical therapist.

Who can use the "Doctor of Traditional Chinese Medicine" (Dr. TCM) class title in their marketing/advertising materials?

Each College established under the HPA regulate the use of titles relating to their profession. Each profession has specific titles that only persons registered with their college can use as a professional title. Under s.3 of the Traditional Chinese Medicine Practitioners and Acupuncturists Regulation ("TCMPA Regulation"). DTCM and D.T.C.M. are official marks of the College. Only those who are registered as Dr. TCM. are entitled to use Dr. TCM., as their title. No academic or training institution has the authority to grant the use of Dr. TCM. In BC. To avoid confusion, registrants who hold Ph. D. or other credentials should clearly state these separately.

Example:

CLEAR:	UNCLEAR:
Xiaoping Li, R.TCM.P.	Dr. Xiaoping Li, MD., Ph.D., R.TCM.P.
M.D (China), Ph.D. Acupuncture & Tuina (China)	
CLEAR:	UNCLEAR:
Dr. Caitlin Jones (Cat Jones), R.TCM.H.	Cat Jones, DTCM, R.TCM.H.
Graduate DTCM Diploma Program (School/Country)	



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How should my name, title and credentials appear on marketing or advertising materials?

In addition to listing the appropriate registration title, registrants are required to use their <u>legal name</u> on all promotional materials, including billing invoices. A registrant who uses or wishes to include any additional or commonly used names (i.e., English names), they should include them in brackets <u>beside their legal name</u>. Commonly used names may be included either at the end of their full name or inserted as part of their full name.

Α.

CLEAR:	UNCLEAR:
Xiaoping (Danny) Li, R.TCM.P.	Dr. Xiaoping Li, MD., Ph.D., R.TCM.P.
M.D (China), Ph.D. Acupuncture & Tuina	
(China)	
OR	
Xiaoping Li (Danny), R.TCM.P.	

В.

CLEAR:	UNCLEAR:
Caitlin Jones (Cat Jones), R.TCM.H.	Cat Jones, DTCM, R.TCM.H.
Graduate DTCM Diploma Program	
(School/Country)	

College bylaws state that registrants who are registered as non-practising may identify themselves by registration title ONLY when accompanied by the "non-practising" status. Similarly, registrants who have been granted temporary registration should clearly state this to avoid confusion to the public.

Α.

CLEAR:	UNCLEAR:
Dr. Amy Wong, Dr. TCM. (Non-Practising)	Dr. Amy Wong, Dr. TCM.
OR	
Dr. Amy Wong, Dr. TCM. (temporary	
registration)	

NOTE: Former registrants who are no longer registered or who have had their registration cancelled, are not permitted to use any registration title granted by the College.



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Any credential or designation that could be interpreted as a specialization may not be included as part of a registrant's practice title. Instead, credentials which refer to training in a specific area or area of special interest may be included as part of a registrant's biography.

Α.

CLEAR:

Dr. Jenny Smith, Dr. TCM is a women's health focused doctor of traditional Chinese medicine. She has been awarded the status as Fellow by the ABORM (Acupuncture & TCM Board of Reproductive Medicine).

UNCLEAR:

Dr. Jenny Smith, Dr. TCM, FABORM (FABORM is not a registration title, and could be misunderstood as a specialty).

Practice Note: Appropriate name, registration class title and credential use are important factors in maintaining public trust and promoting oneself accurately and reliably. Additionally, because all practising registrants are listed on the College registry by their legal names, the accuracy of name and title are imperative for members of the public and third-party insurance companies to verify or confirm practitioner registration.

Useful links and resources:

https://www.ctcma.bc.ca/wp-content/uploads/2023/03/media/1063/jurisprudence-handbooken-web.pdf

https://www.ctcma.bc.ca/wp-content/uploads/2023/07/ctcma-bylaws-and-schedules.pdf

https://cnpbc.bc.ca/wp-content/uploads/Practice-Standard-Advertising-and-Communication-with-the-Public-FINAL.pdf