



To protect the public, Ontario's paramedics and EMS are highly regulated.

One more layer of regulation – a private college for paramedics threatens to muddy direct public accountability.

CUPE paramedics have raised concerns about the proposed

regulatory college for paramedics now being considered by the Health Professions Regulatory Advisory Committee (HPRAC).

The submission by proponents of college regulation to HPRAC reveals even more serious issues:

A radical increase in the number of people defined as paramedics. Currently paramedics are defined by the *Ambulance Act* as a person with the necessary qualifications who works or volunteers for an ambulance service. The proposal is to remove the requirement that paramedics work or volunteer with ambulance services.

Employment with ambulance services: In the last ten years, governments and employers have moved significant parts of our work to for-profit, non-ambulance providers. Opening the paramedic designation to those who work for those outside of EMS will also open the door to moving more of our work to such employers. With our employers suffering from government funding cuts, we can anticipate renewed attempts to move paramedic work to lower cost providers, like the for-profit companies that currently provide patient transfers. The change in the definition of paramedics may also give new life to proposals to move our work to fire departments.

Downward pressure on wages: While we believe that patient transfer staff should be well paid and unionized, unfortunately the reality is very different. The private sector employers pay a small fraction of what unionized ambulance providers pay. Even with this, one patient transfer employer recently declared bankruptcy citing union wages. Proponents of college regulation estimate that 3,000 "paramedics" work in the patient transport industry. This would be an increase of almost 50% in the number of paramedics and put significant downward pressure on our wages.

These concerns are in addition to:

Extra costs. New costs that would be imposed by the college on paramedics are now costed at \$500 per year (plus unspecified initiation fees) by the group backing the college. This is at the high end of what was anticipated. Up until now, the entire costs of paramedic discipline are paid by the employers, the Ministry of Health and LTC, and Base Hospitals. Other new costs include insurance to help pay for the costs associated with college imposed disciplinary procedures. The proposal would download these new costs onto paramedics.

One more bureaucratic layer to fire and discipline paramedics?

While those advocating for the college hope for regulation *only* by the new college, it is, in fact, not clear that others bodies will relinquish their powers. It is clear that employers will not back off from their disciplinary powers and that neither the Ministry nor the Base Hospitals have promised to back off their disciplinary powers. We may end up with more bureaucratic bodies with powers to remove us from our profession. Double jeopardy is a real threat. Unfortunately, the questionnaire circulated by advocates of the college suggested that self-regulation will result from the establishment of a regulatory college. This is far from certain.