



March 15, 2022

VIA EMAIL

Ms. Lisa LaPointe
Chief Coroner
BC Coroners Service
4720 Kingsway
Burnaby, BC V5H 4N2

Via email: Lisa.Lapointe@gov.bc.ca

Dear Ms. LaPointe:

Re: BC Coroners Service Death Review Panel: A Review of Illicit Drug Toxicity Deaths

We write in response to the recently released BC Coroners Service Death Review Panel report and offer our sincere thanks to Mr. Michael Egilson for chairing this important panel.

The report, *A Review of Illicit Drug Toxicity Deaths*, concisely and frankly describes the crisis that exists in BC and offers many actionable and tangible recommendations, which we will amplify with registrants through our electronic communications channels.

We want to respond to recommendation 3 (C), which was directed to our respective colleges. It states: *the Ministry of Health and the Ministry of Mental Health and Addictions, in partnership with the Doctors of BC, the College of Physicians and Surgeons of BC and the BC College of Nurses and Midwives, will develop a practice standard to support health care providers and prescribers within emergency departments, hospitals and community settings to assess, screen and diagnose patients for substance use disorders, and develop referral mechanisms to link patients to evidence-based services.*

As the regulators of 80,000 health care practitioners, physicians, surgeons, nurses, and midwives, we have a statutory duty to serve and protect the public. Part of that duty requires us to establish, monitor and enforce practice standards to enhance the quality of care provided, and reduce incompetent or unethical behaviour among registrants.

Unlike clinical standards, regulatory practice standards address aspects of a health care professional's work such as the requirement for documenting, retaining records, and avoiding real or perceived conflict of interest. Regulators do not create standards that address clinical decisions such as which test to order or which drug to prescribe.

We have neither the expertise nor the authority to develop clinical standards and guidelines and would defer to expert medical societies, organizations, and other entities to guide this work, which we often reference in our quality assurance activities or inquiry investigations.

With great respect, we suggest that the BC Center for Substance Use or other similar expert body be tasked with developing clinical practice standards to screen, assess, and diagnose patients for substance use disorders, as well as mechanisms for linking patients to services.

We fully support the calls to action from the Ministry of Health and the Ministry of Mental Health and Addictions to seek out clinical innovations and novel approaches to care for those with substance use disorders while ensuring public safety. If there are other specific requests or recommendations that align with our mandate and role as regulators, we would be pleased to engage in further discussion with you.

Yours sincerely,



Heidi M. Oetter, MD
Registrar and CEO
College of Physicians and Surgeons of BC



Cynthia Johansen, MAL, MSc
Registrar and CEO
BC College of Nurses and Midwives