

ADVISORY STATEMENT



B.C. Provincial Health Officer Order SARS-CoV-2 Swabbing

Occupational therapists practice within the scope of the profession, with knowledge of, and adherence to, national and provincial legislation, regulations, standards of practice and policies relevant to the practice of occupational therapy — COTBC Code of Ethics (p. 4)

Purpose

This advisory statement provides an overview and regulatory considerations related to the [Health Authority Regulated Health Professional SARS-CoV-2 Swabbing Order](#) issued by B.C.'s Provincial Health Officer on November 16th, 2020. The Order is in effect until the date the Provincial Health Officer provides notice that the COVID-19 regional emergency has passed.

SARS-CoV-2 Swabbing during the COVID-19 Public Health Emergency

Background

Performing a throat swab (described as the “Screening Activity” in the Order) to test for COVID-19 requires a restricted activity established in health profession regulations under the *Health Professions Act*. Specifically, it includes “put[ting] an instrument or a device, hand or finger beyond the point in the nasal passages where they normally narrow” (an activity required to perform a nasopharyngeal swab) and “put[ting] an instrument or a device, hand or finger beyond the pharynx” (refer to (2)(g)(iii) of the B.C. Ministry of Health’s [restricted activity listing](#)).

Per the Order, the Provincial Health Officer is of the opinion that this restricted activity currently “adversely affects the timely delivery of the Screening Activity, and the efficient and effective use of health human resources, throughout British Columbia” (p.1).

As such, the Order authorizes specific regulated health professionals who do not complete this activity as part of their regular scope of practice (e.g., occupational therapists) to temporarily perform the Screening Activity if they meet certain requirements outlined in the Order.

Employment Requirements

The Order only applies to specific regulated health professionals who are employed by:

- a. A health care body as defined in the [Freedom of Information and Protection of Privacy Act](#),
- b. Provincial Health Services Authority, or
- c. First Nations Health Authority.

Occupational therapists who are not employed by a health authority or defined health care body cannot perform the Screening Activity.

Training and Competency Assessment Requirements

Occupational therapists who are employed by the above listed health authorities or health care bodies may be asked to perform the Screening Activity for COVID-19 testing as a result of this Order. Specific conditions apply regarding required training, including:

- The Screening Activity must be conducted in accordance with the guidelines issued by the BC Centre for Disease Control (the “**Guidelines**”), posted at the following website:
<http://www.bccdc.ca/health-professionals/clinical-resources/covid-19-care/lab-testing>
- Occupational therapists must successfully complete Health Authority training materials and assessments that include or are based on Elsevier Clinical Skills. “Specimen Collection: Nose and Throat – CE” published by Elsevier.
- Occupational therapists must have their competence to perform the Screening Activity assessed and verified by someone who is authorized to do so by the Health Authority. This is to ensure they can demonstrate knowledge in accordance with the BCCDC Guidelines, respecting who to test, specimen collection and labelling, and the use of personal protective equipment. Occupational therapists are not qualified to assess the competency of each other and/or other designated health professionals to complete the Screening Activity.

Occupational therapists are accountable for their practice, including if they are asked to perform the Screening Activity for COVID-19 testing as part of redeployed job responsibilities. Any occupational therapist involved in this activity should directly review the Order, ensure they have received all required training and verify they have the necessary knowledge, skills and attitudes required to provide the Screening Activity safely, ethically and competently.

Monitoring the Legislative and Regulatory Landscape

Given the evolving nature of the COVID-19 pandemic, occupational therapists involved in providing SARS-CoV-2 swabbing are responsible for maintaining their competence to perform the Screening Activity while the Order is in effect and should ensure they regularly review legislative or regulatory information applicable to this temporary area of practice. If registrants have questions about the implementation of this service and whether they are eligible to provide it, they should connect with the appropriate COVID-19 testing department/program for their health care body/authority.

References

- British Columbia Ministry of Health. (2020). *Health Authority Regulated Health Professional SARS-CoV-2 Swabbing Order*.
<https://cotbc.org/wp-content/uploads/PHO-Testing-Order-HA-Regulated-Health-Professionals-Nov-16.pdf>
- Freedom of Information and Protection of Privacy Act (FIPPA), Revised Statutes of British Columbia (1996).
https://www.bclaws.ca/civix/document/id/complete/statreg/96165_00
- Health Professions Act, Revised Statutes of British Columbia (1996).
https://www.bclaws.ca/civix/document/id/complete/statreg/96183_01