



File #: 60100-30/PCU/1213PCU0003

SEP 16 2013

Dr. Bohdan J. Bilan
Vice President, Academics and Regulatory Affairs
EMINATA Group
Commerce Place, 1800-400 Burrard St
Vancouver BC V6C 3A6

Dear Dr. Bilan:

Thank you for your letter of August 28, 2013 (attached) regarding the PCU College of Holistic Medicine (PCU College) application for a Bachelor of Traditional Chinese Medicine (TCM) (Acupuncture) degree program.

In your letter you express your concerns that the PCU College application will not be moving forward for review by the Degree Quality Assessment Board (DQAB), as outlined in my letter of August 15, 2013 (attached), and you request a meeting with representatives of the Ministry of Advanced Education and Ministry of Health to further discuss these matters.

We would be pleased to meet with you as requested to discuss the PCU College proposal and the issues you have raised. My staff will be in touch with you shortly to arrange a convenient meeting time and place.

Thank you again for writing. I look forward to meeting with you in the near future.

Sincerely,

Valarie Bakowski
Executive Director

Attachment

pc: Dr. John Yang, Dean/Clinic Director
PCU College of Holistic Medicine

Mr. Daryl K. Beckett, JD
Director, Professional Regulation
Ministry of Health

Ministry of
Advanced Education

Governance and
Quality Assurance
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Mailing Address:
PO Box 9883 Stn Prov Govt
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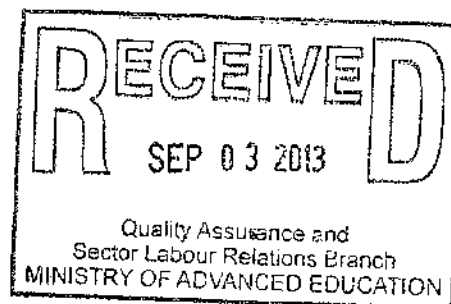
Telephone: (250) 368-5406
Facsimile: (250) 387-3750

bpc: Ms. Dawn Minty, Assistant Deputy Minister
Post-Secondary Regions and Programs Division
Ministry of Advanced Education

Mr. Tony Loughran, Executive Director
Lower Mainland Region
Ministry of Advanced Education

August 28, 2013

Valarie Bakowski
Executive Director, Ministry of Advanced Education
Governance and Quality Assurance Branch
PO Box 9883 Stn Prov Govt
Victoria, BC V8W 9T8



Dear Ms. Bakowski,

Thank you for your letter of August 15th, 2013 regarding the PCU College of Holistic Medicine's (PCU College) application for a Bachelor of Traditional Chinese Medicine (TCM) (Acupuncture) degree program. I appreciate that the quality of our proposal has been duly noted in your response. However, I would like to take this opportunity to outline some of the potentially problematic public policy issues that your decision to not forward our application to the Degree Quality Assessment Board raises.

With respect, we do not understand the commentary from your colleagues at the Ministry of Health (MoH) who indicated that there is no support for an increase in the entry-to-practice credential for TCM from a diploma to a baccalaureate program. We are puzzled by this comment, because, while we are seeking to offer a new degree program, we do not believe that government, through the CTCMA should increase entry to practice requirements. As a result, we fail to understand why the MoH's desire to maintain the current entry-to-practice credentials for those operating acupuncture practices in British Columbia should have any bearing on our desire to respond to the strong demand from individuals who want to expand their TCM learning and skills through a Bachelor of Traditional Chinese Medicine (TCM) (Acupuncture).

We are given pause by your comment that *"As the provincial government is a key employer in health care, these consultations (with the MoH) ensure that the province's current and future health human resource needs are met."* As you know, TCM and acupuncture are considered as supplementary health services by the Medical Services Commission. As such, patients seeking the services of chiropractors, acupuncturists and other supplementary health service providers are primarily responsible for the costs of these services. Though it may have been well intended, we fail to understand why the MoH should be offering an opinion about the future need for health care services, that in the main, it does not pay for.

Finally, we are sincerely trying to reconcile what appears to be contradictory positions offered by your colleagues at the MoH with respect to TCM practitioners seeking degrees. While the MoH appears to support TCM diploma graduates obtaining a Bachelor of Health Science's degree from Thompson Rivers University, it does not support them obtaining a baccalaureate specific to TCM. This apparent contradiction suggests that staff at the MoH do not have a full understanding of the unique nature of TCM and its role and its growing acceptance in British Columbia. This may be because it is not a service that they insure. This may also indicate that staff at the MoH are taking a different view of government's stated policy (as articulated in the Minister of Advanced Education's Mandate Letter of June 10, 2013) that the Minister will *"implement our government's commitment to establish a new School of Traditional Chinese Medicine at a publicly funded BC post-secondary institution."*

While we appreciate that it is sound public policy for government to match the programs provided at public post-secondary institutions with the demands of the marketplace, it our understanding that as a

private post-secondary institution, that responsibility is ours alone. Indeed, if our considerable market research that demonstrates there is a growing demand for both TCM services and those seeking higher levels of education and training in TCM is incorrect, then we alone will bear responsibility for our decisions.

More importantly, we believe that there are some unintended misunderstandings between ourselves, your department, and the MoH, that may have led to your recent decision. We respectfully request the opportunity to discuss our proposal with you and your colleagues at the MoH in person. We feel that such a discussion would greatly enhance our mutual understandings and would provide a way forward that would serve both the government and consumers in need of care.

Thank you again for your letter, we look forward to further discussing these issues with you in person at your earliest convenient opportunity. Your expressed willingness to work with us is appreciated.

Sincerely,

For 

Bohdan J. Bilan PhD
Vice President, Academics and Regulatory Affairs
Eminata Group

cc: Dr. John Yang, Dean/Clinic Director
PCU College of Holistic Medicine



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AUG 15 2013

Dr. Bohdan J. Bilan
Vice President, Academics and Regulatory Affairs
EMINATA Group
Commerce Place, 1800-400 Burrard St
Vancouver BC V6C 3A6

Dear Dr. Bilan:

I am writing in regard to the PCU College of Holistic Medicine (PCU College) application for a Bachelor of Traditional Chinese Medicine (TCM) (Acupuncture) degree program.

As you may know, the Degree Program Review Criteria and Guidelines state that prior to or during the submission process, the Ministry of Advanced Education (the Ministry) will consult with the Ministry of Health (MoH) regarding any new degree programs in the health field. As the provincial government is a key employer in health care, these consultations ensure the province's current and future health human resource needs are met.

For further information on the Ministry's consultation process with the MoH, please see the Degree Program Review Criteria and Guidelines at: <http://www.aved.gov.bc.ca/degree-authorization/documents/degree-program-criteria.pdf>.

The Ministry has consulted MoH regarding the PCU College application for a Bachelor of TCM (Acupuncture). At this time, there is no support for an increase in the entry-to-practice credential for TCM (e.g. from a diploma to a baccalaureate degree).

MoH continues to be supportive of higher learning for the purpose of developing faculty and advancing research. TCM diploma graduates may be interested in pursuing a degree completion program. For example, Thompson Rivers University delivers a Bachelor of Health Sciences designed to provide diploma-prepared health professionals with the opportunity to obtain a bachelor's degree: <http://www.tru.ca/distance/programs/health-science/bachelor-health-science.html>

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As there is no support from the MoH for proceeding with increasing the entry-to-practice credential for TCM at this time, I regret that the PCU College application for a Bachelor of TCM (Acupuncture) will not be proceeding for review by the Degree Quality Assessment Board.

The Ministry appreciates the comprehensive application materials prepared and submitted by PCU College for a Bachelor of TCM (Acupuncture). As the application will not be proceeding, the Ministry will withdraw the degree application from the Post-Secondary Institution Proposal System and refund the application fee of \$3500 to PCU College. Please be assured that the decision to not proceed with the degree application at this time in no way reflects on the quality of the proposal.

Should you have any questions or need further information regarding this letter, please do not hesitate to contact Ms. Dorothy Rogers, Director, Degree Quality Assessment Board Secretariat at DQABSecretariat@gov.bc.ca.

Sincerely,



Valarie Bakowski
Executive Director

pc: Dr. John Yang, Dean/Clinic Director
PCU College of Holistic Medicine

Mr. Daryl K. Beckett, JD
Director, Professional Regulation
Ministry of Health

Degree Quality Assessment Board

bpc: Ms. Dawn Minty, Assistant Deputy Minister
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