

Working in Multiple Regulated and Unregulated Healthcare Roles

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INTRODUCTION

The College of Licensed Practical Nurses and Health Care Aides of Alberta (CLHA) has the **authority** under the *Health Professions Act* (HPA) to carry out its activities and **govern** Health Care Aides (HCAs)* in a manner that protects and serves the public interest.

This info sheet provides information for HCAs who, in addition to their roles as HCAs, work in other roles either as **regulated health professionals** or **unregulated health providers**. It outlines the HCA's responsibilities as well as other key considerations related to working in multiple roles. For questions about other professions, please contact the relevant **regulatory** body directly.

Terms found in the definition section are **bolded** where they appear for the first time in this document.

MULTIPLE PROFESSIONAL REGISTRATIONS

HCAs in Alberta are regulated health professionals under the HPA and are held **accountable** to their standards of practice and Code of Ethics.

Regulated health professionals who hold two or more practice permits to work in different regulated professions are considered to have **multiple professional registrations**. For example, someone may hold an HCA practice permit and a Licensed Practical Nurse (LPN) practice permit at the same time. Professionals with multiple professional registrations must meet the requirements of each regulatory body to ensure public safety and maintain professional standards.

An HCA with multiple professional registrations can only perform the duties within the **scope of practice** for the profession and those specified in their job description when working during a scheduled shift. However, in emergency situations, an HCA with multiple professional registrations may practice to their most applicable scope of practice if there is no other suitable health professional to respond. For example, an HCA, who is also a registered LPN, was on an HCA scheduled shift and noticed their client had fallen and needed help. In this scenario, if a suitable health professional is not available immediately, then the HCA can

* "In this document, "Health Care Aide(s) (HCAs)" has the same meaning as "regulated member(s)" in the *Health Professions Act*".

respond, using their nursing knowledge to assess and provide care to the client within the LPN scope of practice until another **authorized** health professional is available to take over the client's care. The HCA must then document the events and how they responded in an accurate and timely manner. This way, the HCA/LPN ensures the client's protection and safety in an emergency situation.

Key Considerations

An HCA with multiple professional registrations is required to:

- meet the registration requirements for each regulatory body;
- comply with legislative, regulatory, and employer requirements;
- practice under one profession/**designation** per scheduled shift except in emergencies where no other appropriate health professionals are available to respond;
- inform their clients, colleagues, and employers about the role they are working in, including using the appropriate title of that role; and
- ensure the client's health record reflects the role under which the care was provided.

Registration Requirements

It is important to be familiar with the specific registration requirements for each practice permit that the health professional holds. This includes requirements for both new registrations and renewals. CLHA registration requirements apply to all applicants regardless of whether they are also registered under another profession. This includes requirements such as the **Continuing Competency Program, liability insurance, good character**, and other requirements.

Liability Coverage

To register as an HCA in Alberta, the HCA is required to obtain professional liability insurance that meets the minimum requirements established by CLHA Bylaws. When holding multiple practice permits, the HCA must provide the CLHA with evidence of professional liability insurance that covers HCA practice to ensure the HCA is covered while working within the HCA scope of practice. Typically, the HCA insurance policy will only cover the HCA when they are working within the scope of practice of an HCA. HCAs are **responsible** for ensuring they have the appropriate liability insurance for all the professional roles they hold.

For more information, please refer to the *Actively Engaged Requirements for Registration* and the *Declarations and Registration Requirements* policies or contact the Registration Department.

Conduct Complaints

If a **complaint** is filed against the HCA with multiple professional registrations, the HCA has a duty to report the complaint to all regulatory bodies with which they are registered.

- If the complaint relates to the HCA scope of practice, it will be handled by CLHA. In this case, the HCA will be held to the level of accountability, skill, and education of the HCA profession.
- If the HCA was acting in a different capacity when the incident occurred, the CLHA still has jurisdiction with respect to the HCA's conduct. However, the initial investigation may be conducted by the other regulatory body with which they are registered, and the CLHA will, in many cases, determine what steps to take under its own process after the **proceedings** have been concluded.
- If another regulatory college handles the complaint, the HCA must still report the **status** of those proceedings and the outcome to the CLHA.

For more information, please contact the Conduct Department at complaints@clha.com.

Accountability

HCAs are responsible and accountable for their practice and conduct under all the regulatory bodies they are registered with, regardless of their role. HCAs are, therefore, expected to follow the legislative, regulatory, and employer requirements related to all practice permits they hold. For example, an HCA who is working in an HCA role (but who is also registered as an LPN) will require supervision for any activity that HCAs require supervision to perform, even if they are authorized and competent as an LPN to perform the activity without supervision.

As responsible and accountable professionals, HCAs must understand how meeting the requirements of multiple professional registrations impacts their workload, **fitness to practice**, and relationships with clients and **colleagues** and take steps to address these issues.

Role Confusion

Role confusion may occur due to holding multiple roles within one facility, which can negatively impact client care and relationships with colleagues. When health professionals work in multiple roles, it might be difficult for clients or staff to know what role they are working in at any given time. Clients might not understand why a health professional can offer a certain professional service sometimes but not at other times.

HCAs should ensure that clients and colleagues understand the HCA's roles and responsibilities each shift by means such as communicating their current role, using the appropriate title, documenting correctly, and following any relevant employer requirements. This helps reduce

confusion about which duties they can and cannot perform under that given role. HCAs should also clarify their roles and responsibilities with their employer or potential employers and be aware of any potential **conflict of interest** that may arise from working under multiple designations.

WORKING AS A REGULATED HEALTH PROFESSIONAL AND AN UNREGULATED HEALTH PROVIDER

An HCA who also works as an unregulated health provider may only perform the duties outlined in their regulated scope of practice and/or job description for the scheduled shift. In such cases, the HCA must be aware of their obligations and accountabilities and follow employer requirements to ensure that they practice safely, competently, and ethically. For example, if an HCA is working as a comfort care aide (CCA), they are not allowed to insert a suppository for a client when on a CCA scheduled shift if that activity is outside the role of the CCA, even if they are qualified to do so as an HCA.

However, in emergency situations where an HCA is working as an unregulated health provider, and no other qualified, regulated member is available to assist urgently, the HCA is expected to provide appropriate care using their knowledge, skill, and judgment until another regulated health professional can take over. For example, if on a CCA-scheduled shift, an HCA/CCA finds a client on the edge of the bed and they are about to fall. The HCA/CCA can use their knowledge as an HCA to re-position the client safely back into the bed using appropriate HCA techniques. They can then call an appropriate regulated professional to provide further care and assessment to the client. Additionally, the HCA should record this **near-miss** and report relevant information to the most responsible health professional according to employer requirements.

Even during an emergency, the HCA may only perform tasks that are within their scope of practice, supported by the employer and that the HCA is competent to perform.

Key Considerations

The following are key considerations for HCAs who are also working as an unregulated health provider:

- The HCA, regardless of the role in which they are working, remains responsible and accountable for their practice and conduct. This means they must comply with legislative, regulatory, and employer requirements.
- The HCA must meet all the registration requirements to maintain their HCA practice permit. The hours worked as an unregulated health provider may not count towards their practice hours as an HCA.
- The liability coverage that an HCA is required to have does not cover them when working in an unregulated role unless they are performing duties that are within the HCA's scope of practice.

- The HCA works under one role at a time and within the activities permitted by the job description and/or scope of practice per scheduled shift, except in emergencies where no other appropriate health professionals are available to respond.
- The HCA should clearly specify their role if they work in multiple roles at the same facility. This includes using the correct title for each role, informing clients and colleagues as necessary, and documenting correctly.
- Document according to the expectations of the role and any employer requirements. Please refer to the *Documentation* policy for more information.

Please note that a complaint can be made to the CLHA against an HCA, even though they were working as an unregulated health provider when the incident occurred. Whether the complaint will be looked into or dismissed is determined on a case-by-case basis. If the CLHA looks into the complaint, the HCA's training, skill, and judgement as an HCA will be considered, even though the incident occurred while working as an unregulated health provider.

CONCLUSION

While HCAs may work multiple roles, they need to be aware of regulatory requirements and key considerations. HCAs working in multiple roles should always work within the scope of practice or job description of their scheduled shifts. HCAs may provide care within their scope of practice during emergencies as they have a duty to provide safe, competent, and ethical care to the public.

Documents are updated frequently. For the most current version and access to related documents and resources, please visit the Knowledge Hub on clha.com.

If after reading this document you have questions about its content, please contact the CLHA Professional Practice Team via practice@clha.com, or by phone at 780-484-8886 or 1-800-661-5877 (toll free in Alberta).

DEFINITIONS

Accountable: the ability to explain why actions were taken or not for a task the HCA is responsible for.

Authority: refers to the power or right to give orders, make decisions, and enforce obedience. It can also mean the appropriate person to give orders or make decisions.

Authorized: having legal permission to do something or for something to happen.

Colleague: anyone who works with the HCA.ⁱ This includes other workers, volunteers, students, contractors, or people from a different site.

Complaint: a statement that something is wrong or not good enough. In this document, a complaint refers to a notice that the HCA was involved in **unprofessional conduct**, which may include not following the standards of practice, the code of ethics, or behaviours that harm the **integrity of the profession**.

Conflict of interest: when an HCA's personal (or self-serving) interests are in conflict with the HCA's professional responsibilities.

Continuing Competence Program: a system that supports HCAs to achieve and demonstrate ongoing competence through the completion of learning and practice activities relevant to their job.ⁱⁱ

Designation: a name, description, position, or title that is given and recognized officially.

Fitness to practice: having the physical, mental, and emotional health required to provide safe, competent, and ethical client care.

Good character: a requirement that HCAs demonstrate integrity, honesty, and professionalism. Criminal charges, convictions, or other concerns may contribute to the character.

Govern: to lead, control, or manage an organization or group, often by creating rules and making decisions that guide their actions.

Integrity of the profession: is the public trust built when members of the profession work within their standards of practice and code of ethics.ⁱⁱⁱ

Liability insurance: a type of insurance coverage for individuals who provide professional services that help protect the professional from claims resulting from errors, mistakes, or negligence in the delivery of professional services.

Multiple professional registrations: refers to a situation where a person holds more than one permit to work as a professional. This means they have met the necessary requirements to legally practice in each of those professions.

Near-miss (good catch/close call): an event that could have caused harm or resulted in unwanted consequences but did not because the event was caught and prevented.

Proceedings: events or activities involving a formal procedure such as the events followed to deal with a complaint. Proceedings also refers to the period between the beginning and end of a case. It is the period between making the complaint and reaching the final decision.^{iv}

Regulated health professional: any individual who is a regulated member of a regulatory college.

Regulatory: relating to individuals or organizations responsible for ensuring compliance with laws or rules or managing a particular activity or process. In this document, regulatory mostly refers to CLHA related requirements or processes.

Responsible: to respond and answer for one's actions and duties. Being responsible means that an individual is trustworthy and reliable.^v

Role confusion: not knowing the staff's position and duties within a team or an organization.

Scope of practice: refers to the activities or tasks a regulated professional is permitted to perform.

Status: refers to the current state or progress of a case being looked into. It indicates whether the case is active, pending, resolved, or closed, and includes any important updates or decisions reached.

Unprofessional conduct: according to the HPA, unprofessional conduct includes actions and behaviours that reflect poorly on the HCA profession. Unprofessional conduct also includes displaying a lack of knowledge, skill or judgment to provide professional services or any other behaviour that is defined as unprofessional conduct under section 1(1) of the HPA.

Unregulated healthcare providers: care providers who are neither regulated under the HPA nor registered by a regulatory body.

REFERENCES

ⁱ Definition of COLLEAGUE. (n.d.). Www.merriam-Webster.com. <https://www.merriam-webster.com/dictionary/colleague>

ⁱⁱ College of Licensed Practical Nurses and Health Care Aides of Alberta (CLHA). (2023). *Continuing Competence Program Guide*. <https://www.clha.com/lpn-knowledge-hub/continuing-competence-program-guide/>

ⁱⁱⁱ CCPNR, *Code of Ethics for Licensed Practical Nurses in Canada* (2013), *Standards, Codes, Policies - College of Licensed Practical Nurses and Health Care Aides of Alberta (CLHA.com)*.

^{iv} Council of Canadian Administrative Tribunals. *Administrative Tribunals in Canada*. [Microsoft Word - SimplifiedGuideEngABT.doc](#)

^v CCPNR, *Entry-Level Competencies*.