

A Plan to Establish a Canadian Accreditation Process for Massage Therapy Education Programs

**A Report prepared by the
National Accreditation Planning Committee
October 2013**

Accreditation refers to the approval by an independent agency that an education program meets a pre-defined standard.

Executive Summary

This report has been prepared by the National Accreditation Planning Committee, which represents a group of key Canadian stakeholders in massage therapy education.

The creation of the National Accreditation Planning Committee was the result of an initiative by the Federation of Massage Therapy Regulatory Authorities of Canada, in response to widespread support for accreditation within the profession.

The report has two objectives:

1. To stimulate further discussion of and support for the establishment of national accreditation, and
2. To provide an action plan and recommendations for moving forward.

Table of Contents

Introduction	3
The Committee’s Vision for Accreditation.....	5
Action Plan	7
The Massage Therapy Council for Accreditation	7
Operating principles.....	8
Initial tasks following appointment of the board	9
Building capacity in the Council	9
Resourcing	11
Relationship of Accreditation to Government Regulations Affecting Postsecondary Education Institutions	12
Moving Forward: Creating the Council and Appointing the First Board	14
Appendix 1: Planning Committee Membership	15
Appendix 2: Financial Projections	16
Appendix 3: Participation in Stakeholder Workshop.....	17
Appendix 4: Summary of Feedback from Stakeholder Workshop	19

Introduction

Most professions in Canada, particularly in the health sector, benefit from a national accreditation process for education programs. The advantages of national accreditation are well-established and include:

- promoting a common level of service provision nationally (benefiting patients)
- practitioner mobility (benefiting massage therapists, regulators and the national economy)
- the availability of objective information about program quality (benefiting students)
- improved access to educational resources (benefiting programs)

The desirability of national program accreditation has been much discussed within the massage therapy profession throughout its long history in Canada.

Over the years, massage therapists and their professional associations have striven for common national standards and for regulation. Massage Therapy is currently regulated by statute in only three provinces. In other jurisdictions a number of professional associations provide processes of voluntary self-regulation for their memberships; however standards of education and practice vary. This serves neither the profession nor the public well.

British Columbia has been alone among the regulated jurisdictions in having an accreditation process for massage therapy education. Program accreditation was initially provided by the regulatory body, the College of Massage Therapists of British Columbia (CMTBC). In addition, the Private Career Training Institutions Agency of BC (PCTIABC) provided organizational accreditation. In recent years CMTBC discontinued its accreditation process and now works in support of PCTIABC accreditation.

As a result of a federally-supported initiative to enhance labour mobility in line with changes made in 2009 to the federal-provincial *Agreement on Internal Trade*, massage therapy regulators undertook a project to align standards through the development of inter-jurisdictional practice competencies and performance indicators. In March 2012, at a national stakeholders' meeting to review the newly-created practice competencies and performance indicators, regulators, professional associations and representatives of education programs from across the country expressed strong support for a national accreditation initiative.

In January 2013 the Federation of Massage Therapy Regulatory Authorities of Canada (FOMTRAC)¹ engaged a consultant to create a stakeholder-driven action plan to establish national accreditation.

A 10-member National Accreditation Planning Committee was formed to provide direction for the project, with representation as follows².

Membership of the Planning Committee
Canadian Council of Massage Therapy Schools
Canadian Massage Therapist Alliance
College of Massage Therapists of British Columbia
College of Massage Therapists of Newfoundland & Labrador
College of Massage Therapists of Ontario
Massage Therapists' Association of BC
Newfoundland & Labrador Massage Therapists' Association
Ontario Council of Private Massage Therapy Colleges
Ontario Heads of Massage
Registered Massage Therapists' Association of Ontario

The Committee met both face-to-face and by distance over the period March - October 2013, activities culminating with the publication of this report. To broaden involvement, throughout its work the Committee distributed a series of Communication Bulletins to education programs, professional associations and relevant government agencies across Canada. Recipients were asked to further distribute the Bulletins to colleagues at their discretion, and names were freely added to the Committee's distribution list.

In its work the Committee drew upon resources made available by the Association of Accrediting Agencies of Canada (AAAC), including AAAC's *Guidelines for Good Practice of Accreditation of Professional Programs*. On behalf of the Committee, the Canadian Massage Therapist Alliance took out an associate membership in AAAC with the intention of transferring the membership to the yet-to-be created national accreditation organization.

¹ The members of FOMTRAC are the College of Massage Therapists of British Columbia (CMTBC), the College of Massage Therapists of Newfoundland & Labrador (CMTNL) and the College of Massage Therapists of Ontario (CMTO).

² See Appendix 1 for a list of Committee members.

The Planning Committee's conclusions, recommendations and proposed action plan were presented to stakeholders for feedback at a workshop held in Toronto on October 8 2013. There were 61 participants in the workshop (see Appendix 3). The Committee's general approach was strongly supported by participants; in addition numerous suggestions were made and issues were identified for future consideration (see Appendix 4). The Committee finalized this report shortly thereafter, incorporating workshop feedback.

The Committee's Vision for Accreditation

Early in its work the Committee concluded that in order to provide an accreditation service consistent with the *Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice (2012)*, established by Canadian regulators, and in order to ensure that accreditation policy and procedures remain in the control of the Massage Therapy profession, a specific-purpose accreditation agency should be newly established³. This conclusion was strongly supported at the stakeholder workshop.

To further guide its discussions the Committee developed a vision statement for massage therapy accreditation, which appears on page 6. This again was strongly supported by stakeholders.

³ Alternatives considered were application for inclusion in either Canadian Medical Association Conjoint Accreditation or the US Commission on Massage Therapy Accreditation.

The Planning Committee's Vision for Massage Therapy Accreditation

The purpose of the accreditation process is to provide a mechanism for quality assurance and continuing quality improvement of entry-level massage therapy education programs across Canada. Accreditation will foster a common national entry-level education standard that is based upon the entry-to-practice requirements in the regulated provinces, and in doing so will facilitate the initiation of regulation in provinces that are currently unregulated. Accreditation will support the advancement of massage therapy as a health care profession, thereby serving the public interest.

Accreditation operations will:

- Be administered by a newly-created, specific-purpose agency that is federally incorporated and governed collaboratively by massage therapy regulators, massage therapy educators and massage therapy professional associations
- Take place in a manner consistent with the *Good Practice Guidelines* published by the Association of Accrediting Agencies of Canada

Accreditation services will:

- Be available to programs that take place in both private and public education institutions
- Avoid redundancy with provincial government requirements applicable to education institutions
- Be available in both regulated and unregulated provinces
- Be available in both English and French

Accreditation standards will:

- Be based upon the *Inter-jurisdictional Practice Competencies and Performance Indicators* approved by the regulated provinces in 2012 (and incorporate future updates to that document)
- Be flexible in their application, focusing more on the student learning outcomes produced by the program than on the program's structure and process
- Be developed in consultation with stakeholders

Action Plan

The Massage Therapy Council for Accreditation

Based on available data in 2013 the following is the approximate size of the massage therapy education base in Canada, including both the regulated and non-regulated provinces:

	Education Institutions ⁴	Programs ⁵
Regulated provinces (BC, NL, ON)	34	60
Non-regulated provinces	51	unknown

Accreditation for programs in the regulated provinces will be *de facto* mandated by the regulators. In the non-regulated provinces accreditation will be voluntary, although it is expected to be attractive to those programs that support a national standard and promoted by like-minded professional associations.

The Committee recommends as follows:

- Program accreditation should take place under the auspices of a newly-created, specific-purpose organization to be incorporated under the Canada Not-for-Profit Corporations Act: the *Massage Therapy Council for Accreditation*.
- Governance of the Council should be collaborative, through an 8-member board of directors with equal membership from massage therapy regulators, educators, and professional associations (2 from each sector). The 2 additional non-sector board members should include one who is a massage therapist and one who is from another accredited health profession.
- Board member's roles and qualifications should be outlined in advance of the Board being established. All Board members should have experience in accreditation
- Board member terms of office should be 3 years, renewable for one additional term. The terms of appointment for the members from each sector should be

⁴ This report distinguishes between programs of study and the organizations that administer them (education institutions). As described in the vision statement, a process of programmatic accreditation is planned. Although massage therapy educators commonly refer to a program as a "school", this practice is somewhat confusing in that it fails to distinguish between the program and the institution that administers it. For this reason the terminology "school" has been avoided in the report.

⁵ A program is defined as a program of study that takes place in a specific physical location (a site or a campus), drawing upon distinct faculty, facility and equipment resources.

staggered to ensure continuity (the initial terms of appointment for some members should be 4 years to achieve this).

- Board nominees for the regulator sector should be identified by FOMTRAC. Board nominees for the private and public educator sector should be identified by the Canadian Council of Massage Therapy Schools (CCMTS). Board nominees for the professional association sector should be identified by the Canadian Massage Therapist Alliance (CMTA). Each of the nominating agencies should publish their nomination criteria to stakeholders, and engage in a public nomination process.
- Board nominees for the non-sector members should be invited from the profession in general, with criteria and through an open process developed by the Board.

Operating principles

The Committee recommends as follows:

- The board of the Council should operate using a policy governance model, with board members not routinely involved in operations or operational decision making.
- The Council should have a professional staff, led by a qualified CEO who reports to the board.
- Operational committees should be established as necessary, reporting to the board or to the CEO as appropriate. Stakeholder representatives to serve on committees should be appointed by the board through an open nomination process.
- Operations should be bilingual (English-French).
- Operations should be consistent with AAAC guidelines, contextualized to the massage therapy profession.
- Operations should be driven by a statement of values and ethics approved by the board.
- There should be an organizational culture of open communication.
- There should be an organizational focus on orientation, training and development.
- Financial best practice principles for non-profit organizations should be followed.

Initial tasks following appointment of the board⁶

The Committee recommends as follows:

- Soon after its appointment, the board should engage a professionally-qualified and experienced CEO to work with them to develop policies and to structure the organization.
- The board and the CEO should develop a comprehensive business plan which will guide the initial years of operation of the Council.
- The board and the CEO should develop organizational policies consistent with the AAAC Guidelines and drawing upon other available resources.
- The board and the CEO should develop accreditation requirements through a broad and thorough consultative process involving stakeholders (including education institutions). Key resources should include:
 - The *Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice (2012)* published by the members of FOMTRAC
 - AAAC Guidelines and other AAAC resources
 - Accreditation requirements of other professions
 - Accreditation requirements for massage therapy where available
- Staff should be recruited, reporting to the CEO. Administrative and support services may be contracted out, at the discretion of the board.
- An early objective for the Council should be to establish a pool of volunteer on-site reviewers who receive a thorough orientation and training relative to the accreditation process.
- In the initial years of operation, emphasis should be placed on providing information, support and training to programs, to help them understand the requirements and the process for achieving accreditation.

Building capacity in the Council

The initial 2-3 years of operations should emphasize policy development, capacity building and orientation / training for stakeholders relative to the accreditation process. While some program reviews may begin in year two, full program review capacity (suggested to be at the level of 15 reviews per year) will not occur until year 4.

⁶ Recommended actions to create the Council as an incorporated entity, and to appoint the first board, are contained in the final section of this report, Moving Forward.

For planning purposes it has been assumed that the term of full accreditation will be six years. A preliminary or conditional accreditation would be of significantly shorter duration. These assumptions are consistent with general practice among accreditation agencies.

The table below summarizes how the number of accredited programs will build over the first six years of the Council's operations.

Year of Operation	Calendar Year	Number of On-site Reviews Conducted	Cumulative No. of Accredited Programs Nationally (max.)⁷
1	2014	0	0
2	2015	4	4
3	2016	10	14
4	2017	15	29
5	2018	15	44
6	2019	15	59
7	2020	15	74

On this basis, by year seven (2020) it will be feasible to accredit all programs in the regulated provinces and up to 12 programs in the (currently) non-regulated provinces.

In the regulated provinces, only BC has currently-accredited programs. In order to maintain continuity of accreditation for the BC programs, a schedule of on-site reviews as shown in the table below will be necessary. Also included in the table is the approximate capacity to accredit programs in Ontario and Newfoundland & Labrador, based on the assumption that limited accreditation of programs in non-regulated provinces begins in 2016⁸.

⁷ This count is a maximum because (a) it assumes that all reviewed programs obtain accreditation and (b) it ignores the need to re-survey programs which initially fail to achieve accreditation or obtain less than a full six-year term.

⁸ The initiation of regulation in one or more currently non-regulated provinces would advance or increase this demand.

Calendar Year	BC	ON	NL	Other Provinces
2015		4		0
2016	2	6		2
2017	1	10	2	2
2018	4	9		2
2019		12		3
2020		10		5

Total capacity of the Council – given 15 on-site reviews per year – would be to maintain a roster of up to 90 accredited programs on an ongoing basis.

Resourcing

Expenditures

The table in Appendix 2 provides a rough estimate of the Council's operating costs for its first 10 years of activity.

Since the on-site portion of program reviews is a significant expense item, the following assumptions have been made:

- The on-site portion of program reviews will involve a team of 3 individuals (2 volunteer peer reviewers, 1 Council staff member)
- Volunteer reviewers will receive an honorarium of \$400 per day for 3 days per on-site review
- The average cost of travel / maintenance for an on-site review will be \$1,000 per team member

It is important to recognize that these assumptions have been made solely for financial planning purposes; they do not constitute recommendations from the Committee.

Based upon the information on Appendix 2 it has been concluded that the Council's annual expenditures when at full capacity (from year 4 onwards) will be approximately \$450,000.

Revenues

AAAC member agencies vary considerably in their sources of revenue for accreditation services. Some rely for funding exclusively upon annual fees paid by accredited programs. Others obtain funding exclusively from professional organizations. The majority utilize funding from both of these sources. As a result of this variation, annual

program fees among professions vary between zero and in excess of ten thousand dollars.

Based upon the Council's expenditure projections outlined above, if the sole revenue source were program fees, the annual program fee would be in the region of \$5,000⁹. Furthermore, the agency would operate at an annual deficit until the number of accredited programs approached 90, thus requiring some form of subsidization by the profession at large.

If no program fees are charged, meaning that organizations from within the profession sponsor accreditation and pay all costs, those organizations would be required to pay annually about \$27 per member¹⁰. The advantage of this funding model is that full revenues are theoretically achievable early in the life of the Council, thus avoiding the need for any additional subsidy in the capacity-building years.

The issue of the Council's approach to revenue generation was discussed at the Stakeholder Workshop; most participants favored an approach that combines annual program fees with ongoing sponsorship by professional organizations, with annual sponsorship fees dependent upon an association's membership. The Committee supports and recommends this approach.

In determining annual program fees, the Committee further recommends (1) that consideration be given to scaling fees based upon a program's enrolment, and (2) that organizations which operate similar programs in different geographical locations be considered for some form of discounted fee.

Relationship of Accreditation to Government Regulations Affecting Postsecondary Education Institutions

The majority of massage therapy education programs across Canada are offered by private education institutions (often, but not universally, called "private career colleges").

Each provincial and territorial government regulates private career colleges somewhat differently. Regulations typically involve requirements affecting financial and administrative matters, and student support. In most instances curriculum is also reviewed to some extent (although such matters might be deferred to a provincial regulator or to a third party accreditor if available). British Columbia is unique in providing an optional accreditation process for private career colleges (which becomes

⁹ $450,000 / 90 = 5,000$

¹⁰ The 3 regulatory bodies together with those professional associations from the non-regulated provinces which belong to CMTA represent approximately 17,000 active massage therapists. $450,000 / 17,000 = 26.47$

mandatory for institutions that wish their students to be eligible for student loans from government).

Given that massage therapy national accreditation as envisaged under the Council will be programmatic (not institutional), it will in general be complementary to provincial / territorial regulatory requirements applicable to private career colleges. In some instances a degree of alignment of the two processes might be possible, but national accreditation will not relieve private colleges of their responsibilities relative to provincial / territorial regulations.

Once accreditation becomes operational, programs seeking accreditation should be advised to inform their provincial government liaison persons early in their application process, to determine the degree of alignment that might be possible.

Massage therapy programs offered by public education institutions will be subject to institutional policies (some of which may derive from government requirements) that may include requirements for program review. National accreditation as envisaged under the Council will in general be complementary to these requirements, although once again some degree of alignment might be possible (at the institution's discretion).

The above notwithstanding, the Committee recommends that the accreditation requirements established by the Council should be constructed in such a way that as far as possible they avoid creating redundancy relative to provincial government requirements affecting schools.

Moving Forward: Creating the Council and Appointing the First Board

Consistent with the spirit of collaboration inherent in the Committee's recommendations for governance of the Council, as endorsed by the Stakeholder Workshop, the Committee believes that the initial formation of the Council as an incorporated entity should be undertaken collaboratively by FOMTRAC, CCMTS and CMTA.

The Committee recommends as follows:

1. That three individuals, collectively representing the Federation of Massage Therapy Regulatory Authorities of Canada, the Canadian Council of Massage Therapy Schools and the Canadian Massage Therapist Alliance,¹¹ work together with legal counsel to submit an application for incorporation of the *Massage Therapy Council for Accreditation* under the Canada Not-for-Profit Corporations Act.
2. That the founders establish an Advisory Committee, made up of members of the National Accreditation Planning Committee, which will function as an advisory group to the founders until such time as the first board of directors of the Council is appointed.
3. That immediately following incorporation, the founders seek funding from sponsoring organization(s) within the massage therapy profession, to enable the establishment of the Council as an operational organization with a functioning Board and CEO.
4. That the founders establish a website for the Council, to be used as a communication and information vehicle, and that communication with stakeholders become a priority.
5. That the founders develop and file Bylaws for the Council, consistent with the recommendations of this report as they relate to governance, ensuring input from stakeholders.
6. That the founders develop a Statement of Board Member Role, Responsibilities and Qualifications.
7. That the founders initiate a nomination process for Board members, through FOMTRAC, CCMTS and CMTA, consistent with the Bylaws.
8. That the founders appoint Board members from the nominees, and hand over all responsibilities to the Board.

¹¹ These three individuals are hereinafter referred to as the "founders" of the Council. The founders will be responsible for the Council from the time of its incorporation until the first board of directors is appointed.

Appendix 1: Planning Committee Membership

Lori Copeland	Ontario Heads of Massage
Randy Ellingson	Canadian Council of Massage Therapy Schools
Corinne Flitton	College of Massage Therapists of Ontario
Lori Green	Canadian Massage Therapist Alliance
Bodhi Haraldsson	Massage Therapists' Association of BC
Brandy John	Ontario Council of Private Massage Therapy Colleges
Samantha Piercey	College of Massage Therapists of Newfoundland & Labrador
Annette Ruitenbeek	College of Massage Therapists of BC
Bryn Sumpton	Registered Massage Therapists' Association of Ontario
Claudette Marie Warren	Newfoundland & Labrador Massage Therapists' Association

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Dr David Cane	
Catalysis Consulting	Project Consultant

Appendix 2: Financial Projections

	year 1	year 2	year 3	year 4	year 5	year 6	year 7	year 8	year 9	year 10
EXPENSES, \$										
# reviews undertaken (@ \$5400 ¹²)	0	4	10	15	15	15	15	15	15	15
review honoraria & travel	0	21600	54000	81000	81000	81000	81000	81000	81000	81000
board / committee support	10000	15000	20000	20000	20000	20000	20000	20000	20000	20000
professional staff	100000	100000	135000	175000	175000	175000	175000	175000	175000	175000
administration / support services	30000	50000	75000	75000	75000	75000	75000	75000	75000	75000
legal / insurance / memberships	15000	10000	10000	10000	10000	10000	10000	10000	10000	10000
program & reviewer orientation / training	0	15000	25000	25000	25000	15000	15000	15000	15000	15000
office equipment	5000	5000	1000	1000	5000	1000	1000	5000	5000	1000
IT support	7000	7000	1000	1000	1000	1000	1000	1000	1000	1000
materials & supplies	1000	1000	2000	2000	2000	3000	3000	3000	3000	3000
facility rental	20000	40000	40000	40000	40000	40000	40000	40000	40000	40000
total expenditure	188000	264600	363000	430000	434000	421000	421000	425000	425000	421000

¹² \$3000 travel + \$2400 honoraria = \$5400

Appendix 3: Participation in Stakeholder Workshop

Association of Accrediting Agencies of Canada, Ontario	Janis Leonard
Algonquin College, Ontario	Marvin Mohring
Bryan College, Ontario	Adriana Costenaro
Bryan College, Ontario	Jette Henriksen
Canadian College of Health Science & Technology (CCHST), Ontario	Chris Mingay
Canadian College of Massage & Hydrotherapy, Ontario	Tatum Johnson
Canadian College of Massage & Hydrotherapy , Ontario	Terry Lynn Nolan
Canadian Council of Massage Therapy Schools & Lethbridge College, Alberta	Jim Manzara
Centennial College, Ontario	Wray Barraclough
Centennial College, Ontario	Mark Fox
College of Massage Therapists of Ontario	Dave Janveau
College of Massage Therapists of Ontario	Evelyn Waters
College Boreal, Ontario	Julie Levac-Rancourt
D'Arcy Lane Institute, Ontario	Cheryl Samson
Elegance School, Ontario	Helene Adams
Elegance School, Ontario	Deborah Quantz
Everest College, Ontario	Cheryl Russell-Julien
Everest College, Ontario	Barb Jay
Georgian College, Ontario	Brian Dormer
Georgian College, Ontario	Ilan Robertson
Humber College, Ontario	Amanda Baskwill
ICT Kikkawa, ICT Northumberland College, Halifax, Moncton	Shirley Desborough
Institute of Complementary & Alternative Therapies, Ontario	Shirlee Rankin
International Academy of Massage Inc. & Ontario Council of Private Massage Therapy Colleges, Ontario	Ian Marshall
Lambton College, Ontario	Greg Shortt
Massage Therapists' Association of British Columbia	Brenda Locke
Massage Therapy Association of Manitoba	George Fraser
Massage Therapy Association of Manitoba	Susan Kos-Whicher
Medix School, Ontario	Patrick Stapleton
Medix School, Ontario	Mark Chee-Aloy
National Institute, Ontario	Pankaj Bhargava
National Institute, Ontario	Mamta Bhargava
Natural Health Practitioners of Canada, Alberta	Candace Pichonsky
Natural Health Practitioners of Canada, Alberta	Jan Bagot
New Brunswick Massotherapy Association Inc.	M. R. Joceline Dupuis
Newfoundland and Labrador Massage Therapy Association	Sara Sexton

PEI Massage Therapy Association & Canadian Massage Therapist Alliance	Marilyn Sparling
Planning Committee (Consultant)	David Cane
Planning Committee (College of Massage Therapists of BC)	Annette Ruitenbeek
Planning Committee (Newfoundland & Labrador Massage Therapists' Association)	Claudette Marie Warren
Planning Committee (College of Massage Therapists of Ontario)	Corinne Flitton
Planning Committee (Massage Therapists' Association of BC)	Bodhi Haraldsson
Planning Committee (Ontario Council of Private Massage Therapy Colleges)	Brandy John
Planning Committee (Ontario Heads of Massage)	Lori Copeland
Planning Committee (Canadian Massage Therapist Alliance, Saskatchewan)	Lori Green
Planning Committee (Registered Massage Therapists' Association of Ontario)	Bryn Sumpton
Planning Committee (Canadian Council of Massage Therapy Schools)	Randy Ellingson
Registered Massage Therapists' Association of Ontario	Debbie Wilcox
Royal Canadian College, Ontario	Dr. Dmytro Bryushkov
Royal Institute of Science and Management, Ontario	Sherry Hang
Sutherland Chan School, Ontario	Debra Curties
Sutherland Chan School, Ontario	Peter Becker
Trillium College, Ontario	Jessica Rogers
Utopia Academy, British Columbia	Bianca Ashe
Wellington College, Manitoba	Dale Gran
Wellington College, Manitoba	Sheila Bergman
West Coast College, New Westminster, Victoria BC	Brian Goldstein
West Coast College, New Westminster, Victoria BC	Cidalia Paiva
Western College, Saskatchewan	Michael Harvey
Western College, Saskatchewan	Wayne Baiton
Westervelt College, Ontario	Melissa Wood
Westervelt College, Ontario	Linda Kalmikov
Media (Massage Therapy Canada)	Mari-Len De Guzman

Appendix 4: Summary of Feedback from Stakeholder Workshop

What's Exciting?

- Consistency
- Standardization **
- Unification**
- Collaboration*****
- Credibility for the profession
- Helps with regulations
- Better quality for students**
- Open process
- Increasing entry-to-practice standards
- Improved business plans**
- Models and funding

What are the Obstacles?

- Maintain feelings of inclusion
- Clarity in accreditation steps
- Clarity for the Inter-Jurisdictional Competencies
- Fee schedule for schools*****
- Timeline
- Private vs public program needs
- Getting provincial associations in unregulated provinces to drive this process in their jurisdictions*****
- The model of accreditation we chose
- Communication with stakeholders
- Keeping professional associations involved

* indicates multiple mention