

W11038

To: Workers' Compensation Board of British Columbia  
Policy & Regulation Development Bureau

From: Anne Watt R.N.  
Courtenay B.C.

Re: Proposed Amendments: Occupational First Aid  
Section 3.14 & 3.15 [c]

To Whom it may concern:

As a Registered Nurse [with 35 years of experience], I am employed at Glacier View Lodge in Courtenay. My workplace [a long term care facility of 102 residents] is staffed with a RN in charge 24/7. For this reason, the in-charge 12 hour shift nurse, as a condition of employment, assumes responsibility as the one, on-site, certified first aid attendant.

Compliance with WCB regulations at my workplace then, require at hiring, initial certification in Occupational First Aid level 1, and recertification every 2 years thereafter. This causes a great deal of inconvenience/expense and frustration to my employer/my colleagues and me.

As you are well aware OFA Level 1 provides only the most basic first aid training-to any healthy applicant, age 16 and over, on payment of the registration fee. In fact most participants in classes I have attended are novices to first aid of any kind.

Registered nurses licensed to practice in this province are more than capable of providing first aid above this level without participating in this mind-numbing exercise. The costs involved to recertify are not insignificant \$60 paid registration fee, 8 hours paid time [in my case \$32.24/hour x 8]. At my worksite there are 12 experienced RN's requiring this mandatory recertification every 2 years-if certification lapses as it does inadvertently on occasion, the RN involved is not allowed to work until the class is taken and certification renewed. It requires some diligence to book a class before valid ticket expires and reschedule shifts with [also paid] casual nurses.

I believe this requirement for Registered Nurses is expensive/demeaning/time consuming and in my opinion, plain goofy.

The wording of proposed amendment Section 3.14 Definition of Attendant seems to address this issue when it says---OR by a person recognized by the board and who is designated as an attendant by the employer. The proposed amendment to section 3.15[c]-attendant requirements-includes similar wording. Also noted: proposed changes to prerequisite for OFA Level 2 for registered nurses licensed in BC, Level 1 is not required.

If the board recognized and the employer designated the RN as an attendant, simplifying this entire process, saving time and money. I hope I have made a case against this arcane regulation that affects all worksites where a RN is the first aid attendant.

I recommend adoption of these proposed amendments.

Thank you for your consideration in this matter.

Yours truly,

Anne White RN