

Government of Alberta Health Care Aide Provincial Curriculum Substantial Equivalence Assessment Policies



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Introduction

Background

The title Health Care Aide (HCA) applies to direct client service providers who provide basic health services and assistance/support with activities of daily living for clients with medical conditions or functional limitations.¹ HCAs are not a self-governing profession under the *Health Professions Act*, nor do HCAs have a central organization that advocates for the occupation.

HCAs are the largest occupational group in the continuing care sector and constitute the second largest group of health care workers in Alberta, after registered nurses.² It is estimated that in the continuing care sector more than 70% of the direct care is provided by HCAs.^{3,4}

In accordance with the Continuing Care Health Service Standards (2018) there are three ways in which a HCA is recognized for practice in Alberta. They can be recognized as a “certified” HCA who graduated from a program approved in Alberta, they can be “deemed competent” by their employer who completes a competency assessment tool for the HCA, or they can be deemed “substantially equivalent”.

Substantial equivalence is the process of reviewing education submitted by the health care provider who was educated outside of Alberta or who was educated in Alberta but not currently certified on the Directory. The Substantial Equivalence Assessment will provide an evaluation of the documentation provided by the health care provider in order to determine if the competencies they hold can be considered equivalent to those required of the certified Alberta HCA graduate.

Substantial Equivalence Assessment Policies

The purpose is to guide the development and implementation for assessing whether an Applicant’s education is substantially equivalent to the most recent Government of Alberta HCA Provincial Curriculum.

The Policies were developed by the College of Licensed Practical Nurses of Alberta (CLPNA) in collaboration with the Ministry of Health.

The Policies have implications for the following groups:

- **The CLPNA** is responsible for developing and administering the Substantial Equivalence Assessment process.
- **The Ministry of Health** has a Service Agreement with the CLPNA to administer the Substantial Equivalence Assessments.
- **Employers** are responsible for HCA employment, performance, and competency assessment.
- **Applicants of Substantial Equivalent Assessment for the HCA occupation in Alberta.**

Glossary

Term	Description
aggregate data	For the purposes of substantial equivalence, aggregate data refers to detailed data on HCAs that has been summarized to provide information about HCAs and where they are coming from as a group. Individual HCAs would not be identifiable. This is the type of information that would be provided in reports produced by the Alberta Health Care Aide Directory (Directory).
HCA	Health care aides (HCAs) are an unregulated, direct client service providers of basic health services and assistance/support with activities of daily living for clients who have medical conditions or major functional limitations. HCAs provide basic personal care and health services in all health sectors to meet the daily living needs of clients.
CAP Tool	The Competency Assessment Profile (CAP) tool is a standardized provincial assessment tool that aligns with the most recent Alberta HCA curriculum. It is used by employers to assess HCA's ability to meet the required competency.
CCHSS	The Continuing Care Health Service Standards (CCHSS) - 2018 sets the minimum requirements that operators must comply with in the continuing care health system (includes Coordinated Home Care Program, Supportive Living facilities and Long-Term Care Facilities). ⁵
HCA Competency Profile	Outlines the knowledge, skills, behaviours, and attitudes required by all HCAs who deliver care in Alberta. It outlines the core competencies for HCAs and provides the foundation and structure for the Curriculum.
competency status	<p>The attainment of core competencies in one of three possible competency statuses⁶:</p> <p>Certified: certified as a HCA through a Government of Alberta licensed post-secondary institution using the Government of Alberta HCA Provincial Curriculum.</p> <p>Substantially Equivalent: an educational background deemed equivalent by the CLPNA as compared to the approved Provincial HCA Curriculum.</p> <p>Deemed Competent: assessed as competent within 12 months of being hired by an Operator using the Provincial CAP tool (See CCHSS Standard 8.4). A licensed nurse designated by the employer as the evaluator must complete the CAP tool in conjunction with the HCA.</p>
direct patient care	Direct patient care refers to activities that assist the patient in meeting their basic needs.

Term	Description
Directory	The Alberta Health Care Aide Directory (Directory) is a centralized database that collects individual information, including demographics, education, employment details and attainment of core competencies, as defined in the Continuing Care Health Services Standards (CCHSS) for HCAs in Alberta. The Alberta HCA Directory serves as a central resource for HCA information, news and updates.
directory administrator	The College of Licensed Practical Nurses of Alberta.
directory status	Directory status includes: <ul style="list-style-type: none"> • A HCA who is currently enrolled in the Directory. • An inactive status assigned to a HCA previously enrolled on the Directory who has not renewed their enrolment on the Directory.
employer	A legal entity that provides health care directly to clients. ⁷
Curriculum (2019)	The Government of Alberta HCA Provincial Curriculum-2019 (Curriculum 2019) is based on the Government of Alberta HCA Competency Profile (2018) and outlines the knowledge, learning activities and instructional methods that facilitates attaining the key competencies required for HCAs to provide safe, quality care to Albertans.
in-progress enrolment	HCAs who are working towards one of the three competency statuses (certified, substantially equivalent or deemed competent).
PIPA	<i>Personal Information Protection Act (PIPA)</i> governs the collection, use and disclosure of personal information by private sector organizations in a manner that recognizes both the right of an individual to have his or her personal information protected, and the need of organizations to collect, use, or disclose personal information for purposes that are reasonable. ⁸
PSI	Post-Secondary Institution (PSI) licensed to use the approved Government of Alberta HCA Curriculum.
Substantial Equivalence Assessors	Qualified professionals who conduct the Substantial Equivalence Assessments
workforce planning	Workforce planning (also known as health human resource planning) refers to the analysis, evaluation, forecasting and management of the supply and demand of human resources, aligning with the employer's strategic plan. ⁹

1.0 Eligibility for Substantial Equivalence Application

Policy #	1.0
Policy Title	Eligibility for Substantial Equivalence Application
Rationale	Provides a systematic approach to determine if individuals who have not completed an approved HCA program in Alberta are eligible to apply for Substantial Equivalence Assessment.

Policy Statement

#	Policy Statement	Rationale
1.1	<p>Applicants eligible to be assessed for HCA substantial equivalence, include:</p> <ul style="list-style-type: none"> • Out-of-province HCA Program graduates; • Internationally Educated Nurses; • Alberta educated HCAs who graduated prior to 2005 who are not currently certified on the Directory; and • Individuals with a combination of education and experience as a personal support worker, continuing care assistant, nurse, or other occupation that practices within the competencies of an Alberta HCA 	<ul style="list-style-type: none"> • Identifies the most appropriate health care providers who may apply for substantial equivalence. • Only applicants who provide direct care to clients will be considered for substantial equivalence. • Applicants will have education and experience within the scope of the <i>Alberta HCA Competency Profile</i>.
1.2	<p>1.2.1 Applicants not eligible to be assessed for HCA substantial equivalence, include</p> <ul style="list-style-type: none"> • Applicants who do not have education in an occupation that provides direct patient care; or • Graduates of programs for unregulated professions in Alberta other than the HCA Program. <p>1.2.2 Ineligible applicants will be referred to a licensed post-secondary institution that offers the HCA Program</p>	<ul style="list-style-type: none"> • To ensure eligible applicants have education and experience within the scope of the Alberta HCA Competency Profile. • To provide ineligible applicants with information on HCA Programs in Alberta, should they choose to pursue formal training.

2.0 Substantial Equivalence Application Requirements

Policy #	2.0
Policy Title	Substantial Equivalence Application Requirements
Rationale	To identify the required information an applicant must provide to be assessed for substantial equivalence.

Policy Statement

#	Policy Statement	Rationale
2.1	<p>Applicants must enroll on the HCA Directory and must provide the following information on the application form:</p> <ul style="list-style-type: none"> – Legal Surname – Legal First Name – Legal Middle Name – Usual Name – Date of Birth – Gender – Languages written/ spoken – Full address (apartment/suite, address, city, province, country, postal code) – Main telephone – Other Telephone – Email address – Credential type (e.g. degree, diploma, certificate) – Date credential granted – PSI granting the credential – PSI address, website, phone number – Employment Status <p>If applicable:</p> <ul style="list-style-type: none"> – Employer(s) name – Employer(s) address – Employment status (full time, part time, casual) for each employer – Current place of work Start date/End date 	<ul style="list-style-type: none"> • These requirements are needed to uniquely identify applicants. • Provides information of substantial equivalent applicants in Alberta for the purposes of workforce and educational planning and employment research.
2.2	<p>Applicants must submit proof of identity using two (2) valid government-issued identifications; one must be photo identification.</p>	<ul style="list-style-type: none"> • Helps prevent fraudulent identity activities.

#	Policy Statement	Rationale
2.3	<p>2.3.1 Applicants must have the curriculum and transcripts of the program they completed sent directly from the PSI to the CLPNA to be assessed for equivalence.</p> <p>2.3.2 If the curriculum is not available, a detailed course syllabus and/or curriculum objectives supplied by the educational institution will suffice.</p> <p>2.3.3 In cases where the school is unable to provide curriculum or transcripts, the applicant's personal copies of the transcript, course syllabus or curriculum objectives, will be used for evaluation and this will be identified in the assessment results.</p> <p>2.3.4. In cases where the applicant is unable to produce required documentation they may be eligible to have past work experience assessed to support their application for substantial equivalence or qualify for a Prior Learning Assessment and Recognition or a competency assessment profile.</p>	<ul style="list-style-type: none"> • Allows for the assessment of the integrity and validity of the curriculum documents submitted by the applicant. • The curriculum is the foundation of the Substantial Equivalence Assessment. • Allows applicants alternative options if the curriculum is inaccessible.
2.4	<p>2.4.1 Applicants must provide evidence of English Language Proficiency.</p> <p>2.4.2 English Language Proficiency must be met by providing evidence of:</p> <ul style="list-style-type: none"> • successful completion of a high school program in English, in any country; OR • successful completion of English Language Arts Grade 11 or 12, or Canadian equivalent; OR • a Canadian High School Equivalency Diploma (General Education Development – GED test) in English; OR • completion of health care related training in English that includes a clinical component where the language spoken is English (such as training as a Health Care Aide or nursing); OR 	<ul style="list-style-type: none"> • Ensures applicants meet expected English language standards.

#	Policy Statement	Rationale
	<ul style="list-style-type: none"> • completion of a minimum of 2 years of post-secondary delivered in English; • Confirmation of work experience in a healthcare setting where care is delivered in English within the past two-year period; OR • Required Canadian Language Benchmark (CLB) of a minimum of 7 in each of the 4 language skills (speaking, listening, reading and writing) and not an average of 7. <p>Approved English Language tests (must be official test results):</p> <ul style="list-style-type: none"> • IELTS Academic: 6; no section score below 5.5; or • TOEFL iBT: 71; or • CELPIP General: 7 no section score below 6; or • Canadian Language Benchmarks/Milestones Test (also includes the CLB Placement test): 7 in each strand, not an average of 7; or • Duolingo English Test: Minimum score of 95 must be achieved; • CELBAN: 7 in each area of listening, reading, writing, and speaking, not an average of 7. 	
2.5	<p>Upon receipt of the application for Substantial Equivalence the HCA applicant is deemed 'in progress' on the Directory as indicated by a status of "Sub. Eq (Assessment) – In Progress" and eligible to work as a HCA while assessment is underway</p>	<ul style="list-style-type: none"> • This helps to facilitate entry into the workforce without delay and supports the health care system.

3.0 Student Nurses' Eligibility for Substantial Equivalence Application

Policy #	3.0
Policy Title	Student Nurses' Eligibility for Substantial Equivalence Application
Rationale	Provides a systematic approach to enrolling Alberta nursing students to urgently address the shortage of HCAs in Alberta during the COVID-19 pandemic Provincial response.

Policy Statement

#	Policy Statement	Rationale
3.1	Nursing students must enrol on the HCA Directory in order to be employed as a HCA in Alberta.	<ul style="list-style-type: none"> Enrolment in the HCA Directory is a requirement for employment at a publicly funded facility in Alberta.
3.2	<p>3.2.1 Alberta Nursing students eligible for substantial equivalence and employment as a HCA in Alberta must meet the following criteria:</p> <ul style="list-style-type: none"> a Practical Nursing (PN) student currently enrolled in an Alberta program who has completed one full year of the program; or a Baccalaureate Nursing (BN or BScN) student currently enrolled in an Alberta program who has completed two full years of the program; or a Psychiatric Nursing student currently enrolled in an Alberta program who has completed two full years of the program. <p>3.2.2 Alberta Nursing students meeting requirements in 3.2.1 must also meet the following:</p> <ul style="list-style-type: none"> The nursing student has completed a continuing care or medical unit clinical placement; and The nursing student has some knowledge and experience with medication assistance. 	<ul style="list-style-type: none"> Identifies the eligible nursing students who may apply for enrollment on the Directory through the substantial equivalence stream. Sets the minimum knowledge and skill level required to provide safe, competent and ethical care. Nursing students currently enrolled in Alberta programs can be swiftly deployed to facilities in Alberta.

3.3	Alberta nursing students must provide a copy of unofficial transcripts from their program of study. They may be supplied directly from the applicant.	<ul style="list-style-type: none"> • Provides verification that the nursing student has met the criteria.
3.4	Substantial Equivalence Assessment fees are not applicable for nursing students.	<ul style="list-style-type: none"> • Eliminates the potential barrier of cost to enroll on the Directory. • Helps to expedite potential HCA.
3.5	This policy shall expire upon commencement of Health Care Aide Regulation.	<ul style="list-style-type: none"> • The policy addresses the COVID-19 pandemic response to supply sufficient HCAs during the pandemic. • The policy aims to support Alberta Nursing students who meet the requirements to work as HCAs to the point of HCA regulation, at which point the policy will be reevaluated.

4.0 Substantial Equivalence Fees

Policy #	4.0
Policy Title	Substantial Equivalence Fees
Rationale	Application fees cover the costs associated with the assessment of substantial equivalence applications.

Policy Statement

#	Policy Statement	Rationale
4.1	Applicants must pay the application assessment fee in order to process their application for substantial equivalence.	<ul style="list-style-type: none"> The substantial equivalence process operates at cost recovery.
4.2	If the application is incomplete after one year of paying the fee and beginning the SE process, CLPNA will issue a full refund, less an administration fee.	<ul style="list-style-type: none"> The CLPNA is required to return unapplied funds to applicants to avoid maintaining liability.
4.3	Applicants who withdraw from the Substantial Equivalence Assessment prior to their application documents being received by the CLPNA will be eligible for a full refund, less an administration fee.	<ul style="list-style-type: none"> The CLPNA is required to refund applicants in regard to services not rendered to avoid any liability.
4.4	Application fees are non-refundable once all application documents have been received by the CLPNA.	<ul style="list-style-type: none"> Allows for appropriate compensation for the work started and/or completed by the CLPNA.

5.0 Substantial Equivalence Application Review

Policy #	5.0
Policy Title	HCA Substantial Equivalence Application Review
Rationale	Substantial Equivalence Assessors must be trained to complete a standardized review that is fair, transparent and consistent.

Policy Statement

#	Policy Statement	Rationale
5.1	<p>5.1.1 The CLPNA will develop minimum competencies for Substantial Equivalence Assessors.</p> <p>5.1.2 Substantial Equivalence Assessors will receive required training and will work under the direction of the CLPNA's Registrar.</p>	<ul style="list-style-type: none"> Substantial Equivalence Assessors' training must be consistent and standardized. Allows for consistent Substantial Equivalence application reviews
5.2	The CLPNA will ensure that there are a minimum of three staff trained in HCA Substantial Equivalence Assessment.	<ul style="list-style-type: none"> Allows for continuity of the standardized substantial equivalence process and decreases potential for interruption to the services.
5.3	Substantial Equivalence Assessments will be based on the HCA Program learning outcomes in the most recent Curriculum.	<ul style="list-style-type: none"> The most current Curriculum must be utilized for Substantial Equivalence Assessments.
5.4	The CLPNA will develop and maintain a tool for the purposes of Substantial Equivalence Assessment of HCAs.	<ul style="list-style-type: none"> Assessors must use a consistent methodology framework in the assessment process.
5.5	Applicants will receive a letter from the CLPNA informing them of their assessment result within 12 weeks of receiving the curriculum or alternative documents.	<ul style="list-style-type: none"> Provides a timeframe in which the applicant will be able to plan for a result. Provides an adequate timeframe for assessors to complete the assessments and provide the applicant with the result. Provides the applicant with a written decision for their records.
5.6	<p>5.6.1 Successful applicants must complete the <i>Working in Alberta</i> self-study module before CLPNA will place them on the HCA Directory as substantial equivalent.</p> <p>5.6.2 Applicants may complete the <i>Working in Alberta</i> self-study</p>	<ul style="list-style-type: none"> Provides assurances that the applicant has the basic knowledge before entering practice in Alberta.

#	Policy Statement	Rationale
	<p>module after going through the substantial equivalent process.</p> <p>5.6.3 Successful applicants must complete the <i>Working in Alberta</i> self-study module within one year of being deemed substantially equivalent to ensure currency of practice.</p>	
5.7	<p>Applicants deemed not substantially equivalent will be provided with a gap analysis report and options to remediate the gaps. Options include referral to PSIs offering the HCA Program and/or Prior Learning Assessment and Recognition (PLAR) programs or to have an employer complete a competency assessment profile.</p>	<ul style="list-style-type: none"> • Provides objective reasons for assessment decision. • Provides an unsuccessful applicant with options should they choose to pursue employment as a HCA.
5.8	<p>5.8.1 Applicants whose applications are incomplete (e.g., do not have their application documents submitted) within 12 months of receipt of their application and fee will have their file closed.</p> <p>5.8.2 CLPNA will provide options to applicants with incomplete applications after one year such as completion of the Alberta HCA programs or a PLAR program.</p>	<ul style="list-style-type: none"> • Informs applicants of length of time CLPNA will keep their application open. • Informs applicants of avenues to pursue if substantial equivalent process can't be completed. E.G. unable to obtain necessary documents.

6.0 Substantial Equivalence Decision Appeal Process

Policy #	6.0
Policy Title	Substantial Equivalence Decision Appeal Process
Rationale	To provide applicants with the opportunity to appeal the decision of their assessment results.

Policy Statement

#	Policy Statement	Rationale
6.1	Applicants disagreeing with the results of their assessment may submit a written appeal to the CLPNA within a maximum of five business days of the receipt of the assessment decision.	<ul style="list-style-type: none"> Allows for a mechanism of appeal. To adhere to principles of administrative fairness.
6.2	Another member of the review team will independently assess the appeal request within 10 business days. The team members will discuss their independent reviews and come to a decision.	<ul style="list-style-type: none"> This promotes inter-rater reliability, consistency in decision-making.
6.3	Where two team members cannot reach a decision, a third reviewer will review the appeal documents and reach a decision with the other members.	<ul style="list-style-type: none"> This promotes inter-rater reliability, consistency in decision-making.
6.4	If the applicant remains unsatisfied with results of the CLPNA appeal process, they may submit a written appeal to Alberta Health within five business days of the receipt of the appeal decision.	<ul style="list-style-type: none"> This provides another mechanism other than judicial review for the applicant to pursue if they remain unhappy with the decision.
6.5	The CLPNA will submit a substantial equivalence appeal report (including reasons for decision-making) to Alberta Health for review within five business days of receipt of a request from Alberta Health.	<ul style="list-style-type: none"> To adhere to principles of administrative fairness.

7.0 Post Secondary Institution Education Assessed as Not Substantially Equivalent

Policy #	7.0
Policy Title	Education Not Substantially Equivalent
Rationale	PSI HCA education may be assessed by the CLPNA and denied substantially equivalence to HCAs in Alberta. Managing a substantial equivalent applicant's assessment beyond education is considered.

Policy Statement

	Policy Statement	Rationale
7.1	<p>7.1.1 The CLPNA will maintain a list of all PSI programs known to be not deemed substantially equivalent to the Alberta HCA Program on the Alberta HCA Directory website. These programs will include Alberta Programs, Out-of-Province Programs and International Programs.</p> <p>7.1.2 This list shall be publicly available and updated as required.</p>	<ul style="list-style-type: none"> Applicants will be aware of programs not substantially equivalent prior to submitting an application.
7.2	<p>Even if a PSI's program has previously been denied substantial equivalence, the CLPNA will conduct a review of each individual application for substantial equivalence.</p>	<ul style="list-style-type: none"> Every applicant will have a full assessment and receive equal consideration, PSIs change curriculums over time and a program previously found not substantially equivalent may have changed to be substantially equivalent.
7.3	<p>7.3.1 Within 90 days, applicants denied substantial equivalence have the opportunity to provide additional documentation to support their submission prior to a denial being issued.</p> <p>7.3.2 The CLPNA will accept the following supporting documentation from original source;</p> <ul style="list-style-type: none"> Additional educational documents (transcripts, training, programs, etc.). 	<ul style="list-style-type: none"> Provides a more holistic Substantial Equivalence Assessment for the applicant not solely based on curriculum but on their complete education, training and experiential history.

8.0 Retention of Program Curricula

Policy #	8.0
Policy Title	Retention of Program Curricula
Rationale	The retention of curricula and associated materials allows for Substantial Equivalence Assessments and/or reviews, as well as the ability to audit past decisions for process improvement.

Policy Statement

	Policy Statement	Rationale
8.1	The CLPNA will retain a copy of all program curriculum or alternative documents received to conduct the Substantial Equivalence Assessment for a period of no less than five years.	<ul style="list-style-type: none"> • A five-year period of retention allows the curriculum or alternative documents to be available when applicants request to appeal the assessment decision. • Allows for faster processing time for applicants from the same program within the five-year time-period. • After five years, currency of documents may wane; PSIs often update curricula.
8.2	The CLPNA Substantial Equivalence Assessment will develop a repository of PSIs outside of Alberta that offer programs that are substantially equivalent to the HCA Program. This information will be maintained for a period of no less than 10 years.	<ul style="list-style-type: none"> • Allows for faster processing time for applicants from the same program within the same time-period. • Allows for consistency in decision making for applicants from the same program. • Allows for evaluation of programs when in the future the program curriculum may not be accessible.

References

- ¹Alberta Health. Health Care Aide Curriculum. 2010. (Modified). Note that “HCA” refers to an occupation. Individual workers in this occupation may have a variety of titles (including HCA, Nursing Attendant, Home Support Aide, and Home/Personal/Residential Support Worker).
- ²Estimates address all health care workers across the provincial health system with registered nurses as the largest group of health care workers at approximately 34,000, followed by health care aides at approximately 22,000.
- ³Janes, N., Sidani, S., Cott, C., Rappolt, S. Figuring it out in the moment: A theory of unregulated care providers’ knowledge utilization in dementia care settings. *Worldviews of Evidence Based Nursing*. 2008; 5:13-24.
- ⁴Continuing Care Workforce Working Group. A Framework of Provincial Human Resource Objectives, Strategies and Action Plans for the Future Continuing Care Sector: A Report of the Continuing Care Workforce Working Group. 2001.
- ⁵ Alberta Health. 2018. Continuing Care Health Service Standards. <https://open.alberta.ca/dataset/c3e8d212-d348-42e0-b29c-5a264c8cb568/resource/8c9af77e-ca21-4f73-b3ee-a63c6b980073/download/continuing-care-health-service-standards-2018.pdf> Accessed May 31, 2021. An exception to the timelines is made for HCA competency assessment in acute care.
- ⁶ Adapted from: Alberta Health. 2018. Continuing Care Health Service Standards. <https://open.alberta.ca/dataset/c3e8d212-d348-42e0-b29c-5a264c8cb568/resource/8c9af77e-ca21-4f73-b3ee-a63c6b980073/download/continuing-care-health-service-standards-2018.pdf> Accessed May 31, 2021. An exception to the timelines is made for HCA competency assessment in acute care.
- ⁷ Adapted from: Alberta Health. 2018. Continuing Care Health Service Standards. <https://open.alberta.ca/dataset/c3e8d212-d348-42e0-b29c-5a264c8cb568/resource/8c9af77e-ca21-4f73-b3ee-a63c6b980073/download/continuing-care-health-service-standards-2018.pdf> Accessed May 31, 2021. An exception to the timelines is made for HCA competency assessment in acute care.
- ⁸ Office of the Information and Privacy Commissioner of Alberta. Principles. [http://www.oipc.ab.ca/pages/Personal Information Protection Act/Principles.aspx](http://www.oipc.ab.ca/pages/Personal%20Information%20Protection%20Act/Principles.aspx) Accessed December 2015.
- ⁹ Government of Alberta. 2008. Provincial Health Human Resource Planning & Guide for Health Authorities. <http://www.health.alberta.ca/documents/Workforce-Health-HR-plan-2008.pdf> Accessed January 2016.