



COLLEGE OF NURSES
OF ONTARIO
ORDRE DES INFIRMIÈRES
ET INFIRMIERS DE L'ONTARIO

THE STANDARD OF CARE.
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January 30, 2009

The Honourable David Caplan
Minister of Health and Long-Term Care
HPRAC Consultations
56 Wellesley Street West, 12th Floor
Toronto ON M5S 2S3

Dear Minister Caplan:

Thank you for the opportunity to comment on reports submitted to you by the Health Professions Regulatory Advisory Council (HPRAC). Please find attached responses from the College of Nurses of Ontario on two of the reports recently released:

A Report to the Minister of Health and Long-Term Care on the Review of the Scope of Practice for Registered Nurses in the Extended Class (Nurse Practitioners)

and

An Interim Report to the Minister of Health and Long-Term Care on Mechanisms to Facilitate and Support Interprofessional Collaboration among Health Colleges and Regulated Health Professionals.

The Ontario government's investment in Nurse Practitioners (NPs) has been significant over the years. As a result of these investments, and the increase in the number of NPs regulated by the College of Nurses (CNO) over the past decade, more and more Ontarians throughout the province are benefiting from the high-quality health care services provided by NPs.

CNO is appreciative of the significant efforts HPRAC has made to understand, and advise on, highly complex issues regarding the regulation of NPs and the evolution of their practice. In our attached responses, we support many of HPRAC's recommendations and offer alternative perspectives on others. We look forward to working with the Ministry on the implementation of a more enabling legislative framework for NP practice in Ontario that will enhance the delivery of safe and competent care.

Sincerely,

Anne L. Coghlan, RN, MScN
Executive Director

/tj



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The College of Nurses of Ontario's response to:

*An Interim Report to the Minister of Health and
Long-Term Care on Mechanisms to Facilitate
and Support Interprofessional Collaboration
among Health Colleges and Regulated Health
Professionals (March 2008)*

January 30, 2009

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INTRODUCTION

The College of Nurses of Ontario (CNO), the regulatory body for over 148,000 Ontario nurses¹, is pleased to provide input on the recently released Health Professions Regulatory Advisory Council (HPRAC) report entitled *An Interim Report to the Minister of Health and Long-Term Care on Mechanisms to Facilitate and Support Interprofessional Collaboration among Health Colleges and Regulated Health Professionals*.

CNO is generally supportive of HPRAC's recommendations regarding acupuncture and psychotherapy and acknowledges that there is good collaboration among regulators already underway (e.g., the working group on psychotherapy). Overall, we support the use of transitional councils and advisory committees as a way for regulatory bodies to share knowledge, experience and expertise.

Some of HPRAC's recommendations appear to emphasize the performance of individual controlled act procedures over the collective competencies and knowledge base of the profession. Nursing practice is more than a collection of discrete controlled acts. Regulatory processes must reflect the full scope of practice and support the application of nursing knowledge, skill and judgement that includes, but is not limited to, the performance of controlled acts.

This submission provides CNO's response to two of the five recommendations made by HPRAC that we determined to be most relevant to nursing practice in Ontario, specifically: recommendations # 2 and 4.

ACUPUNCTURE: RECOMMENDATION #2

That the Minister direct the College of Chiropractors of Ontario, the College of Chiropractors of Ontario, the College of Nurses of Ontario, the College of Occupational Therapists of Ontario, the College of Physiotherapists of Ontario, the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario, the Board of Directors of Drugless Therapy (Naturopathy) and the Royal College of Dental Surgeons of Ontario to establish a continuing interprofessional Advisory Committee on Acupuncture, the mandate of which is to provide advice to the Colleges, and to promote the development, either jointly or individually of:

- a) High minimum qualifications for the practice of acupuncture;**
- b) General standards of practice for acupuncture;**
- c) Quality assurance and continuing competence programs for acupuncture;**
- d) Educational qualifications and equivalency standards for members to practise acupuncture; and**
- e) Any other matter relevant to the practice of acupuncture.**

CNO supports the need for a common understanding and interpretation of controlled act procedures among the professions with access to a specific controlled act. However, we are concerned that the advisory committee mandate described above delves to a level of detail that is unnecessary. While CNO does identify the educational qualifications and quality assurance requirements for nursing practice in Ontario, we do not typically prescribe specific requirements

¹ Nurse Practitioners, Registered Nurses and Registered Practical Nurses.

for controlled act procedures². We believe the most appropriate role for this advisory committee is to identify the common competencies associated with acupuncture (e.g., infection prevention / control techniques). Once competencies are identified, the various colleges can develop their respective regulatory processes (e.g., practice standards, continuing competence requirements, etc) accordingly.

PYSCHOTHERAPY: RECOMMENDATION #4

That the use of the title “psychotherapist” should be restricted to members of the College of Psychotherapists and Registered Mental Health Therapists of Ontario, the College of Psychologists of Ontario, the College of Physicians and Surgeons of Ontario, the College of Occupational Therapists of Ontario, the College of Social Workers and Social Service Workers, and the College of Nurses of Ontario who have the controlled act of psychotherapy within the scope of their practice.

CNO does not support HPRAC’s recommendation to permit members of Colleges who have access to the controlled act of ‘performing psychotherapy’ to use the protected title “psychotherapist”. Title protection is not typically associated with a profession’s access to, or performance of, a specific controlled act.

Nurses who perform psychotherapy are *practising nursing* and are accountable for complying with all of CNO’s practice standards and guidelines – not just those that may be associated with psychotherapy. CNO is not supportive of nurses using the psychotherapist title unless they are also members of the College of Psychotherapists and Registered Mental Health Therapists. HPRAC’s recommendation has the potential to create public confusion about *who* is providing care and to *which* regulatory college the health professional is accountable.

² When proclaimed, acupuncture will simply be one, of countless other, controlled act procedures authorized to nurses.