

September 22, 2020

Hon. Doug Ford, Premier  
Legislative Building, Queen's Park  
Toronto, ON M7A 1A1  
[doug.fordco@pc.ola.org](mailto:doug.fordco@pc.ola.org)

Hon. Christine Elliott, Minister of Health  
5<sup>th</sup> floor, 777 Bay St.  
Toronto, ON M7A 2J3  
[christine.elliott@pc.ola.org](mailto:christine.elliott@pc.ola.org)

Dear Premier Ford and Minister Elliott,

**Re: Expanding RPN scope of practice**

The Registered Nurses' Association of Ontario (RNAO) and the Ontario Nurses' Association (ONA), out of grave concern for protecting public safety and in the best interests of Ontarians, are urging you to delay any further action on the September 17, 2020 College of Nurses of Ontario (CNO) Council decision to approve the regulation for registered practical nurse (RPN) scope of practice expansion. We recommend a delay until after COVID-19 and following deeper consultations by the Health Professions Regulatory Advisory Council (HPRAC).

Our recommendation comes after repeated attempts by RNAO and ONA to individually<sup>1</sup> share with CNO's executive our opposition on this regulatory change, and to question CNO's rationale for such a change. Most concerning is that our joint RNAO/ONA letter to the CNO executive and its Council<sup>2</sup> – requesting merely a delay of the decision until after COVID-19 – was not even disclosed by the CNO CEO and the CNO president to its Council. This is a notable breach of transparency.

Premier and minister, the changes made by the CNO on September 17, 2020 are far-reaching and impact the safety of Ontarians, nursing practice and the health system at large. Given the unprecedented circumstances of the COVID-19 pandemic and its effect on the nursing profession and the public, we now urge you in the strongest possible terms to defer this matter until after COVID-19 and following a review and consultations by HPRAC.

Registered nurses (RN), RPNs and nurse practitioners (NP) all have a critical role to play in advancing a strengthened health system that safely meets the needs of all Ontarians. RNAO and ONA very much value the important contributions of RPNs. However, scope of practice limitations guided by entry-level education is a critical component of self-regulation. These limitations exist to protect the public. This is why this major entry-level regulatory change to RPN scope of practice must be referred to HPRAC.

Much to our alarm, CNO Council passed the motion to finalize and submit the proposed RPN scope of practice regulation to government, despite the concerns and disapproval that was evident through the summary of feedback to a CNO survey that had thousands of respondents, from nurses in all categories to members of the public. Those survey **results show 86% of members of the public who responded did not support the change.**<sup>3</sup> In addition, and as noted in the media, this major regulatory change to RPN scope proceeded to a CNO Council decision in the midst of a cyber security breach, which occurred September 8 and was not

disclosed until 10 days later.<sup>4</sup> CNO Council knew that nurses would be stressed to learn of the cyber security breach and ought to have also known that adding news about a major regulatory change would only increase their level of stress. All of this is happening during a major pandemic requiring nurses' full attention to care for and protect the public.


The decision to approve a regulation change for the RPN scope of practice – a change that will jeopardize the safety of the public and render the RN and RPN scope of practice identical – did not follow due process. The CNO blatantly disregarded the [joint letter from RNAO and ONA](#) sent on September 16, 2020, urging the immediate postponement of any decision on RPN scope expansion until post-COVID-19. In juxtaposition to this blatant disregard, a letter CNO received from WeRPN in support of the proposed CNO regulation change was shared with the CNO Council.

RNAO and ONA attended the CNO Council meetings as observers. Our observations from the CNO Council meetings on June 3, 2020, and again on September 17, 2020 have left us with critical concerns about our nursing regulatory body and its capacity to protect the public. RNAO and ONA believe CNO Council's decision to approve the regulatory change that allows RPNs the authority to initiate and perform four intrusive procedures – all referred to as *controlled acts* under Ontario legislation – in the absence of an order from an appropriate regulated health professional was made in the **absence of evidence** regarding safety as well as the need for this scope of practice change. The decision was also made with complete disregard for the very different educational preparation of a two-year diploma for an RPN and the four-year university degree for an RN.

As Ontario enters a second wave of the COVID-19 pandemic, RNs, RPNs and NPs continue to work tirelessly to protect the health and safety of our communities. We must not advance regulatory changes that will further disrupt the already unstable health and economic systems, and that will only serve to increase stress and instability. The changes recommended to you by the CNO are not a matter of urgent need and should not be rushed without fulsome discussion and transparency.

Premier Ford and Minister Elliott, we are calling on you, on behalf of more than 6,000 signatories on our recent [action alert](#), to delay any further progression with RPN scope of practice expansion until after COVID-19. Furthermore, we ask that you refer this matter to HPRAC.

Warm regards,



Morgan Hoffarth, RN, MScN  
President, RNAO



Vicki McKenna, RN  
President, ONA



Doris Grinspun, RN, MSN, PhD,  
LLD(hon), Dr(hc), FAAN, O.ONT.  
Chief Executive Officer, RNAO



Beverly Mathers, RN, BA, MA  
Chief Executive Officer, ONA

CC: Hon. Merrilee Fullerton, Minister of Long-Term Care  
Helen Angus, Deputy Minister of Health  
Richard Steele, Deputy Minister of Long-Term Care  
Matthew Anderson, President & Chief Executive Officer, Ontario Health  
Thomas Corcoran, Chair, Health Professions Regulatory Advisory Council  
Sandra Robinson, CNO Council President  
Anne Coghlan, Executive Director and Chief Executive Officer, CNO  
CNO Council

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<sup>1</sup> College of Nurses' of Ontario (CNO). (2020, June). *Council briefing package: Attachment 4 and 5 letters from ONA and RNAO*, p.62-69. Retrieved from <http://www.cno.org/globalassets/1-whatiscno/council/meetings/2020/council-agenda-0620.pdf>

<sup>2</sup> Registered Nurses' Association of Ontario (RNAO) & Ontario Nurses' Association (ONA). (2020, September 16). *RNAO and ONA letter to CNO re: Expanding RPN scope of practice*. Retrieved from [https://rnao.ca/sites/rnao-ca/files/Joint\\_RNAO\\_and\\_ONA\\_Letter\\_to\\_CNO-Sept\\_16.pdf](https://rnao.ca/sites/rnao-ca/files/Joint_RNAO_and_ONA_Letter_to_CNO-Sept_16.pdf)

<sup>3</sup> CNO. (2020, June). *Council briefing package*, p. 50-54. Retrieved from <http://www.cno.org/globalassets/1-whatiscno/council/meetings/2020/council-agenda-0620.pdf>

<sup>4</sup> Perkel, C. (2020, Sept 18). Ontario nurses' college hit by ransomware attack; personal data at risk. *The Canadian Press*. Retrieved from <https://www.thestar.com/news/canada/2020/09/18/ontario-nurses-college-hit-by-ransomware-attack-personal-data-at-risk.html>