

**ONTARIO NURSES' ASSOCIATION**

**SUBMISSION**

**ON**

**Proposed Regulatory Amendments Under the *Medicine Act, 1991* to Allow Out-of-Province Regulated Health Professionals to Temporarily Practice in Ontario Without Registration with an Ontario Regulatory College**

**July 7, 2023**



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The Ontario Nurses' Association (ONA) is the union representing 68,000 registered nurses and health-care professionals across Ontario and in every sector of health care. Our membership includes thousands of front-line nurses and health-care professionals in the long-term care (LTC) sector.

For years, ONA has been calling attention to the severe nursing shortage and calling on the government to develop a comprehensive retention and recruitment strategy to address the shortage of RNs. Per capita, Ontario has the fewest RNs of any province and will need to hire net 24,000 RNs just to meet the Canadian average RN-to-population ratio. This does not account for regular replacement of retiring nurses or those who are otherwise leaving the profession.

The longer the government delays working with front-line nurses and their union to develop and implement a retention and recruitment strategy, the more dire the situation will become as front-line nurses continue to burn out and leave the profession prematurely, through early retirement or changes in career. It is essential that the government implement policies that address the root causes of the nursing shortage – namely uncompetitive wages and untenable working conditions that are depleting the workforce.

When compared to RNs across Canada, Ontario nurses are on average paid less per hour than their counterparts in all but three other provinces or territories as per the federal Job Bank data. Yet housing costs in Ontario are eclipsed only by those in British Columbia. Given this data, it is difficult to conceive of how the government plans to draw high volumes of out-of-province nurses to relocate to Ontario, as purported by this program.

So-called 'as-of-right' licensing for nurses will do very little to address the nursing crisis and we continue to urge the government to work with nurses to improve their working conditions and develop a *real* retention and recruitment strategy.

In addition, ONA fundamentally opposes the precedent of allowing government to determine who may work as a registered nurse, registered practical nurse, or nurse in the extended class. This role is reserved for the College of Nurses of Ontario as our professional body, which ensures all nurses licensed in Ontario have the requisite education, skills, and knowledge to provide care. It is inappropriate and reckless for the government to take on this responsibility and will compromise patient safety.

While we disagree wholeheartedly with this approach to regulatory oversight of the nursing profession, we do submit our recommendations to improve the regulations where possible.

There should be a mechanism in these regulations that compels health-care agencies under this exemption (hospitals and long-term care homes), to validate the credentials of the out-of-province nurse and certify with the College of Nurses of Ontario (CNO) that the nurse has applied for CNO registration.

The regulations do not establish any mechanism for out-of-province nurses or their Ontario employers to demonstrate a nurse meets the qualifications established in the regulations. The regulations should stipulate what documentation is required, to whom the documentation must be presented, and which body is responsible for maintaining records of the documentation.

Ultimately, responsibility for determining who is fit to practice as a nurse in Ontario should continue to rest with the CNO, and the government should occupy itself not with taking on the work of the CNO but instead with developing a real retention and recruitment plan that has an actual chance of increasing the number of nurses practicing in Ontario. It is time to put aside the gimmicks and work with front-line nurses and their union to ensure all Ontarians have a nurse at the bedside when they need one.