



October 25, 2024

Hon. Sylvia Jones
Deputy Premier and Minister of Health
Health Workforce Regulatory Oversight Branch
Nursing and Professional Practice Division
10th Floor, 438 University Avenue
Toronto, ON. M7A 1N3

Dear Minister Jones,

Re: Proposal 24-HLTC022 - Consultation on potential changes to scopes of practice for nurse practitioners and registered nurses

I am writing to you on behalf of the 68,000 registered nurses (RNs), health-care professionals, and over 18,000 nursing student affiliates represented by the Ontario Nurses' Association (ONA). ONA's membership, which includes RNs, nurse practitioners (NPs), and health-care professionals providing care and services in hospitals, long-term care facilities, public health units, the community, and clinics across Ontario, is dedicated to advocating for improvements in timely access to health care for all. ONA welcomes this opportunity to provide input for the Ministry of Health's consultation on potential changes to nursing scope of practice.

Proposed Scope Expansion for NPs

ONA supports the proposed expansion of the NPs' scope of practice, including allowing NPs to order and apply a defibrillator, allowing NPs to order and apply cardiac pacemaker therapy, allowing NPs to order and perform electrocoagulation as well as allowing NPs to certify death in all circumstances. We have also provided a separate submission in support of the proposal to allow NPs to complete and sign mandatory blood testing forms. Read it [here](#).

NPs already possess the education, competence, and quality assessment skills to perform the initial assessment in determining the patient or client's needs. The Canadian Federation of Nurses Unions explains that the NP role combines clinical diagnostic and therapeutic knowledge that emphasize health promotion.¹ NPs are nurses with additional graduate or post-graduate education and clinical practice experience who specialize in both nursing and medical skills. In addition to their four years of baccalaureate nursing education, they receive two years of NP education, typically at the master's level, and a minimum of two years of full-time clinical experience. As a regulated health-care profession, NPs are legally responsible for their own practice and clinical judgment. Their practice includes a strong emphasis on prevention and wellness. Within their current scope, NPs already diagnose, order and interpret diagnostic tests, and prescribe medication and other treatment. Therefore, ONA's position is that NPs are the most appropriate care provider to expand their scope of practice with many of the

proposed scope expansions in this consultation. For this reason, we also question the Ministry of Health as to why the expansion is so narrow. Are other expansions being considered for NPs to assist with the client's access to care and positive health outcomes?

Except for education and training, the proposals outlined for this consultation would require little effort to action. If this expansion is approved, the College of Nurses of Ontario's (CNO) Scope of Practice standard three key factors would apply: authority, context, and competence. Nursing is a regulated profession, and the scope of practice is determined by the regulations under the *Regulated Health Professions Act, 1991*, and the *Nursing Act, 1991*.ⁱⁱ These legislative frameworks allow nurses to exercise their authority to perform clearly defined tasks when providing care to an individual.ⁱⁱⁱ Secondly, nurses are trained to assess the context in which they perform these clearly defined tasks to ensure they have the support, and the resources required to provide appropriate care.^{iv} Similarly, nurses adhere to competence standards that evolve with time. Nurses continuously learn and hone their critical-thinking, decision-making and leadership skills to achieve competence while performing the defined tasks.^v These factors ensure public safety and quality care for all Ontarians. NPs practice within these standards currently.

The proposed changes to the NP scope of practice would help to provide a timely response within many health-care sectors, addressing the growing need for health-care services, especially within underserved populations, communities and settings. Currently, 2.5 million Ontarians do not have access to primary care.^{vi} It is imperative that we utilize roles within interdisciplinary health-care teams, such as NPs, who already possess a strong knowledge base, judgement skills and practice across all sectors of health care. The potential positive patient and client outcomes from these changes cannot be overstated. However, the Ministry of Health must ensure that action is taken to address NP remuneration. The 2023 market salary review produced by Eckler on behalf of ten community health organizations recommended an increase in wages of 25.7 per cent for RNs who work in primary care, as well as a 16.8 per cent increase for NPs.^{vii} Wage parity across all health sectors is not only necessary to address retention and recruitment challenges but also to fairly compensate for the specialized care provided by NPs and RNs across all sectors. ONA urges the government to act on these recommendations.

Proposed Scope Expansions for RNs

ONA is supportive of the proposal to allow RNs to certify death when the death has been expected. The proposal has the potential to bring significant relief to patient populations across all health-care sectors in the province. In the long-term care (LTC) sector, the current situation, where nurses and families must wait for either an NP or physician to come in when the death is expected, can be emotionally straining. Sometimes this does not happen until the following day. The proposed change could alleviate some of this strain. If supported in the hospital settings, it would free up the NPs and physicians to focus on the many other competing priorities and, as noted in LTC sector, decrease the additional waiting the family has to experience. Underserved rural areas would also certainly benefit from this scope of practice expansion for RNs.

Additionally, RNs currently practice within the CNO standards to ensure client safety. To maintain their current standards such as the Scope of Practice standard set in July 2023, or

Therapeutic Nurse-Client Relationship, revised in 2006, RNs would only require minimal education and training to complete a Medical Certificate of Death. Therefore, this proposal has no increased risk to client outcomes. RNs currently provide palliative and end-of-life care. Their involvement with this patient population means they are attuned to the complexities and possess the knowledge, skill, and judgement to further their scope.

In conclusion, the proposed nursing scope expansions are positive steps towards improving patient, client and resident outcomes. ONA recommends additional discussions and consideration be given to further expansions, especially to the NP scope, to include but not limited to the authority to order specific scans or complete forms under *the Mental Health Act*. This would assist with providing quality, safe client and patient care in a timely manner, thus improving client outcomes and overall client and family satisfaction. ONA thanks the Ministry of Health for the opportunity to provide feedback.

Sincerely,



Erin Ariss, RN
President, Ontario Nurses' Association

ⁱ “Fulfilling Nurse Practitioners’ Untapped Potential in Canada’s Health Care System: Results from the CFNU Pan-Canadian Nurse Practitioner Retention and Recruitment Study.” *Canadian Federation of Nurses Unions*. June 2018. [CFNU_UntappedPotential-Final-EN.pdf \(nursesunions.ca\)](#)

ⁱⁱ [49041-scope-of-practice.pdf](#)

ⁱⁱⁱ Ibid.

^{iv} Ibid.

^v Ibid.

^{vi} [Number of Ontarians without family doctor reaches 2.5 million, college says | CBC News](#)

^{vii} Eckler. November 2023. Ontario Community Health Compensation Market Salary Review.