



October 23, 2024

Ministry 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 allow Nurse Practitioners to complete and sign the mandatory blood testing forms

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 scope of practice for NPs. We fully endorse the proposed change to empower NPs to complete and sign the mandatory blood testing forms for an applicant that needs to apply to have the blood of another person tested for specific infectious diseases if they have come into contact with their bodily fluids.

NPs through their education already possess excellent assessment skills, a sound knowledge base and superb judgement when providing care to their clients. If NPs are permitted this authority, they would only have to consider the context, i.e. environment, in which they practice and their individual competence related to this scope change to meet the three key factors, Authority, Context and Competency within their College of Nurses' Scope of Practice Standard set in July 2023. This proposal would take little effort to action as the NPs already possess the basic knowledge, skill and judgement and would only require training on the process and the form.

While ONA welcomes this specific scope of practice change, the Ministry of Health must clarify how this change will assist with overall access to care. Ontarians deserve transparency regarding the number of visits and the impacts on specific client populations resulting from this scope of practice change. ONA acknowledges that the proposed change will help expedite testing, thus reducing the turnaround time for results and allowing clients to receive earlier treatment if necessary, but we see this as just the beginning. This scope of practice change is

only a drop in the bucket when it comes to what NPs could be assisting with to increase access to care if their scope was further expanded. By doing so, NPs can provide a more fulsome point of care when needed, thus offering a promising future for a more efficient and effective health-care system.

In conclusion, ONA supports this proposal and thanks the Ministry of Health for the opportunity to provide feedback. By October 25, ONA will also offer input on the remaining potential changes to the scopes of practice for NPs and RNs included in the Ministry's latest consultation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erin Ariss', with a stylized flourish at the end.

Erin Ariss, RN
President, Ontario Nurses' Association