



May 30, 2024

Hon. Sylvia Jones  
Minister of Health

ATTN: Health Workforce Regulatory Oversight Branch  
Nursing and Professional Practice Division  
438 University Avenue, 10th Floor  
Toronto, ON. M5G 2K8

Dear Minister Jones,

**Re: College of Nurses of Ontario: General Regulation 275/94 made under the Nursing Act, 1991**

I am writing to you on behalf of the 68,000 registered nurses (RN), health-care professionals, and over 18,000 nursing student affiliates represented by the Ontario Nurses' Association (ONA). Our members work in hospitals, long-term care facilities, public health units, the community, and clinics across Ontario.

ONA is proud to have a diverse membership, which includes internationally educated nurses (IENs). We recognize that IENs demonstrate remarkable dedication and commitment while facing formidable barriers to practice such as immigration status, discrimination and long processing times that delay their return to the profession by making professional registration difficult, time-consuming, and financially burdensome. We want to be full partners, working alongside the government and other key stakeholders, in making changes as we recognize that IENs play a critical role in strengthening the health-care workforce in Ontario.

In our opinion submitted to the College of Nurses of Ontario (CNO) on November 16, 2023, we expressed concerns about the CNO's proposed amendments to O. Reg 275/94 under the Nursing Act, 1991. We want to reiterate those concerns. The CNO's proposal to accept RN applicants who have a baccalaureate degree and registered practical nurse (RPN) applicants who have a diploma as meeting the education requirement without any additional assessment if the program is approved or recognized in the jurisdiction in which it was taken as preparing them for practice as an RN or RPN respectively is a decision that could potentially compromise public safety. There must be an evaluation of education standards as certain nursing programs may be comparable to Canadian programs, and others may not.

Additionally, the CNO must reconsider the proposal, stating that applicants must complete a course to support their integration into the Canadian health-care system unless they qualify for an exemption outlined in the proposed regulation. We believe completing a course to support the integration of IENs into the Canadian health-care system is essential, just as we believe as

a union that access to a full and flexible workplace environment that is not just culturally safe but also free from discrimination is also essential.

Recognizing the need to give IENs the respect they deserve and act on thoughtful strategies to support their integration, we emphasize the utmost importance of a comprehensive, multi-stakeholder approach. This approach involves identifying all barriers and proposing solutions by engaging with relevant partners, including the Ministry of Health, the CNO, employers, health care unions, health education faculties, immigrant service delivery agencies that support IENs, and consulting directly with IENs themselves.

Through the Canadian Federation of Nurses Unions, nurses have been advocating for a permanent and accessible program that remunerates the costs incurred by IENs for examinations, application, and registration fees, financial support for preceptors, scaling up of bridging pilots, and the expansion of successful bridging pilots, including in long-term care facilities, community health, and home care settings, to address the underutilization of IENs. These measures are crucial to successfully integrating IENs into Ontario's health-care system.

ONA thanks the Ministry of Health for the opportunity to provide feedback.

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