



Registered Nurses' Association of Ontario  
L'Association des infirmières et infirmiers  
autorisés de l'Ontario

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**RE: Public register language for nurse practitioners (NP) who do not have authority to prescribe controlled substances**

Dear Anne,

Thank you for the opportunity to provide feedback on proposed changes to the information displayed on CNO's public register, *Find a Nurse*, when an NP does not have the authority to prescribe controlled substances.

As you know, the Registered Nurses' Association of Ontario (RNAO) has been a long-standing advocate of the need to expand NPs' scope of practice to include narcotics. Extending NPs' authority to prescribe controlled substances is a positive change that improves access to health care for patients across the province.

RNAO supports the principle of making information available to the public about whether an individual NP has met the education requirement as defined in the regulation.<sup>1</sup> This is important to support public safety and transparency. Yet we are concerned – and have heard from many of RNAO's members – that the current wording on the public register for NPs who do not have the authority to prescribe controlled substances, "Entitled to practice with restrictions",<sup>2</sup> is easily misinterpreted.

The inability of an NP to prescribe controlled substances is not a 'restriction' because prescribing controlled substances is not a mandatory part of NP scope of practice. An NP who chooses not to include prescribing controlled substances as part of their practice should not be labeled with the negative and misleading connotation that 'restrictions' has, which suggests the NP has done something wrong or has been the recipient of disciplinary action from the CNO.

RNAO is very pleased that CNO is considering alternative language to display on *Find a Nurse*. RNAO's feedback on the questions given to us by Erin Tilley, Strategy Consultant at CNO, is as follows:

1. Which of the following statuses do you think is most appropriate?

- *Entitled to practice but cannot prescribe controlled substances until specialized education is completed*
- *Entitled to practice: cannot prescribe controlled substances until education is completed*
- *Entitled to practice but cannot prescribe controlled substances until required education is completed*

Each of the three statuses proposed by CNO focus on the negative; that is, NPs who have not completed courses that give them the authority to prescribe controlled substances. RNAO argues this is misleading to the public, as it is not clear that the controlled substances education is an additional, optional course for NPs. Using phrasing like “cannot prescribe ... until education is completed” insinuates deficiencies in education and practice for those NPs who choose not to prescribe controlled substances.

It is a clearer, more positive approach to identify which NPs *have* completed the additional (optional) training. All NPs should have a status of “Entitled to practice”. RNAO recommends that those NPs who have completed the additional training have an additional status notation.

**Recommendation 1. Use the following wording for NPs who have completed courses that given them the authority to prescribe controlled substances: *Entitled to practice. Authorized to prescribe controlled substances.***

2. ... we are also exploring a description of this status on Find a Nurse. Is the following description clear?

*“The nurse is a current member of CNO. Ontario NPs have the authority to prescribe controlled substances if they successfully completed Council-approved controlled substances education. These include standalone courses and NP programs that have integrated required controlled substances content into their curriculum. NPs who choose not to complete controlled substances education (or who are not graduates of programs with integrated content) are not authorized to prescribe controlled substances, as reflected on Find a Nurse. For more information on controlled substances and what competencies are taught in controlled substances education, visit the NPs and Prescribing Controlled Substances page.”*

As already noted, obtaining the authority to prescribe controlled substances is not required for NPs to continue to practice according to CNO standards. It is an additional, optional course. This is not made clear in the proposed description. RNAO recommends that this be included in the description.

**Recommendation 2. Include messaging about the “optional” nature of narcotics prescribing because it is not a required, mandatory standard for NP practice, by incorporating the following statement into the description: *The authority to prescribe***

***controlled substances is an optional practice standard. NPs are not required to obtain this authority to continue to practice safely and to full scope according to CNO standards.***

The majority of NPs in Ontario have completed the required education to prescribe controlled substances, but there are NPs who have not. Some NPs have made an intentional decision not to pursue the additional coursework required to prescribe controlled substances as it is not pertinent to their individual circumstances or practice area. It is not fair to apply negative labels, when prescribing controlled substances is not a required part of NP scope of practice.

Anne, we look forward to continuing to work with you on this and other issues facing Ontario's NPs.

Warm regards,



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

CC: Erin Tilley, Strategy Consultant, College of Nurses of Ontario  
Larissa Gadsby, NP; Mae Katt, NP: Nurse Practitioner Interest Group (NPIG) Co-chairs  
Dr. Bob Bell, Deputy Minister of Health and Long-Term Care  
Denise Cole, ADM, Health Workforce Planning and Regulatory Affairs Division  
Dr. Michelle Acorn, Provincial Chief Nursing Officer

## **References:**

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<sup>1</sup> RNAO. (2017). Letter to CNO re, nurse practitioners' authority to prescribe controlled substances. Retrieved from [http://rnao.ca/sites/rnao-ca/files/Feedback\\_to\\_CNO\\_re\\_NP\\_authority\\_to\\_prescribe\\_controlled\\_substances.pdf](http://rnao.ca/sites/rnao-ca/files/Feedback_to_CNO_re_NP_authority_to_prescribe_controlled_substances.pdf).

<sup>2</sup> CNO. (2018). Nurse practitioners. Retrieved from <http://www.cno.org/en/learn-about-standards-guidelines/educational-tools/nurse-practitioners/>.