



**RNAO feedback to the College of
Nurses of Ontario on excerpts
from the *Scope of Practice* and
Medication practice standards**

July 22, 2026



The Registered Nurses' Association of Ontario (RNAO) is the professional association representing more than 57,250 registered nurses, nurse practitioners and nursing students in all roles and sectors across Ontario. Since 1925, RNAO has advocated for healthy public policy, promoted excellence in nursing practice, increased nurses' contribution to shaping the health system, and influenced decisions that affect nurses and the public we serve.

Introduction

RNAO welcomes the opportunity to provide feedback to the College of Nurses of Ontario (CNO) on the proposed excerpts to the *Scope of Practice* and *Medication* practice standards. Our analysis of the practice standard addresses key components of the revisions and identifies gaps.

1. Medication

RNAO presents a key facilitator identified in the proposed excerpt in the table below.

Key facilitator	RNAO's rationale
1. Direction to CNO Aesthetic Services practice guideline The excerpt directs readers to CNO's <i>Aesthetic Services</i> practice guideline for additional information on aesthetic services [1].	RNAO appreciates the inclusion of a reference to CNO's <i>Aesthetic Services</i> practice guideline, as it offers more detailed guidance on aesthetic nursing practice. RNAO further recommends that CNO directs readers to the <i>Scope of Practice</i> standard, which provides additional guidance on delegation and important context regarding nurses' roles, responsibilities and accountabilities in relation to the proposed excerpts [2].

Overall, RNAO finds the proposed excerpt to be clear. We ask that further consideration be given to the following identifies gap:

Identified gap	RNAO's rationale
1. Define the term direct order The term "direct order" is not defined in either the excerpt or the current version of the practice standard [1,3].	The CNO must define the term "direct order" to ensure clarity and consistent interpretation within the practice standard.

2. Scope of Practice

RNAO presents a key facilitator identified in the proposed excerpt in the table below.

Key facilitator	RNAO's rationale
1. Accessibility of legislative information The practice standard provides an excerpt from O. Reg 275/94 of the Nursing Act on page 4, outlining the relevant legislative requirements [2,4].	RNAO supports the inclusion of this information, as it provides nurses with important legislative context, promotes consistent interpretation and application of regulatory requirements, and reduces the need for nurses to independently locate and interpret the relevant legislation. Incorporating this information into the practice standard enhances accessibility and supports informed nursing practice.

RNAO outlines gaps in the proposed excerpts as follows:

Identified gaps	RNAO's rationale
1. Equity-informed language The term "client" is used throughout the excerpts and remaining practice standard [2,5].	The term "people" should be used in place of "client," "person," and "patient," -- recognizing individuals first as people rather than solely as recipients of services or care, emphasizing an equity and person-centred approach [6]. RNAO urges CNO to reference the association's People-Centred Care best practice guideline to enhance the integration of equity-informed language within the draft guideline. Please see the note on terminology in Table 1 on page 6.
2. Clarify responsibility The statement on page 5 of the practice standard, "actively assess whether delegation is appropriate or if the nurse should be performing the controlled act based on the client's needs," is unclear because it does not specify which nurse is being referred to [2].	RNAO strongly recommends that CNO specify whether the "nurse" refers to the delegator or the delegatee. The current wording may lead to inconsistent interpretation of roles and responsibilities.
3. Verifying registration status	RNAO strongly recommends that CNO clarify the process or identify available resources to

Identified gaps	RNAO's rationale
The statement on page 5 of the practice standard, "ensure the delegatee's registration is not revoked or suspended, or subject to terms, conditions or limitations restricting them from accepting delegation," does not provide direction on how a nurse is expected to verify this information [2].	support nurses in meeting this expectation. Without clear direction, nurses may be uncertain about how to verify a delegatee's registration status and any applicable terms, conditions or limitations.
4. Delegatee responsibilities Neither the excerpts nor the current version of the practice standard outlines the responsibilities of a delegatee when receiving a delegated controlled act [2,5].	RNAO strongly recommends that CNO clearly articulate the delegatee's roles and responsibilities to support safe and consistent practice when receiving a delegated order, and to clarify the competencies, accountabilities and decision-making responsibilities expected of the delegatee. For example, the practice standard should specify the delegatee's responsibilities.

Implementation supports

RNAO strongly recommends that the CNO develop companion implementation supports to enhance the usability and practical application of the proposed excerpts to both practice standards. Such supports could include:

- FAQs
- decision trees
- case scenarios tailored to different practice settings
- live education sessions and webinars for nurses practising in aesthetic settings

These resources would provide additional guidance to nurses currently providing aesthetic services and those considering entering aesthetic practice.

Conclusion

Thank you for the opportunity to provide feedback on the proposed excerpts to the *Scope of Practice* and *Medication* practice standards. We welcome the opportunity to meet with the CNO to address any questions.

References

1. College of Nurses of Ontario (CNO). Medication Practice Standard [Revised]. 2026.
2. College of Nurses of Ontario (CNO). Scope of Practice - Practice Standard [Revised]. 2026.
3. College of Nurses of Ontario (CNO). Medication Practice Standard [Internet]. Toronto, ON: College of Nurses of Ontario; 2025. Available from: https://www.cno.org/Assets/CNO/Documents/Standard-and-Learning/Practice-Standards/41007_medication.pdf
4. O. Reg. 275/94 GENERAL | ontario.ca [Internet]. [cited 2026 Jul 13]. Available from: <https://www.ontario.ca/laws/regulation/940275>
5. College of Nurses of Ontario (CNO). Scope of Practice - Practice Standard [Internet]. Toronto, ON: College of Nurses of Ontario; 2025. Available from: <https://www.cno.org/Assets/CNO/Documents/Standard-and-Learning/Practice-Standards/49041-scope-of-practice.pdf>
6. Registered Nurses' Association of Ontario (RNAO). People-Centred Care [Internet]. Toronto (ON): RNAO; 2025. Available from: <https://rnao.ca/media/9862/download>