Jan. 24, 2022

Anne Coghlan, Executive Director and Chief Executive Officer
College of Nurses of Ontario
101 Davenport Rd.
Toronto, ON M5R 3P1
ED@cnomail.org

Re: Internationally educated nurses (IEN)

Dear Anne,

We are writing to express our grave concerns about the speed with which the College of Nurses of Ontario (CNO) is processing applications for registration of internationally educated nurses (IEN). CNO's application process is taking up to seven years, sometimes more, to complete and has resulted in a pool of over 20,000 IEN applicants at a time when the province has a severe nursing shortage.

Anne, we are disappointed that even the onset of the pandemic seems not to have motivated the CNO to speed up its slow application process. The latest report from the Office of the Fairness Commissioner suggests that the pool of IENs applying for registration has grown while Ontario has plunged into a full-blown nursing human resource crisis.

Much could have – and still can be – done to expedite IEN applicants through the registration process and into our health system to join our now critically short nursing workforce as nurse practitioners (NP), registered nurses (RN) and registered practical nurses (RPN). The creation of temporary initiatives such as the Long-Term Care Staffing Pool Program will not accomplish this. Indeed, exploiting this pool of skilled applicants as a reserve of lesser-skilled labour in a time of crisis is unhelpful and shortsighted; it's a disservice to Ontarians in desperate need of nurses for both COVID- and non-COVID-related health care. IENs have a significant contribution to make to Ontario's health system in their capacity as nurses. The CNO should focus on expediting their applications for registration instead of facilitating their use in lower-skilled roles.

It is very worrisome that the CNO has allowed the pool of IEN applicants to grow to over 20,000 in the context of RN understaffing and, subsequently, a severe nursing shortage. RNAO is anxious to hear the CNO's logic for deeming IEN applicants fit for immediate service as personal support workers and unregulated care providers in critically short-staffed long-term care homes through the LTC Staffing Pool Program, but unworthy of reasonably expeditious application

assessments. The CNO's treatment of IENs, in the context of current nursing workforce demands and opportunities, is inconsistent with its mission of regulating nursing in the public interest and the human rights of IEN applicants.

RNAO is asking CNO to immediately amend the LTC Staffing Pool Program to incorporate a supervised practice model so that work done by IENs through the program is counted toward fulfilling the language proficiency and practice requirements of the registration application process. Such a model makes use of the skills and expertise of program participants and better serves the needs of participating long-term care homes and their residents in a time of critical nursing shortages.

Anne, as we requested on Jan. 17, 2022, we would appreciate a technical briefing on the Fairness Commissioner's report, CNO's IEN application process, and current CNO programming related to the IEN applicant pool. Further, we are eager to discuss solutions to reducing the IEN applicant pool and bolstering Ontario's nursing workforce with you. The IEN applicants for CNO registration have made Canada their home and seek to bring their expertise and skills to our health system at a moment of great need. We have an obligation to these applicants – and to our exhausted nursing workforce yearning for support and relief – to allow IENs to join Ontario's nursing workforce.

Warmest regards,

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

Morgan Hoffarth, RN, MScN
President

Cc:
Hon. Christine Elliott, Deputy Premier and Minister of Health
Matt Anderson, President and CEO, Ontario Health
Sandra Robinson, President, CNO Council
Council of the College of Nurses of Ontario
Irwin Glasberg, Fairness Commissioner
RNAO Board of Directors