



Nov. 14, 2023

Sylvie Crawford, Executive Director and Chief Executive Officer  
Patricia Sullivan, President  
College of Nurses of Ontario  
101 Davenport Rd.  
Toronto, Ont. M5R 3P1

Dear Sylvie and Patricia,

**Re: RNAO response to proposed "Registered Nurse Prescribing" practice standard**

The Registered Nurses' Association of Ontario (RNAO) welcomes the opportunity to provide feedback to the College of Nurses of Ontario (CNO) on the proposed "Registered Nurse (RN) Prescribing" practice standard.

Overall, RNAO believes this standard will provide RN prescribers with direction to safely and effectively carry out their responsibilities of assessing, diagnosing, prescribing certain medications, communicating diagnoses, and administering medication to treat approved non-complex medical conditions.

RNAO draws your attention to three issues that we would like the standard to address:

**1. Reference to communicating the diagnosis and medication prescribed to the interprofessional team**

Within the standard under **Authority**, there is reference to the obligation of the prescribing RN to communicate the diagnosis and medication prescribed to the patient and or caregiver. Missing, however, is an obligation to communicate the diagnosis and prescribed medication to another health care provider who may be the more direct care giver and be administering the prescribed medication. The obligation to do so is implied under **Safety** and in a subsection of **Collaboration, consultation and transfer of client care**. RNAO recommends that this obligation be clearly set out under **Authority**.

**2. Responsibilities of the workplace**

There is limited reference in the draft standard to the accountabilities related to the context of care. RNAO recommends that the draft standard adhere more closely to the ["Context" section of the CNO's Scope of Practice standard](#). That is, at minimum there should be reference to the shared accountability of employers and nurses for creating environments that support quality practice.

**3. Point-of-care testing**

RNAO recommends that point of care testing be included in the **Competency** section under the subsection of **Health Assessment** in the second paragraph as indicated below in italics.

RNs with prescribing authority:

obtain and consider the necessary information for the health assessment including relevant subjective and objective data *that could include point-of care testing results*

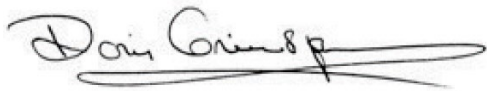
In sum, RNAO strongly supports the regulations authorizing RN prescribing, and applauds the CNO for its rapid response to government approval and for developing this practice standard. We offer these considerations to support you in ensuring public safety, and in enabling practice environments that maximize the benefits from this overdue expansion to RN scope of practice.

RNAO is committed to collaborating with the CNO to further amend the regulations under the Nursing Act to allow RNs to prescribe a broader range of medications for approved conditions and to order diagnostic tests.

RNAO asks CNO to ensure that RN prescribing becomes an entry to practice competency embedded in undergraduate nursing degree education by the end of 2024. The full societal benefit of RN-prescribing will come to fruition when every graduating RN – 5,000+ each year -- meets the competencies for RN prescribing. We are ready to work with the CNO and academic institutions to effect the required curriculum changes on RNAO's proposed timeline.

On behalf of RNAO and our 51,650 members strong – we thank you for the opportunity to respond to this exciting new standard, and look forward to working with you on this and any other areas.

Warm regards,



Doris Grinspun, RN, BScN, MSN, PhD, LLD(hon), Dr(hc), DHC, DHC, FAAN, FCAN, O.ONT.  
CEO, RNAO

Copy to:

CNO Council, c/o Council President Patricia Sullivan, RN

RNAO Board of Directors

Hon. Sylvia Jones, Deputy Premier and Minister of Health

Dr. Catherine Zahn, Deputy Minister of Health

Dr. Karima Velji, Assistant Deputy Minister and Chief of Nursing and Professional Practice