



**RNAO submission to College of
Nurse of Ontario regarding the
Documentation practice
standard**

April 7, 2025



The Registered Nurses’ Association of Ontario (RNAO) is the professional association representing more than 54,400 registered nurses (RN), nurse practitioners (NP) 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 early feedback to the College of Nurses of Ontario (CNO) on its current *Documentation* practice standard. Our analysis of the practice standard addresses:

- the key components of the standard, and
- identifying gaps and potential areas of risk within the standard.

Practice standards key components

RNAO analyzes key components we’ve identified within the practice standard in the following table.

Key components	RNAO’s rationale
<p>1. The practice standard outlines the importance of nursing documentation</p> <p>RNAO is pleased that the rationale for nursing documentation is clearly outlined on page 3 under the section “Why Document?”</p>	<p>Documentation can sometimes be seen as cumbersome, getting in the way of care provision. It is critical that nurses understand the importance of documentation to ensure that they are meeting their professional obligation to maintain a record of patients’ experiences in the health system (1,2).</p>
<p>2. Requirements to achieve the standards for documentation are outlined through indicators</p> <p>RNAO is pleased that the practice standard provides indicators related to communication, accountability and security to support decision-making.</p>	<p>Indicators are important for identifying criteria on how practice standards can be achieved through standardized practice (3). They can also be used as a method to measure nursing performance (3).</p> <p>RNAO finds the CNO’s breakdown of indicators for communication, accountability and security to be comprehensive in supporting decision-making.</p>

Gaps and potential areas of risk

RNAO has identified gaps and potential areas of risk that we have outlined in the table below.

Gaps and risks	RNAO's rationale
<p>1. Documentation of a diagnosis</p> <p>The practice standard excludes the need to document a diagnosis by advising that the following elements of the nursing process are documented: assessment, planning, implementation and evaluation.</p>	<p>The practice standard should include the requirement for nurses to document a diagnosis and key elements of the diagnostic process (e.g., ordering and interpreting diagnostic tests) in keeping with NP scope of practice, and the ability of RNs to diagnosis for the purpose of prescribing (4).</p> <p>It is important that nurses document a diagnosis and key elements of the diagnostic process to (5,6):</p> <ul style="list-style-type: none"> • maintain a record of judgment and the decision-making process, • enhance care continuity to improve outcomes, • prevent the ordering of duplicate tests and treatments, and • help communication efforts amongst health-care providers.
<p>2. Quality practice settings</p> <p>The practice standard does not clearly identify or outline the responsibility of the employer/organization's to help nurses meet their professional responsibility for documentation.</p>	<p>Health employers and organizations are responsible for ensuring that practice settings support nurses in meeting their professional responsibilities reducing the risk of CNO disciplinary action.</p> <p>RNAO recommends that the practice standard include language outlining that the employer/ organization has a responsibility to provide (7,8):</p> <ul style="list-style-type: none"> • adequate time for nurses to document, • policies and procedures consistent with CNO practice standards, • dedicated training time for all nurses, including temporary staff, during orientation and when adopting a new electronic health record (EHR) system or

Gaps and risks	RNAO’s rationale
	<p>digital technology that impacts documentation is being implemented</p> <p>In keeping with RNAO’s Clinical Practice in a Digital Environment (2024) best practice guideline (BPG), employers and organizations must also include nurses in the decision-making process when procuring, adopting and implementing EHR systems to minimize documentation burdens for nurses.</p>
<p>3. Provide clear language in indicators for collaborative care</p> <p>One indicator on page 7 – “clearly identifying the individual performing the assessment and/or intervention when documenting” – is vague (9)</p>	<p>Indicators must be clear to help nurses achieve CNO practice standards for documentation.</p> <p>RNAO recommends that the CNO provide criteria for “clearly” identifying an individual performing an assessment and/or intervention of the client during collaborative care (e.g. their name, professional designation, and date and time of the contact) – needed to accurately identify another health-care provider (2).</p>
<p>4. Provide more information or a link to support resources regarding the criteria for retaining health records</p> <p>One indicator on page 8 – “retaining health records for the period the organization’s policy and legislation stipulates when required by nurse’s role (for example, in independent practice)” – is vague.</p>	<p>Guidance for nurses that work in independent practice must be clear to support decision making processes. As “health information custodians” under the Personal Health Information Protection Act, self-employed nurses must follow best recordkeeping practices (10,11). RNAO recommends that the CNO provide a link to the <i>Independent Practice</i> guideline, which outlines practice standards on recordkeeping (10).</p>
<p>5. Include language that supports organizational policy and procedures</p> <p>One indicator on page 8 – “facilitating the rights of the client or substitute-decision maker to access, inspect and obtain a copy of health records...” – does not advise of the</p>	<p>Nurses are responsible for following the policies and procedures imposed by their employers in addition to the CNO practice standards. As health information custodians, organizations are responsible for ensuring that their policies and procedures comply with the</p>

Gaps and risks	RNAO's rationale
<p>nurse's requirement to also follow organizational policy and procedures when providing access to health records.</p>	<p>Personal Health Information Protection Act (11,12). Thus, RNAO recommends that the CNO include language advising nurses how to address areas where the organizational policies and procedures contradict CNO practice standards, as it relates to providing access to health records.</p>
<p>6. Advances in technology</p> <p>Documentation can take up a considerable amount of time creating a need for the implementation of artificial intelligence (AI) to streamline workflow (13,14).</p>	<p>Nurses have “ethical and legal responsibilities to maintain the confidentiality and privacy of client health information” and to ensure that documentation is clear and accurate (9,12).</p> <p>RNAO is aware that the CNO will be developing practice resources related to AI to support the decision-making processes. RNAO recommends that the CNO provide guidance on the use of automated transcription tools for required documentation, including reinforcing the importance of maintaining privacy when utilizing AI software. Recommendations must also outline the accountability and responsibility of organizations to support nurses with policies, procedures and the appropriate technology in keeping with RNAO's Clinical Practice in a Digital Environment (2024) BPG.</p>
<p>7. Entry-to-practice standards</p> <p>Nurses must have the knowledge and skills when entering the workforce to support care delivery using new and emerging technologies (15).</p>	<p>RNAO strongly recommends that the CNO work with academic partners for a thorough review and reform of schools of nursing curricula to integrate content on AI related to documentation and other technologies that impact care to ensure that nurses have the necessary knowledge and skills for entry-to-practice as per RNAO's Nursing and Compassionate Care in the Age of Artificial Intelligence report.</p>

Conclusion

Thank you for the opportunity to contribute early feedback on its current *Documentation* practice standard. RNAO looks forward to reviewing the new draft version of this practice standard later this year. We welcome the opportunity to meet with the CNO to address any questions or concerns.

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