



COLLEGE OF NURSES  
OF ONTARIO  
ORDRE DES INFIRMIÈRES  
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THE STANDARD OF CARE.  
L'EXCELLENCE EN SOINS

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October 14, 2014

**By E-mail : [dgrinspun@RNAO.ca](mailto:dgrinspun@RNAO.ca)**

Doris Grinspun, RN, MSN, PhD, LLD (hon), O.ONT.  
Chief Executive Officer  
Registered Nurses' Association of Ontario  
Toronto, ON

Dear ~~Ms~~ Grinspun:

**RE: Requiring an Order to Perform Psychotherapy**

Thank you for your letter regarding CNO Council's decision to require that RNs and RPNs obtain an order to perform the controlled act of psychotherapy.

Under the *Nursing Act, 1991*, RNs and RPNs are required to have an order for any controlled act unless there is an initiation regulation in place for the act. There are limited circumstances where an initiation regulation permits an RN or RPN to independently initiate a controlled act procedure. Initiation of controlled act procedures is further limited by other relevant legislation and workplace policies.

The wording of the proposed controlled act of psychotherapy shows that it is limited to clients who have a serious disorder with the potential for serious impairment. The controlled act is defined as:

*treating, by means of psychotherapy technique, delivered through a therapeutic relationship, an individual's serious disorder of thought, cognition, mood, emotional regulation, perception or memory that may seriously impair the individual's judgement, insight, behaviour, communication or social functioning.*<sup>1</sup>

When the proposed controlled act of psychotherapy becomes law, a client with such a serious health issue would also benefit from care provided by an NP or a physician. Either an NP or physician could provide an order in the context of the client's overall health management plan. The need for an order will ensure that a provider with the authority to diagnose supports the use of psychotherapy as the appropriate treatment.

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<sup>1</sup> Section 4, paragraph 4 under the *Nursing Act, 1991*.

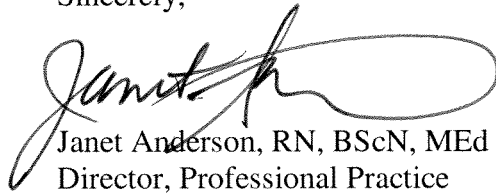
Psychotherapy is not part of nursing entry programs and it is not included in the Entry-to-Practice competencies. Rather, nurses seek additional education or practice experience in psychotherapy to gain the relevant competencies.

In September 2008, CNO conducted surveys and focus groups with RNs and RPNs who were performing psychotherapy as a part of their nursing practice. CNO learned that many of these nurses were performing activities that would likely not fall under the legislative definition of the controlled act of psychotherapy. Therefore, these nurses would not require an order to perform these activities when psychotherapy is proclaimed as a controlled act.

When this new controlled act is proclaimed, CNO will monitor practice and continue to assess feedback from the membership. The feedback will help to determine if an alternate regulatory mechanism is required to ensure public safety in relation to the controlled act of psychotherapy.

Again, thank you for your letter. Please contact Lori Adler, Manager, Practice Standards (ladler@cnmail.org or 416-963-7600) if you need any further information.

Sincerely,



Janet Anderson, RN, BScN, MEd  
Director, Professional Practice

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