



COLLEGE OF NURSES
OF ONTARIO
ORDRE DES INFIRMIÈRES
ET INFIRMIERS DE L'ONTARIO

THE STANDARD OF CARE.

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February 17, 2017

By E-mail

Doris Grinspun
Chief Executive Officer
Registered Nurses' Association of Ontario
158 Pearl Street
Toronto, ON M5H 1L3

Dear Doris:

Re: Request from RNAO that CNO pursue a regulation to enable RN initiation of psychotherapy

This letter is in response to your January 30, 2017 correspondence.

In anticipation of the controlled act of psychotherapy taking effect, in March 2014, CNO Council considered whether an initiation regulation was in the public interest. Council made the decision not to pursue an initiation regulation. In making this decision, Council considered information from consultations with members, what is taught in foundational nursing programs and the definition of the controlled acts as it relates to RN and RPN scope of practice.

Consultations with members indicates few nurses perform the controlled act of psychotherapy. Most nurses who participated in CNO's consultations were providing counselling or psychotherapy that didn't meet the threshold of the controlled act. Subject to sector specific legislation such as the *Public Hospitals Act*, these activities do not require an order. Furthermore, the majority of nurses reported working collaboratively with health care providers who have the authority to diagnose and write orders. The performance of psychotherapy is not taught in nursing entry programs. There are few controlled act procedures that can be initiated by RNs and RPNs and they reflect areas that are included in entry-to-practice programs.

The controlled act relates only to individuals who have a serious disorder with the potential for serious impairment. The requirement for an order ensures a health care provider with the authority to diagnose is involved in the care of the client, supporting an appropriate diagnosis and treatment plan.

CNO has been actively involved in an interprofessional working group comprised of regulatory colleges whose members will have access to the new controlled act. Together the colleges have developed a clarification document, *Understanding When Psychotherapy is the Controlled Act*. This document has been circulated for feedback to ensure that it will offer clarity with distinguishing between the controlled act of psychotherapy and psychotherapy that will remain in the public domain.
[http://www.cno.org/en/learn-about-standards-guidelines/magazines-newsletters/the-standard/january-2017/comment- psych/](http://www.cno.org/en/learn-about-standards-guidelines/magazines-newsletters/the-standard/january-2017/comment-psych/)

RNAO's letter stated that, "CNO is the only regulatory body to take this approach" (requiring an order). CNO is unique in that the *Nursing Act, 1991* requires that an order be provided unless an initiation regulation is in place. The other Colleges do not have this requirement embedded in their respective legislation.

CNO will monitor the implementation of the controlled act. Should there be any new evidence or information to suggest that an alternate regulatory mechanism is required to ensure public safety in relation to the controlled act of psychotherapy, this can be taken to Council in the future for their consideration.

Should you require further information, please contact Kevin McCarthy, Director of Strategy, at KMcCarthy@cnomail.org.

Sincerely,



Anne L. Coghlan, RN, MScN
Executive Director and CEO

ALC/am