

May 6, 2015

By E-mail

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

Dear Doris,

We are writing in response to your letter of April 13, 2015 regarding initiation of the controlled act of psychotherapy.

The College has shared the rationale for Council's decision related to the controlled act of psychotherapy in correspondence with you. On March 20 CNO staff met with you and other RNAO representatives to discuss why CNO took the approach that it did and how it differs from that of other colleges whose members will have access to the controlled act of psychotherapy.

Council made its decision not to pursue a regulation to allow initiation of the controlled act of psychotherapy after review of evidence presented by staff and a full and thoughtful public interest focused discussion. There is insufficient evidence that it would serve the public interest to allow RNs and RPNs to perform psychotherapy without an order.

Consultation completed by the College indicates that the majority of mental health services provided by nurses are not expected to fall within the controlled act of psychotherapy. The vast majority of nurses who responded to the consultation also identified that they are in a collaborative practice and securing an order would not be a barrier to meeting the needs of their patients.

In addition, initiation has little practical effect in Ontario's health system because most nurses work in sectors where legislation (e.g., Public Hospitals Act) requires client orders for treatments, such as psychotherapy.

A key foundational principle underlying Ontario health regulatory legislation is the separation of the regulatory body from the professional association. This is to allow the regulator to make decisions solely in the public interest and unencumbered by the interests of the members of the profession. For this reason, our Council makes its decisions based on evidence gathered by staff, which includes consultation feedback from stakeholders and members. Your concerns will be shared with Council through the existing mechanisms.

In all of our communications with you about this issue, we have expressed a willingness to monitor practice and assess feedback from membership regarding the implementation and impact of this policy direction on the public. Once the controlled act has been proclaimed and is in place for a period of time, we will be better able to assess the impact of Council's decision on nursing practice and the public.

Our unique and different mandates mean we cannot always agree on issues. We ask that RNAO respect that our Council has taken the action it believes is necessary and appropriate to protect the public interest.

Sincerely,



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



Angela Verrier, RPN
President