

Hon. Deb Matthews  
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*Speaking out for health. Speaking out for nursing.*

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March 28, 2011

Re: Proposed Regulations under the *Healing Arts Radiation Protection Act*, Proposal Number 11-HLTC011

Dear Minister,

The Registered Nurses' Association of Ontario (RNAO) welcomes the opportunity to comment on the proposed regulatory amendment under the *Healing Arts Radiation Protection Act (HARP Act)*. As the professional association for registered nurses in Ontario, RNAO's mandate is to advocate for healthy public policy and for the role of registered nurses including nurse practitioners, in enhancing the health of Ontarians. We appreciate the chance to present our views to the Ministry of Health and Long-Term Care regarding proposed regulations which would serve to enhance the safety of not only the patients who obtain Computed Tomography (CT) scans, but also the health professionals who order these scans and/or operate CT scanners.

RNAO strongly supports the proposed regulation's inclusion of Nurse Practitioners (NPs), alongside physicians and oral and maxillofacial surgeons as health professionals who are authorized to order CT scans.

Presently, under the X-ray Safety Code<sup>1</sup>, a "computerized transaxial tomography x-ray machine" is specifically excluded from the definition of a "diagnostic x-ray machine." Due to rapid technological developments and increases in CT use across the province, regulations under the *HARP Act* should clearly define what a CT scanner is, and recognize the fact that the radiation doses associated with CT examinations are higher than those associated with conventional x-rays. RNAO agrees that the regulation must also set out which regulated health professionals are authorized to order CT scans, and operate CT and dental CT scanners.

The 2007 HARP Commission Report<sup>2</sup> outlined several key recommendations concerning the regulation of CT scanners. These recommendations include:

- Developing a definition of "computerized axial tomography (CT) scanner or machine";
- Recognizing that radiation doses associated with CT examinations are higher than those associated with conventional x-ray examinations;
- Authorizing only those individuals with the appropriate clinical knowledge and safety training in radiation to prescribe or request CT examinations; and,

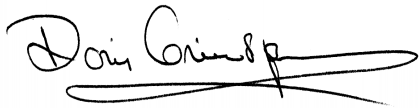
RNAO is very supportive of the government's goal as expressed in Bill 179<sup>3</sup> to enhance patient and client safety by increasing access to needed health care through expanding the scope of practice of health professionals within their education, knowledge and competencies. Elimination of barriers and limitations for nurse practitioners (NPs) to order computed (CT) tomography scans recognizes that NPs are key health professionals who provide high quality, client-centred primary and acute care. Authorizing NPs to order these specialized images will

not only increase the overall efficiency of NP assessment and treatment but will also reduce costs to the system as a whole.

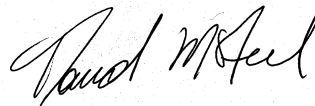
It was for the above reasons that the RNAO recommended to the Standing Committee on Social Policy on October 5, 2009, that nurse practitioners be granted legislated authority to order CT scans.<sup>4</sup>We are both pleased and proud to support the proposed regulation.

We would like to thank the Ministry for the opportunity to comment on this important regulation related to the *Healing Arts Radiation Protection Act*, and look forward to its expeditious approval by the Lieutenant Governor in Council. RNAO members remain unwavering in their commitment to work in collaboration with the Ministry and other health professions to ensure a health-care system that is focused on the best quality of care and best practices, consistent with the Excellent Care for All Strategy.

Warmest regards,



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Executive Director, RNAO



David McNeil, RN, BScN, MHA, CHE  
President, RNAO

## References

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<sup>1</sup> X-ray Safety Code, R.R.O.1990, Reg. 543.

<sup>2</sup> Lawson-Little, W, Cohen, J, Fyfe, J, Issabiglou, S. (2007). *Healing Arts Radiation Protection (HARP) Commission Report*. Government of Ontario: Toronto. Retrieved from: [http://www.health.gov.on.ca/english/public/pub/ministry\\_reports/harp/harp\\_report.pdf](http://www.health.gov.on.ca/english/public/pub/ministry_reports/harp/harp_report.pdf)

<sup>3</sup> *Regulated Health Professions Statute Law Amendment Act, 2009*. Retrieved from: [http://www.ontla.on.ca/bills/bills-files/39\\_Parliament/Session1/b179ra.pdf](http://www.ontla.on.ca/bills/bills-files/39_Parliament/Session1/b179ra.pdf)

<sup>4</sup>Registered Nurses' Association of Ontario. (2009). RNAO Submission to the Standing Committee on Social Policy: Bill 179, Regulated health Professions Law statute Amendment Act, 2009. Author. 28. Retrieved March 26, 2011 from: [http://www.rnao.org/Storage/61/5575\\_RNAO\\_Bill\\_179\\_written\\_submission.pdf](http://www.rnao.org/Storage/61/5575_RNAO_Bill_179_written_submission.pdf).