



Registered Nurses' Association of Ontario  
L'Association des infirmières et infirmiers  
autorisés de l'Ontario

Thomas Corcoran  
Chair  
Health Professions Regulatory Advisory Council (HPRAC)  
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Toronto, ON M5S 2S3  
Email : [HPRACSubmissions@ontario.ca](mailto:HPRACSubmissions@ontario.ca)

July 30, 2013

Dear Mr. Corcoran:

As the professional association representing registered nurses (RNs) working in all roles and sectors in Ontario, the Registered Nurses' Association of Ontario (RNAO) is pleased to respond to HPRAC's call for comments on the public consultation process regarding the exploration of regulating paramedics and EMAs under the *Regulated Health Professions Act (RHPA)*.

It is without question that Paramedics and EMAs are invaluable emergency responders whose trusted skill is responsible for saving and prolonging life. These brave women and men are to be commended for the tremendous courage and dedication they bring to their role as important members of the emergency response team. RNAO is concerned however, with the feedback -- albeit very limited -- that has been voiced in support of regulating these providers under the *RHPA*. It is RNAO's view that the current processes governing paramedics and EMAs can be leveraged and enhanced to provide the governance needed to adequately protect the public without establishing paramedicine as a distinct profession under the *RHPA*.

RNAO's foundational reason for not supporting at this time self-regulation for paramedics and EMAs stems from the fact that these providers do not possess a unique body of knowledge and scope of practice. In addition, paramedics and EMAs lack the high degree of autonomy that is required of those who seek self-regulation under the *RHPA*. Indeed, paramedics and EMAs are wholly dependent on emergency department physicians for delegation and supervision. As such, paramedics and EMAs do not constitute a stand-alone profession in Ontario.

RNAO strongly supports the statement made to HPRAC by the College of Physicians and Surgeons of Ontario, citing: "*The CPSO recognized that paramedics are highly trained to implement diagnostic treatment modalities in accordance with specific medical directives. Given the highly regulated framework within which paramedics are trained and currently operate, the CPSO is concerned that paramedics are not adequately positioned to adopt an independent scope of practice as a self-regulated profession under the RHPA*".

RNAO is also in agreement with the College of Nurses of Ontario in referencing "*critical gaps in the information provided*" through the application made by the Ontario Paramedic Association (OPA). In

addition, RNAO would like to highlight the great volume of concern that has been expressed by Health Sciences North, the Ontario Lead for Emergency Medicine, the Ontario Base Hospital Group Medical Advisory Committee, the Ontario Medical Association, the College of Physiotherapists of Ontario, and the Ontario Professional Fire Fighters Association -- all of whom do not support the current proposal to regulate paramedics/EMAs under the *RHPA*.

In summary, RNAO strongly suggests that HPRAC consider the consistent concerns expressed by stakeholders, and adopt a position that paramedics and EMAs should -- at this time -- not be regulated under the *RHPA*. and that the current method of regulation be leveraged and enhanced, where needed. RNAO would be happy to discuss our position and feedback regarding this matter in more detail.

Please feel free to contact Tim Lenartowych, Special Projects Manager – Office of the CEO ([tlenartowych@rnao.ca](mailto:tlenartowych@rnao.ca) | 416-408-5615) to initiate next steps.

Once again, we thank HPRAC for the opportunity to provide comment on the consultation that has occurred to date.

Warm regards

A handwritten signature in black ink that reads "Doris Grinspun". The signature is written in a cursive style with a long, horizontal flourish extending to the right.

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