



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

Mr. John Fraser
Parliamentary Assistant to the Minister of Health and Long-Term Care
11th Floor, Hepburn Block
80 Grosvenor Street
Toronto, ON M7A 2C4

February 03, 2017

RE: Request to intervene to enable RN initiation of psychotherapy

Dear John,

This letter is to request your intervention as we have come to an impasse with the College of Nurses of Ontario (CNO). Registered Nurses' Association of Ontario's (RNAO) believes that the CNO is failing RNs who have been providing safe and competent psychotherapy for years, by their decision to bar them from initiating this treatment. This is not the case for all the other regulatory bodies whose members practice psychotherapy. The CNO's action creates a barrier to access for Ontarians. If psychotherapy is proclaimed as a controlled act, RNs will be authorized to perform psychotherapy, and yet will be excluded from initiating treatment.

As you know from our meeting with you on March 24, 2015, and subsequent meeting at the RNAO home office on October 27, 2016, as well as our follow-up letter of November 11, 2016,¹ RNAO has urged CNO to reconsider its approach to psychotherapy initiation since 2014.^{2 3 4 5} The CNO has not provided a compelling rationale for its decision to allow treatment and not initiation. Instead, the CNO has refused to pursue an initiation regulation for psychotherapy as a controlled act as specified under Part Three of the *General* regulation under the *Nursing Act*.⁶ This will force RNs who have been safely performing psychotherapy for years, and in some cases decades, to obtain an order from a physician or nurse practitioner.

John, CNO is the only regulatory body to take this approach, unlike regulatory bodies for occupational therapists, registered psychotherapists, social workers, psychologists, and physicians. RNs who meet the conditions for initiating a controlled act, as with others who have the authority to practise psychotherapy, are best situated to assess their own knowledge, skill, and judgment, a specific client's condition, the appropriateness of intervention, and accept sole responsibility for initiation.⁷ Furthermore, established direct accountability for initiating and performing psychotherapy as a controlled act will best protect the public.

The window for action is closing. The deadline for feedback to the CNO and other regulators seeking input on their document, *Understanding When Psychotherapy is a Controlled Act*⁸ is February 7, 2017. It is March 31, 2017 for the College of Registered Psychotherapists of Ontario's⁹ grandparenting application. There is growing urgency among those RNs whose education and competency in psychotherapy is not being properly recognized by the CNO. Most importantly, too many Ontarians struggle daily to access high quality mental health and addiction

care, and the CNO imposed barriers would make it worse. We look forward to your critical intervention on this important matter.

Warm regards,



Doris Grinspun, RN, MSN, PhD, LLD(hon), O.ONT
Chief Executive Officer, RNAO

CC: Hon. Dr. Eric Hoskins, Minister of Health and Long-Term Care
Dr. Bob Bell, Deputy Minister of Health and Long-Term Care
Denise Cole, ADM, Health Workforce Planning & Regulatory Affairs Division

References

¹ Registered Nurses' Association of Ontario (2016). Letter to John Fraser: Follow up on meeting and RN psychotherapy. Toronto: Author. November 11, 2016. <http://rnao.ca/fr/policy/letters/RN-psychotherapy>

² Registered Nurses' Association of Ontario (2014). Letter to CNO: Requiring an order to perform psychotherapy. Toronto: Author. September 3, 2014 <http://rnao.ca/policy/letters/cno-re-requiring-order-perform-psychotherapy>

³ Registered Nurses' Association of Ontario (2014). Letter to CNO: Recommendation to rescind requirement to perform psychotherapy. November 25, 2014. Toronto: Author.
<http://rnao.ca/policy/letters/cno-rnao-recommendation-rescind-requirement-order-perform-psychotherapy>

⁴ Registered Nurses' Association of Ontario (2015). Letter to CNO: Initiation of RN psychotherapy. Toronto: Author. <http://rnao.ca/policy/letters/cno-initiation-rn-psychotherapy>

⁵ Registered Nurses' Association of Ontario (2017). Letter to CNO: Request that CNO pursue a regulation to enable RN initiation of psychotherapy. Toronto: Author. January 30, 2016.

⁶ *Nursing Act*, 1991. O. Reg. 275/94: General. <https://www.ontario.ca/laws/regulation/940275>

⁷ Registered Nurses' Association of Ontario (2014). Letter to CNO: Recommendation to rescind requirement to perform psychotherapy, 4.

⁸ College of Nurses of Ontario (2017). Comment on new psychotherapy document. *The Standard*. Toronto: Author. January 2017. <http://www.cno.org/en/learn-about-standards-guidelines/magazines-newsletters/the-standard/january-2017/comment-psych/>

⁹ College of Registered Psychotherapists of Ontario (2017). Grandparenting application information. Toronto: Author. <http://www.crpo.ca/home/info-for-applicants/grandparentinginfo/>