



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

Angela Verrier  
President  
Council of the College of Nurses of Ontario

Anne Coghlan  
Executive Director and Chief Executive Officer  
College of Nurses of Ontario  
101 Davenport Rd.  
Toronto, ON M5R 3P1

April 13, 2015

Dear Angela and Anne:

Re: Initiation of RN Psychotherapy

As you are aware, the Registered Nurses' Association of Ontario (RNAO) has had lengthy correspondence with the College of Nurses of Ontario (CNO) regarding its Council's decision to require registered nurses (RNs) to obtain an order to initiate psychotherapy services once proclaimed as a controlled act. The process for arriving at the decision and the concerning impacts that it will have on access to mental health services are both problematic.

CNO initiated a call with us on March 20<sup>th</sup> led by Janet Anderson, Director of the Professional Practice Department, and a number of CNO staff. While we appreciated the time of your team, we left this meeting frustrated that CNO felt RNAO required "education" on the regulation of psychotherapy, rather than discussing a resolution to the concerns we have raised. RNAO is very familiar with the practice of psychotherapy and has conducted an extensive analysis of CNO's position on the initiation of psychotherapy. We have been transparent in our analysis and have communicated this within our correspondence with CNO.

We also take issue with CNO's assertion at the aforementioned meeting that the *Nursing Act* represents the barrier to RN's being unable to initiate psychotherapy without an order. As you know, the Act grants the Lieutenant Governor in Council authority to prescribe the procedures for governing the performance of controlled acts. Part Three of the *General* regulation of the Act specifies the conditions under which an RN can initiate a controlled act. CNO council could have pursued an initiation regulation, however, they decided against doing so.

Moving forward, we formally request a meeting before CNO Council to discuss the alarming effects that CNO's decision regarding the initiation of psychotherapy will have on the public. The aim of this dialogue will be a resolution that acknowledges the significant expertise of highly educated RNs who perform psychotherapy and the significant need to access mental health and addictions services in Ontario. Please respond with a date and time that is convenient for CNO council to dialogue with us.

With warm regards,



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

cc. Hon. Dr. Eric Hoskins, Minister of Health and Long-Term Care  
John Fraser, Parliamentary Assistant  
Dr. Bob Bell, Deputy Minister  
Denise Cole, Assistant Deputy Minister  
Allison Henry, A/Director, Nursing Policy and Innovation  
Kamini Kalia, Chair, Mental Health Nursing Interest Group