



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

Parliamentary Assistant John Fraser  
11th Floor, Hepburn Block  
80 Grosvenor Street  
Toronto, ON M7A 2C4

November 11, 2016

Dear John,

Thank you for meeting with representatives of the Registered Nurses' Association of Ontario (RNAO) on October 27, 2016. We appreciated your receptivity as we discussed our concerns with the College of Nurses of Ontario's requirement for registered nurses (RN) to obtain an order to initiate psychotherapy once it is proclaimed a controlled act.

Requiring an RN to obtain an order to initiate psychotherapy will only create another barrier to accessing to mental health services and hinder interprofessional collaboration due to blurred accountabilities. RNAO firmly believes if an RN has the competencies, knowledge and skills, to perform psychotherapy as part of his or her practice, that same RN is competent to initiate psychotherapy or refer the individual for more appropriate treatment and/or to another health provider.

John, RNs have many decades of experience initiating and conducting psychotherapy, with some providing this service as a cornerstone of their career. According to 2015 data from the College of Nurses of Ontario (CNO), 6,879 RNs report an employment responsibility of "mental health/psychiatric/addiction."<sup>1</sup> Representatives of RNAO's Mental Health Nurses Interest Group who were present at the meeting, Stacey Roles and Aaron Clark, provided you with compelling accounts of how expert RNs provide psychotherapy in practice, educate/supervise other health professionals, and increase access to care.

When the Health Professions Regulatory Advisory Council (HPRAC) reviewed the practice of psychotherapy, they identified it as a shared controlled act between professions and recommended that regulatory Colleges develop qualifications and standards for psychotherapy for their respective colleges.<sup>2</sup> Other Colleges have these standards<sup>3</sup> but the CNO created the requirement for nurses to obtain an order prior to initiating psychotherapy. For years RNAO has been in dialogue with the College of Nurses of Ontario regarding this matter, but we have been unable to come to a satisfactory arrangement.<sup>4,5,6</sup>

Ontario continues to struggle to provide adequate mental health and addiction care. The Deputy Minister has identified the significant role that RNs can play to treat mood disorders. However, this cannot happen unless they are able to autonomously initiate psychotherapy. Moreover, it is puzzling why other regulated professions such as occupational therapists,

social workers, psychotherapists, psychologists, nurse practitioners and physicians, can initiate psychotherapy while RNs are being limited in their scope of practice.<sup>6</sup>

John, we met with you and members of your staff (Allison and Alex) on March 24, 2015 to discuss key health care issues, including psychotherapy. Your team agreed to complete a constitutional law analysis and send a formal letter stating that RNs can initiate psychotherapy. RNAO has not received this follow-up.

We urgently need your intervention to remove this unnecessary barrier to care.

Warm regards,



Doris Grinspun, RN, MSN, PhD, LLD(hon), O.O.N.T.  
Chief Executive Officer  
Registered Nurses' Association of Ontario

Copy: Hon. Dr. Eric Hoskins, Minister of Health and Long-Term Care  
Dr Bob Bell, Deputy Minister of Health and Long-Term Care

## References

- <sup>1</sup> College of Nurses of Ontario (CNO). (2016). Data Query Tool Options. Retrieved from: <http://www.cno.org/en/what-is-cno/nursing-demographics/data-query-tool/query-options-page/>
- <sup>2</sup> Health Professions Regulatory Advisory Council [HPRAC]. (2008). An Interim Report to the Minister of Health and Long-Term Care on Mechanisms to Facilitate and Support Interprofessional Collaboration among Health Colleges and Regulated Health Professionals. Retrieved from: <http://www.hprac.org/en/reports/resources/HPRAC-EnglishInterprofessionalCollaborationInterimReportMarch08.pdf>
- <sup>3</sup> College of Occupational Therapists of Ontario. (2010). Standards for Psychotherapy. Retrieved from: [https://www.coto.org/docs/default-source/standards/coto\\_standards\\_psychotherapy.pdf?sfvrsn=2](https://www.coto.org/docs/default-source/standards/coto_standards_psychotherapy.pdf?sfvrsn=2)
- <sup>4</sup> Registered Nurses' Association of Ontario. (2015). Letter to CNO: Initiation of RN Psychotherapy. Retrieved from: <http://rnao.ca/policy/submissions/letter-cno-initiation-rn-psychotherapy>
- <sup>5</sup> Registered Nurses' Association of Ontario. (2014). Letter to CNO re: Requiring an Order to Perform Psychotherapy. Retrieved from: <http://rnao.ca/policy/submissions/letter-cno-re-requiring-order-perform-psychotherapy>
- <sup>6</sup> Registered Nurses' Association of Ontario. (2014). Letter to CNO: RNAO Recommendation to Rescind Requirement for Order to perform Psychotherapy. Retrieved from: <http://rnao.ca/policy/submissions/letter-cno-rnao-recommendation-rescind-requirement-order-perform-psychotherapy>