



**RNAO Submission regarding
modernization of the *Healing
Arts Radiation Protection Act***

Submitted to Health Quality Ontario's Expert
Panel to Enhance the Safety and Quality of
Energy-Appling Medical Devices in Ontario

October 11, 2015



RNAO recommendations to Health Quality Ontario (HQO) regarding the modernization of the *Healing Arts Radiation Protection Act (HARP Act)*

The Registered Nurses' Association of Ontario (RNAO) is the professional association representing registered nurses (RN), nurse practitioners (NP), and nursing students in Ontario. RNAO advocates for healthy public policy and to advance the role of nurses in enhancing the health of Ontarians. We welcome the opportunity to provide input to the Health Quality Ontario (HQO) expert panel regarding the modernization of the *Healing Arts Radiation Protection Act (HARP)*.

Nurse practitioners (NP) working to full scope of practice

RNAO is fully supportive of the government's goal, as expressed in the *Regulated Health Professions Statute Law Amendment Act, 2009* (often referred to as Bill 179¹), to increase timely access to quality care by expanding the scope of practice of health professionals within their education, knowledge and competencies. Despite Bill 179 being passed in 2009, amendments to the HARP Act that remove the limiting list of x-rays NPs can order, have yet to be proclaimed. Similarly, the regulatory amendments necessary to authorize NPs to order CT scans have not yet been enacted.² NPs are central to advancing timely access to quality care and their current inability to order all x-rays, CT scans, and MRIs presents an artificial barrier that limits their capacity to provide comprehensive care and health system effectiveness. Thus, RNAO urges in the strongest possible terms, that NPs be immediately authorized to order all x-rays and Computed Tomography (CT) scans. Furthermore, while outside the scope of this HARP Act review, RNAO urges to also proceed with authorizing NPs to order MRIs as part of their provision of comprehensive care for Ontarians.

These proposed changes are consistent with RNAO's evidence-based advocacy for full utilization of NPs.^{3,4} Eliminating barriers for NPs to order diagnostic imaging will enhance access to care for Ontarians in institutional and community settings, and advance health system effectiveness. This will also help meet the goals outlined in the *Excellent Care for All* strategy and the Minister's current *Action Plan for Health Care*⁵, which aims to promote access to high-quality care by qualified health professionals and the best use of resources.⁶ These changes will also reduce the cost of the health system as a whole by eliminating the need for orders from physicians and medical directives, which are expensive and time consuming.⁷ Moreover, these scope enhancements are consistent with other areas where the NP scope has expanded, including the ability to openly prescribe most medications⁸ and admit, treat, transfer and discharge hospital in-patients.⁹

Expanded scope of practice for Registered Nurses (RN)

RNAO also recommends that the authorization to order x-rays be extended to RNs with the appropriate education and knowledge.¹⁰ Health system effectiveness hinges on utilizing all health-care professionals, including RNs, to their full competencies, knowledge and skills. In 2012, RNAO led an expert provincial task force which identified the opportunity to expand the role of RNs to include the prescribing medication, ordering diagnostic testing and communicating a diagnosis.¹¹ These recommendations were based upon a wealth of evidence demonstrating the success of an expanded RN role in the United Kingdom.¹² RNs working to an expanded scope of practice will improve health system access, alleviate wait times, and drive cost-effectiveness. In many instances, RNs are already initiating these tests through delegation and medical directives. However, these processes contribute to unnecessary delays accessing care and treatment.

In 2012, Premier Wynne first committed to working with nurses to identify opportunities to expand their scope of practice.¹³ This was followed by a formal platform commitment to authorize RNs to prescribe medications¹⁴ and an announcement by Minister Hoskins at RNAO's 2015 Queens Park Day where RNAO was identified as the sponsor who would work with government to advance RN prescribing.¹⁵ Consultations toward this end are underway. This commitment is in line with key MOHLTC priorities, such as improving access to primary care providers and putting patients first.¹⁶

RNAO recommends that in addition to RN prescribing, RNs with appropriate education, knowledge and competencies be given the authorization to order x-rays. Moreover, RNs with appropriate expertise should also be authorized to order diagnostic ultrasound. RNAO is calling for the development of continuing education courses by 2016 to support current RNs who wish to practice to an expanded scope and embedding the expanded scope into the RN curriculum by 2020.

Conclusion

RNAO is pleased to provide input to HQO's expert panel regarding necessary updates to the HARP Act. We believe the practical and achievable measures described above will help us move toward our shared vision of timely access to quality, competent and cost-effective health-care for Ontarians. Thank you for giving us this opportunity to present our perspective. We look forward to ongoing collaboration on this important issue.

Summary of Recommendations:

1. Proclaim s. 6(1)(g) of the *Healing Arts Radiation Protection Act* to remove the list of x-rays from which NPs can prescribe.
2. Amend regulations under the *Healing Arts Regulation Protection Act* to permit NPs to order CT scans.
3. Amend relevant legislation and regulation to authorize NPs to order MRIs.
4. Amend relevant legislation and regulation to authorize RNs with the appropriate education and knowledge to order x-rays and diagnostic ultrasounds.

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