



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

September 3, 2014

RE: Requiring an Order to Perform Psychotherapy

Dear Angela:

The Registered Nurses' Association of Ontario is concerned with the approach taken by the Council of the College of Nurses of Ontario (CNO) in a decision regarding psychotherapy on March 6, 2014. The minutes from this meeting indicate that Council "... supports that Registered Nurses (RNs) and Registered Practical Nurses (RPNs) require an order to perform the controlled act of psychotherapy." While we respect the Council's mandate to protect the public interest, we do not feel that requiring an order to initiate psychotherapy is within the public interest.

In 2006, the Health Professions Regulatory Advisory Council (HPRAC) recommended that the Minister of Health and Long-Term Care make psychotherapy a controlled act.¹ Furthermore, HPRAC recommended that the controlled act of psychotherapy be shared among a number of regulated health professions, including nursing. In 2009, the *Regulated Health Professions Statute Law Amendment Act* amended the *Regulated Health Professions Act* to create the legislative framework to enable these changes. However, these amendments have yet to be proclaimed. RNAO has received concern from members who have practised psychotherapy for many years and are highly proficient in this area. They are concerned that their practice will be limited by CNO's decision to require an order to initiate psychotherapy and that clients will suffer given the significant barriers that already exist for accessing mental health care.

Moreover, the minutes from the March 6th CNO Council meeting provide vague rationale for the decision indicating that: "the theoretical and clinical components required to safely perform the controlled act of psychotherapy are not included in basic nursing programs at this time"; the perceived vague definition of psychotherapy in legislation and the assertion that psychotherapy is a "high risk activity". It is not clear how CNO Council arrived at these conclusions. Nor was RNAO consulted. RNAO feels that RNs understand the responsibility of their practice and are accountable to the public. If an RN does not feel that (s)he possesses the competencies, knowledge and/or skills to effectively and safely practice psychotherapy, then (s)he would not initiate or perform the controlled act. In its review of psychotherapy, HPRAC did not make any recommendation that nurses should require an order to initiate psychotherapy. Instead, they indicated: "HPRAC recommends that the Colleges of regulated professionals who practice psychotherapy (the Colleges of Psychologists, Social Workers and Social Service Workers, Nurses, and Physicians and Surgeons) develop, implement and enforce their own minimum qualifications and standards of practice specific to psychotherapy." Therefore, RNAO urges the CNO to focus its attention towards the development of standards of practice that relate to

¹ See HPRAC's *New Directions* (2006) report: <http://www.hprac.org/en/reports/resources/HPRAC-EnglishInterprofessionalCollaborationInterimReportMarch08.pdf>

psychotherapy, including recognition of the significant educational preparation and expertise that many nurse psychotherapists hold.

RNAO was pleased to see that Council considered establishing an initiation regulation for nurses who have pursued specialty education in psychotherapy. RNAO supports this approach. RNAO urges CNO to establish an initiation regulation for RNs who are appropriately educated in psychotherapy and to ensure that prior learning is recognized. It does not make sense to limit the public's access to vital mental health services when nurses already have countless years of experience practising psychotherapy and have often done so without an order.

While it was unfortunate that CNO Council did not engage RNAO in this decision making process, we trust that you will consider our feedback at this time and we encourage CNO Council to adopt our recommendation.

Warm regards,

A handwritten signature in black ink, appearing to read "Doris Grinspun".

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

c. Anne Coghlan, Executive Director and CEO, College of Nurses of Ontario
CNO Council