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

March 31, 2014

Honourable Deb Matthews
Minister of Health and Long-Term Care
10th Floor, Hepburn Block
80 Grosvenor St.
Toronto, ON M7A 2C4

Dear Deb,

Re: Removal of legislative/regulatory barrier to allow Nurse Practitioners to prescribe testosterone

In October 2013, the Federal government brought into effect, the New Classes of Practitioners Regulations under the Controlled Drugs and Substances Act. This change authorizes nurse practitioners to prescribe, administer and provide certain controlled substances in accordance with the Benzodiazepines and other Targeted Substances Regulations, Part G of the Food and Drug Regulations and the Narcotic Control Regulations. Some provinces are working to amend their laws to permit NPs to prescribe controlled substances under these federal regulations and it is in this context that I am writing to you.

Across Ontario, access to health care services for transgender (trans) people is very limited as shown in the recent Trans PULSE project (Bauer et al., 2012) – often as a result of the unwillingness of many physicians to provide care or as a result of their lack of knowledge and clinical training to appropriately do so. Nurses and nurse practitioners (NPs) have stepped in to provide key points of health care access to trans people. RNs and NPs are actively involved in the care of transmasculine and transfeminine clients with their involvement in hormone readiness assessments, pre and post surgical care, focussed counselling, health monitoring and health teaching.

While NPs can prescribe estrogen and progesterone for trans female clients, NPs who are doing testosterone readiness assessments for transmasculine clients, cannot prescribe testosterone because it is a controlled drug. If NPs were able to prescribe testosterone following hormone readiness assessment, it would reduce wait times for medically prescribed hormone treatment for transmasculine clients and thus increase their access to primary health care.

Minister, trans people are often among the most vulnerable in our society. For those in the process of transitioning, timely access to hormones, clinical care and emotional support, are critical components of high quality health care. RNAO fully supports nurses and NPs enhancing access to care for trans women and trans men. Allowing NPs to prescribe testosterone for readiness assessments for trans men, would be a long way to enhancing quality primary health care for trans men.

I urge you to make the necessary legislative/regulatory changes in Ontario to permit NPs to prescribe controlled substances under the new federal regulations, and do so, as soon as possible.

Warm regards,

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

Judith MacDonnell, RN, PhD
Associate Professor, School of Nursing,
Faculty of Health, York University
Policy & Political Action ENO,
RNAO Rainbow Nursing Interest Group (RNIG)



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Cc Leanne Powell and Jean Clipsham, Co-Chairs, RNIG
Cc Jill Burkholder, President, and Theresa Agnew, Executive Director, NPAO
Cc Debra Bournes, Provincial Chief Nursing Officer, Nursing Policy and Innovation Branch, MOHLTC

Reference:

Greta Bauer, Anjali K, Jake Pyne, Nik Redman, Kyle Scanlon, Robb Travers, (March 22, 2012). [Improving the Health of Trans Communities: Findings from the Trans PULSE Project.](http://transpulseproject.ca/wp-content/uploads/2012/04/Trans-PULSE.-Rainbow-Health-Ontario-Conference.-Plenary-2012-vFINAL.pdf) Rainbow Health Ontario Conference Plenary. Ottawa, Ont. <http://transpulseproject.ca/wp-content/uploads/2012/04/Trans-PULSE.-Rainbow-Health-Ontario-Conference.-Plenary-2012-vFINAL.pdf>