



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

Anne Coghlan, RN, MScN
Executive Director and CEO
College of Nurses of Ontario
101 Davenport Road
Toronto, ON M5R 3P1

February 11, 2019

Re: RNAO support of independent initiation of the controlled act of psychotherapy

Dear Anne,

The Registered Nurses' Association of Ontario (RNAO) appreciates the Council's decision at their December 2018 meeting to circulate for feedback a draft regulation that would, if approved by government, enable the independent initiation of the controlled act of psychotherapy. RNAO strongly supports the proposed amendments to Part III (Psychotherapy) of Ontario Regulation 275/94 (General) under the *Nursing Act*, 1991.

As you know from our meetings and correspondence over the years,^{1 2 3 4} RNAO has grave concerns about RNs requiring an order from a physician or NP as detrimental to access to mental health services, disruptive to the continuity of care, and cost ineffective with its duplicative of scarce health human resources. Like other disciplines that already have the authority to perform the controlled act of psychotherapy, qualified registered nurses are best situated to assess their own knowledge, skill and judgment, a particular client's condition, appropriateness of intervention, and accept sole accountability for initiation. That is why then-Minister of Health and Long-Term Care, Dr. Eric Hoskins, asked the Council to revisit this requirement as he had "full confidence in a RNs' ability to make an appropriate assessment to initiate the act."⁵

RNAO is proud of our members that have provided expert, safe, and compassionate psychotherapy services over the years and even decades. They have sought out and completed evidence-based training in psychotherapy that includes theory, practicum, and supervision in order to be competent as they entered practice and as part of ongoing professional development.

In keeping with the guidance received from these members and RNAO's Mental Health Nursing Interest Group (MHNIG), we urge the College to provide practice standards, guidelines, and tools equivalent to the other regulatory colleges whose members practise psychotherapy. As an example, the College of Occupational Therapists of Ontario has updated standards for psychotherapy⁶ and a decision tree⁷ to help their members determine when the standards for psychotherapy apply. This would provide clarity to novice nurses who are seeking direction in pathways to provide psychotherapy services, enhance public safety, and provide a common, congruent approach to this vital service.

Increasing access to nurses who are qualified to practice the controlled act of psychotherapy has the potential to help in the recovery of many individuals, families, and communities that are

currently in distress. RNAO and MHNIG members who are experienced in the practise of psychotherapy reiterate a strong desire and willingness to work with CNO on this file.

Thank you again for the opportunity to provide feedback.

Warm regards,



Doris Grinspun, RN, MSN, PhD, LLD(hon), Dr(hc), FAAN, O.ONT
Chief Executive Officer, RNAO

CC: Hon. Christine Elliott, Minister of Health and Long-Term Care
Helen Angus, Deputy Minister of Health and Long-Term Care

¹ Registered Nurses' Association of Ontario (2014, September 3). Letter to CNO: Requiring an order to perform psychotherapy. https://mao.ca/sites/mao-ca/files/RNAO_Letter_to_CNO_-_re_Requiring_an_order_to_perform_psychotherapy_-_Se_.pdf

² Registered Nurses' Association of Ontario (2014, November 19). Letter to CNO:RNAO recommendation to rescind requirement for order to perform psychotherapy. https://mao.ca/sites/mao-ca/files/RNAO_to_CNO_psychotherapy_FINAL_nov_19_2014_1.pdf

³ Registered Nurses' Association of Ontario (2015, April 13). Letter to CNO: Initiation of RN psychotherapy. https://mao.ca/sites/mao-ca/files/RNAO_-_Letter_to_CNO_re_Initiation_of_RN_Psychotherapy.pdf

⁴ Registered Nurses' Association of Ontario (2017, January 30). Letter to CNO: Request that CNO pursue a regulation to enable RN initiation of psychotherapy. https://mao.ca/sites/mao-ca/files/RNAO_-_Letter_to_CNO_-_re_RN_Psychotherapy_-_Jan_30_2017_0.pdf

⁵ Hoskins, E. (2017, December 21). Letter to CNO: College's position on registered nurses initiating the controlled act of psychotherapy. Toronto: Ministry of Health and Long-Term Care. Retrieved from CNO' Council briefing package for meeting held from September 12-12, 2018, p. 97-98. <http://www.cno.org/globalassets/1-whatiscno/council/meetings/2018/council-sept2018-observerversion.pdf>

⁶ College of Occupational Therapists of Ontario (2018, August). *Standards for Psychotherapy*. Toronto: Author. https://www.coto.org/docs/default-source/default-document-library/standards-for-psychotherapy-2018.pdf?sfvrsn=f713ae81_0

⁷ College of Occupational Therapists of Ontario (2018, June). Determining when the standards for psychotherapy apply. Toronto: Author. https://www.coto.org/docs/default-source/default-document-library/determining-when-the-standards-for-psychotherapy-apply-2018.pdf?sfvrsn=8b1634a8_0