



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

**Hon. David Caplan**  
**HPRAC Consultations**  
Ministry of Health and Long-Term Care  
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January 29, 2009

Dear Mr. Caplan,

Thank you for the opportunity to respond to the March 2008 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<sup>1</sup> specifically related to Traditional Chinese Medicine Practitioners and Acupuncturists, Psychotherapists and Eye care Specialists in Ontario.

RNAO strongly endorses regulatory and legislative changes that will facilitate implementation of the recommendations in this report which urges the collaboration of all health professionals to increase access to health services and share controlled acts. The proposed changes will allow the various members of the interprofessional team to use their knowledge, skills, and experience to their maximum extent, allowing them to practice to their full scope, and to collaborate to improve the health and better serve the needs of Ontarians.

As the professional organization for registered nurses in the province, we believe that these changes will serve the public by strengthening the safety and effectiveness of Ontario's health care system.

### **Specific Comments**

#### College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario

As an important step towards self-regulation, RNAO strongly supports the HPRAC recommendation of the inclusion of a total of three representatives selected from and recommended by the professional Colleges of Ontario to sit on the transitional Council of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario. Though RNAO feels strongly about the need and ability of professions to regulate themselves, during this critical time of transition and policy development, the guidance and advice provided by an Interprofessional transitional council would provide the College of TCM Practitioners and

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<sup>1</sup> Health Professions Regulatory Advisory Council. (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*. Toronto: HPRAC.

Acupuncturists a solid foundation with which they could build their regulatory body.

In addition, RNAO supports the HPRAC recommendation that the professional Colleges of Ontario establish a continuing Interprofessional Advisory committee on Acupuncture to provide advice and promote the development of high minimum qualifications, general standards of practice, quality assurance and continuing competence, educational qualifications and equivalency standards for members and any other matters relevant to the practice of acupuncture.

#### College of Psychotherapy.

As with the College of TCM Practitioners and Acupuncturists, RNAO supports the HPRAC recommendation of the inclusion of representatives selected from and recommended by the professional Colleges of Ontario to sit on the transitional council of the College of Psychotherapists and Registered Mental Health Therapists of Ontario.

Psychotherapy is a controlled act which is performed by several regulated professions in Ontario, including Registered Nurses, and though title restriction may be in the public interest, restricting this title from other trained, registered professionals who have the knowledge, skills and ability to perform this act within their scope of practice may ultimately lead to public confusion. Therefore, RNAO encourages HPRAC to expand title protection to include any nominated members of professions who share the scope of practice of psychotherapy, including Registered Nurses. In addition, RNAO feels those individuals who are practicing psychotherapy but are not registered professionals from the list of collaborating colleges should be disallowed from using this protected title.

#### Colleges of Eye Care Specialists

While HPRAC has not engaged in a formal consultative process on Eye Care specialists, RNAO would like to encourage the ongoing negotiation and collaboration, particularly between Optometrists and Opticians. The provision of high quality interprofessional care, where the public's interest is foremost, must be held out as an example of best practice.

The continued efforts on HPRAC's part, to enable broad and comprehensive consultation on the Scope of Practice for all Registered Health professions are commended. We are hopeful that the perspective we have provided is helpful to HPRAC's deliberations and we are confident that this important work will have a positive impact on patient care and advance the implementation and integration of interprofessional collaborative teams in a wide variety of disciplines throughout Ontario's health-care system.

Sincerely,



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