



August 11, 2017

Ms. Anne Coghlan  
Executive Director,  
College of Nurses of Ontario  
101 Davenport Road  
Toronto, ON, M5R 3P1

Dear Ms. Coghlan,

**Re: Proposed Changes to Third-Party Evaluation Fees by CNO**

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The Ontario Nurses' Association (ONA) is pleased to provide feedback on the proposed changes to College of Nurses of Ontario (CNO) by-laws Section 2.06 (i), (ii) and (iii). Specifically, CNO is proposing a \$500 fee for registered nurse (RN) applicants who need to be evaluated directly by the College when a third-party evaluation cannot meet certain language or accommodation needs. It is also proposing an increase in costs for evaluations for registered practical nurses (RPNs) and nurse practitioners (NPs) from \$200 to \$225 to account for both a new software program and inflation over the three years the by-law has been in place.

While ONA appreciates both inflation and software costs, the specific proposal related to a significant increase for a third-party evaluation for RNs only is cause for concern. To focus on RNs with language and/or accommodation issues is discriminatory and would also cause financial hardship for this group of nurses if they are not working. This should be an expense that could be absorbed by all applicants given that only three RNs have been subjected to this in the past four years.

We would caution the College that francophones, as well as other non-anglophone groups, could be at a social disadvantage and are often affected by other discrimination compounded by language issues. We believe organizations have a duty to ensure an environment free of any kind of actual or perceived discrimination, including when language may be a factor associated with grounds protected under the Ontario *Human Rights Code* or s. 86(1) of the *Regulated Health Professions Act*.

Thank you again for the opportunity to provide feedback.

Sincerely,

**ONTARIO NURSES' ASSOCIATION**

Linda Haslam-Stroud, RN  
President

C: Marie Kelly, Chief Executive Officer/Chief Administrative Officer, ONA  
Board of Directions, ONA  
Council Members, CNO  
Denise Cole, ADM, Health Workforce Planning and Regulatory Affairs Division