

**ONTARIO NURSES' ASSOCIATION**

**SUBMISSION**

**ON**

**Expanding the Scope of Practice for Nurse Practitioners and Pharmacists  
(Proposed Amendments to Regulations 682 and 683 made under the Laboratory and  
Specimen Collection Centre Licensing Act)**

**Health Workforce Regulatory Oversight Branch**

**July 23, 2020**



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The Ontario Nurses' Association (ONA) is the union representing 68,000 registered nurses, including nurse practitioners and health-care professionals, as well as 18,000 nursing student affiliates, providing care in hospitals, long-term care facilities, public health, the community, clinics and industry.

We welcome this opportunity to provide feedback on the proposed amendments to regulations 682 and 683 made under the Laboratory and Specimen Collection Centre Licensing Act to enable an expanded scope of practice for certain regulated health professionals, including Nurse Practitioners (NPs), and pharmacists.

1. ONA is supportive of the expansion and recognition of the NP scope of practice. We support the proposal to amend Regulation 682 (Laboratories) made under the Laboratory and Specimen Collection Centre Licensing Act (LSCCLA) to authorize NPs to independently perform a broad range of point-of-care tests to assist with diagnosis and the formulation of treatment plans for their patients. Specifically, the proposed amendment to Regulation 682 includes:
  - Exempting members of the College of Nurses of Ontario who are registered as Registered Nurses in the Extended Class from certain requirements of the LSCCLA (sections 5 to 16 of the Act) and from provisions of Regulation 682 (Laboratories) for the purposes of performing laboratory tests for the exclusive purpose of diagnosing or treating their patients.

Currently, there are barriers that prevent NPs and Registered Nurses in the Extended Class from practicing to their full scope. These barriers range from physician resistance to institutional and benefit administration policies that do not authorize compensation for testing if it is ordered by any discipline other than a physician.

The implementation of the proposed amendments to Regulation 682 will minimize delays and facilitate the delivery of timely care to patients by NPs and Registered Nurses in the Extended Class. These nurses have the skills, ability, competence and scope to authorize the necessary testing to assist them with diagnosing and formulizing treatment plans for their patients.

2. ONA has concerns regarding the proposed amendments to Regulation 682 (Laboratories) that would authorize members of the Ontario College of Pharmacists to perform certain point-of-care tests for medication management of certain chronic diseases. These include:
  - o Blood glucose
  - o Hemoglobin A1C
  - o Lipids
  - o Prothrombin time and International Normalized Ratio (INR).

Many pharmacists do not have a formal education that is grounded in disease management and assessment of patients with multiple co-morbidities such as those identified in the list above. Without the oversight of an NP or a physician, an improper evaluation and treatment

plan could inadvertently cause harm to patients. In the primary care setting, NPs provide a thorough assessment and could involve several areas of health teaching that may not be covered by the pharmacist care. Many patients may choose to be monitored by a pharmacist out of convenience rather than by an NP or a physician who manages and possesses the overall knowledge of their entire health history.

3. ONA supports the amendment to Regulation 683 (Specimen Collection Centres) made under the LSCCLA to exempt Registered Nurses in the Extended Class from certain requirements of the LSCCLA and the Regulation for the purposes of collecting specimens from their patient for the purposes of performing point-of-care tests.

Notably, the educational background of Registered Nurses in the Extended Class includes specimen collection, labelling and processing. In addition, Registered Nurses in the Extended Class are generally employed by a Family or Community Health Team or other institution wherein there is appropriate storage of such specimens and the risk of cross contamination is a non-issue.

ONA does not support the proposal for specimen collection to be conducted by pharmacists. The adequacy of facilities (pharmacies) for storage prior to transport to a laboratory is a concern. The educational background of pharmacists does not cover specimen collection, labelling and processing. Further, the risk of cross contamination from specimens to medications is great and outweighs the benefits of convenience.

In closing, we urge the government to give due consideration to our expressed concerns and recommendations. ONA is available to meet or schedule a conversation with you should further background or clarity be required.