



November 16, 2023

VIA EMAIL - ED@cnomail.org

Ms. Silvie Crawford, RN, BHScN, LLM – Health Law
Executive Director & CEO
College of Nurses of Ontario
101 Davenport Road
Toronto, ON M5R 3P1

Dear Ms. Crawford,

Re: ONA Submission: Proposed Regulation Changes to the Education Registration Requirements under the *Nursing Act, 1991*, Ontario Regulation 275/94.

The Ontario Nurses' Association (ONA) is the union representing 68,000 registered nurses (RNs) and health-care professionals, and more than 18,000 nursing student affiliates, who provide care in hospitals, long-term care facilities, public health units, community, industry and clinics.

Upon review of the Ministry of Health and College of Nurses of Ontario's (CNO) proposed changes to the education and registration requirements noted in the *Nursing Act, 1991*, Ontario Regulation 275/94, General for new nurses, Registered Nurses and Registered Practical Nurses, the ONA does not support the recommended changes for Part II Registration, General Certificates of Registration – Registered Nurse.

Specifically, Section 2. (1) 1. ii.; changing the requirements from possessing "a minimum of a baccalaureate degree in nursing evidencing the successful completion of a program" to "must have successfully completed a relevant program." The rationale for this proposed change was that "the largest barrier for internationally educated nurses (IENs) to register is the education equivalency requirement. Currently, for programs completed outside of Canada, education must be assessed for equivalency, which is an expensive and time-consuming process." Any Registered Nurse who wishes to practice in Canada must assess their education for Canadian equivalency, no matter how time-consuming or costly it may be. By identifying if their education meets the same standards that Canadian nurses are subjected to, the CNO will ensure the public's safety, which must always remain the priority.

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While certain nursing programs may be equivalent to Canadian programs, others may not, and this requires a specific review and evaluation of each individual nursing program in a non-discriminatory and equitable manner. ONA welcomes all nurses, including IENs, but feels strongly that all nurses must have the appropriate education and support to ensure long-term retention.

ONA appreciates that the purpose of the change is to ensure a timelier process to practice nursing and to increase the number of nurses practicing in Ontario. However, it must be done with the appropriate safeguards to ensure all nurses can successfully practice in a Canadian practice environment; otherwise, any laudable objectives will be thwarted.

Additionally, the proposed change puts Canadian-trained RNs at a disadvantage. All Canadian RNs have studied for at least two years in a diploma program or a four-year Bachelor of Science in Nursing (BScN) program, which is currently the minimum education requirement for entry to practice approved by the CNO or a body approved by the CNO. IENs may possess different knowledge, skills or judgments than Canadian-trained RNs.

All nurses wishing to practice in Ontario must be held to the same educational standards regardless. History has taught us valuable lessons – one of which is the importance of standardizing education and learning for nurses across Ontario. When discussions occurred to transfer patients or transfer staff to assist during the Severe Acute Respirator Syndrome (SARS) outbreak, it was identified that critical care nurses were not trained to the same knowledge or skill level across the province. Standardizing education and registration requirements for new nurses should be nothing less. A standardized, comparable education and registration process must be followed to ensure a fulsome understanding of the education and registration requirements, and to hold all nurses to the same standards across the province of Ontario. Only then can all nurses possess the same knowledge, skill and judgment that is expected of them to provide safe, quality, ethical patient care.

This proposed initiative emphasizes the overall quantity of nurses and the speed in which they can enter the workforce, rather than the quality of nursing care obtained through the current Ontario education requirements. With the expanding scope of practice and RN prescribing initiative, it is more important than ever that all nurses meet the primary education and registration requirements so that a fulsome understanding and knowledge base is equivalent amongst all nurses entering the field.

Additionally, ONA does not support removing the language under Part II Registration, General Certificates of Registration – Registered Nurse, 2. (1) 1. iii. All Registered Nurses wishing to practice in Ontario must have completed a program in nursing specifically designed to educate and train persons to be practicing Registered Nurses, and must have completed a program that, at the time the applicant commenced it, was approved by the CNO as one whose graduates possess knowledge, skill, and judgment at least equivalent to those of current graduates of a Canadian program.

In addition, all Registered Nurses wishing to practice in Ontario must have paid any fees required under the by-laws, undergone an evaluation approved by the CNO and satisfied the Executive Director or a panel of the Registration Committee that they have successfully completed further education or training or combination of education and training approved by the Registration Committee that was identified in the evaluation as being necessary to indicate that the applicant possesses knowledge, skill and judgment at least equivalent to those of current graduates of a program.

However, ONA is in support of the new language proposed for Part II Registration, General Certificates of Registration – Registered Nurse, 2. (1) 6. Specifically, as the five-year time frame aligns with the Jurisprudence Exam timing and that the regulation proposes applicants complete a program or course focusing on the health-care system in Canada. Possessing a solid knowledge base and understanding of the Canadian health-care system is imperative for any nurse practicing within it, as it directly impacts patient outcomes.

ONA would like to caution the CNO with moving forward with some of the proposed changes for the *Nursing Act, 1991*, Ontario Regulation 275/94, General for new nurses, RNs and registered practical nurses (RPNs). Working in Ontario as a nurse is a privilege, not a right. All nurses granted registration in Ontario must be held to the same standard of education irrespective of where they have trained. Adopting different registration standards is an ill-advised attempt to fix the nursing shortage in Ontario. This is especially true if new nurses are not equipped to practice and are then terminated or reported to the College, and could pose a grave risk to the public's safety and to all nurses currently registered and working in Ontario.

Sincerely,

ONTARIO NURSES' ASSOCIATION



Erin Ariss, RN
President

C: ONA CEO and Board of Directors