



Advant**Age**
Ontario

Advancing Senior Care

Response to Consultation on Potential Changes to Scopes of Practice for Nurse Practitioners and Registered Nurses

October 25, 2024

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Introduction

Nurses make invaluable contributions to our healthcare system and provide safe, effective, and person-centered care across the seniors' care continuum. As one of the largest seniors' care associations in the province, we appreciate this opportunity to share our feedback to the Ministry of Health's (the Ministry) consultation on the potential expansions to the scopes of practice of nurse practitioners (NPs) and registered nurses (RNs).

It is our understanding that, through this consultation, the Ministry is seeking to understand whether the proposed potential expansions to the scopes of practice of NPs and RNs would in fact support more timely delivery of care. We commend the Ministry for exploring ways to increase access to timely healthcare services and reduce barriers to care given the major health human resource shortages that the system is facing.

AdvantAge Ontario members are generally supportive of the potential scope of practice expansions for NPs and RNs. Throughout this submission we provide commentary relevant to the seniors' care sector, and more specifically to long-term care, for the Ministry's consideration should they move forward with specific legislative or regulatory amendments.

Commentary

1. Potential Changes to Scope of Practice for Nurse Practitioners

Ordering and Applying Electricity

AdvantAge Ontario members are supportive of this potential expansion of scope.

Where our members were wary of the potential expansion to NPs' scope of practice to authorize the ordering and applying of electricity was in respect to the corresponding need for training. It is critical that NPs have the skills, knowledge and judgement to perform these procedures safely and effectively. Here, there are considerations for the cost and time commitment of training, both in initial certification and continuing competence.

Our members indicated that this expansion of scope is less relevant in the long-term care sector specifically. This is both because of the acute nature of these interventions and because the necessary equipment is not as readily available in these settings.

Mandatory Blood Testing Forms and Certifying Death

We are supportive of these proposed expansions to NPs' scope of practice.

AdvantAge Ontario members do not foresee any risks or anticipated costs associated with expanding the scope of practice for NPs to complete and sign mandatory blood test forms and to certify death in all circumstances.

Regarding the completion of mandatory blood test forms, members also noted that this proposed expansion would speed up the application process for and support more timely access to services.

Optimizing Nurse Practitioners as Medical Directors in Long-Term Care

We recommend that NPs be permitted to act as Medical Directors, in addition to physicians, in the long-term care sector. Moreover, we recommend that the Ministry work in collaboration with other ministries to incentivize NPs working in the long-term care sector by providing fair and competitive salaries.

While we understand that this consultation is focused on scope of practice changes under the Ministry of Health's purview, we would encourage the ministries of Health and Long-Term Care to work together to expand this work to include amending the Fixing Long-Term Care Act, 2021, (FLTCA) to allow NPs to act as Medical Directors in long-term care, in addition to physicians.

As the province looks to expand the scope of NPs to promote better access to primary care, the optimization of NPs in long-term care settings cannot be overlooked. We need to consider how we can continue to leverage this role to not only enhance quality of care but also address the on-going health human resources challenges being felt in these care settings.

Regardless of the model that NPs work within, evidence demonstrates that employing NPs to provide primary and acute care in the long-term care setting comes with a myriad of benefits, such as improved resident outcomes, increased family satisfaction, and decreased unnecessary hospitalizations.

At present, Ontario has one of the lowest per capita levels of doctors in the country. In fact, over two million people living in Ontario do not have a family doctor, and thousands of physician positions are going unfilled. Long-term care homes across the province are also feeling these pressures as they're struggling to recruit and retain Medical Directors, which is a mandated position under the FLTCA. These struggles are particularly pronounced among our rural and northern homes. In contrast, 2023 data from the Canadian Institute for Health Information shows that the number of NPs employed in the sector has steadily increased over the last decade.

Here, AdvantAge Ontario member homes see an opportunity to both address their challenges in obtaining a Medical Director and continue to optimize NPs in their homes.

At present, the FLTCA stipulates that a Medical Director must be a physician. However, throughout the first wave of the pandemic, the Ontario government issued an emergency order permitting NPs to work as Medical Directors in long-term care and to act as the most responsible provider. This was well-received, and it worked effectively for those homes who needed to use that provision.

Currently, the compensation for NPs in the long-term care sector is lower than that of other healthcare settings, which greatly influences their willingness to work in this sector. Competitive

salaries and benefits for NPs in long-term care need to be comparable to those NPs in other care settings, such as acute care and outpatient care.

Therefore, beyond our recommendation to expand the FLTCA to include NPs to be able to act as Medical Directors, the current level of compensation for NPs in the sector would need to be considered by the Ministry in collaboration with other ministries. Importantly, NPs need to be fairly compensated above the current funded amount to support both the optimization of NPs in this sector in general as well as NPs acting as Medical Directors.

2. Potential Changes to Scope of Practice for Registered Nurses

Certifying Death

We are supportive of expanding the scope of RNs to permit completing and signing a Medical Certificate of Death, though, we do have several considerations for the Ministry in respect to this expansion of scope.

All RNs practicing in Ontario must have Professional Liability Protection (PLP) as mandated by the College of Nurses of Ontario. AdvantAge Ontario members raised that amending the General regulation under the *Vital Statistics Act, 1990*, to authorize RNs to complete and sign a Medical Certificate of Death may require additional PLP coverage. This coverage would be an added cost for nurses.

Moreover, our members raised that RNs in the long-term care sector will need support to feel comfortable with this expansion of their scope – not only in terms of liability, as noted above, but also in terms of capacity. Long-term care homes are increasingly caring for persons who are dying. In fact, the average length of stay until death for residents is becoming shorter, and most residents stay in long-term care until their end of life. Thus, this potential expansion of scope is highly relevant to RNs in the long-term care sector.

For this reason, it is critical that if the registered nursing scope is expanded to authorize the completing and signing of a Medical Certificate of Death, that all RNs practicing in long-term care settings be provided with accessible and appropriate education to ensure they have the necessary knowledge and skills to perform this practice.

Significantly, our membership also highlighted that this expansion of scope would be particularly beneficial in rural and remote communities.

Conclusion

The Association appreciates the opportunity to be consulted on the potential expansions to the scope of nursing practice, given that our membership employs a large number of NPs and RNs across the seniors' care sector.

Our membership is generally supportive of the potential expansions of scope being proposed, and throughout this submission, we have provided commentary and considerations for the Ministry as the potential expansions relate to the long-term care sector.

Through this submission, we further advance that, at present, NPs are not being used to their full scope in the long-term care sector -- most significantly being their current inability to act as Medical Directors, in addition to physicians.

About Us

For more than 100 years, AdvantAge Ontario has been the voice of not-for-profit seniors' care in Ontario. We represent more than 500 providers of long-term care, seniors' housing, supportive housing and community service agencies, including 98 per cent of all municipal long-term care homes and 86 per cent of all not-for-profit long-term care homes. We are the only association representing the full continuum of seniors' care in the province.

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