

April 6, 2022

By-Email

Standing Committee on Finance and Economic Affairs
Legislative Assembly of Ontario
111 Wellesley St. W
Toronto, ON M7A 1A2

To Whom it May Concern:

Re: Bill 106, Pandemic and Emergency Preparedness Act, 2022

The College of Nurses of Ontario (CNO) is pleased to comment on Bill 106, *the Pandemic and Emergency Preparedness Act, 2022*. Specifically, we would like to respond to the proposed changes outlined in Schedule 6 and amendments to the *Regulated Health Professions Act, 1991* to add new requirements to the Health Professions Procedural Code and to add related regulation-making powers.

CNO is supportive of proposed amendments that further the goal of increasing health human resources capacity in Ontario. While there are not details about proposed changes since these would be in regulation in the future, please find our comments on the amendments in schedule 6 below.

Canadian experience

CNO is supportive of the proposed change. It is not a requirement for registration as a nurse in Ontario for internationally trained nurses to have Canadian experience.

Language proficiency

At this time, it is not clear what is being proposed for future regulations (e.g., a standardized test for all). Standardizing requirements across colleges may have unintended consequences. For example, this could undermine work that colleges have underway to find right-touch approaches for applicants to meet a language proficiency requirement. For example, CNO has a new language proficiency policy that gives applicants flexibility in terms of demonstrating how they meet fluency through healthcare experience, healthcare education or by achieving a minimum score on an approved proficiency test.

Depending on what is being proposed, this may result in additional costs for internationally educated nurses (e.g., if their only option is to successfully pass an exam as opposed to demonstrating fluency through their healthcare education or experience in English or French).

Time limits for registration decisions

We support time limits only for aspects that are in CNO's control. Any time limit should begin after the applicant has provided all required information (e.g., some applicants are delayed in getting documents to CNO) and completed all requirements (e.g., registration examination). The speed to expedite registration needs to be balanced with an assessment of the applicant such that public safety remains at the forefront.

Emergency class of certificates of registration

During the pandemic, CNO registered nurses through the Emergency Assignment Class (EAC) as per existing regulations under the *Nursing Act, 1991*. CNO is supportive of mechanisms that support other health professionals being registered to support the healthcare system in an emergency.

We look forward to working with the Ministry of Health and other regulators to implement reforms that will strengthen health professional regulation in Ontario. Please feel free to contact Kevin McCarthy, Director Strategy (kmccarthy@cnomail.org) if you have questions about our submission.

Sincerely,



Carol Timmings, RN, BNSc, MEd
Acting Executive Director and CEO