

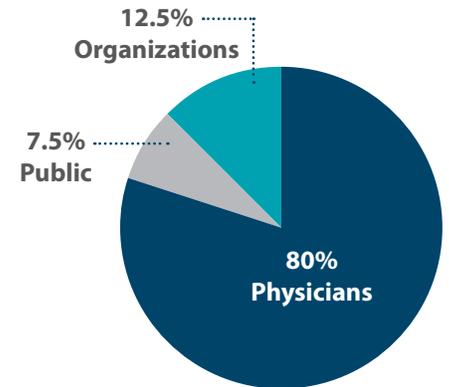
# Ensuring Competence: Changing Scope of Practice and/or Re-entering Practice

**Update: *New Policy Approved***



## WHO WE HEARD FROM

- ▶ 40 submissions were received in response to this consultation.
- ▶ Feedback was primarily submitted by physicians, but we also heard from members of the public, and a few organizations including the Ontario Medical Association, the Professional Association of Residents of Ontario, the Medical Psychotherapy Association of Canada, the OMA Section on Chronic Pain, and the Information and Privacy Commissioner of Ontario.



VIEW THE FEEDBACK: [SURVEY REPORT](#) AND [WRITTEN COMMENTS](#)



## WHAT WE HEARD

- ▶ Broadly speaking, the majority of online survey respondents supported the draft policy expectations. They agreed that the following expectations were important:
  - o that physicians wishing to change their scope of practice and re-enter practice report this intention to the College;
  - o that physicians undergo the College process for ensuring competence before changing scope of practice and re-entering practice; and,
  - o that the College approves requests before physicians change their scope of practice or re-enter practice.
- ▶ Respondents, including both physicians and organizations, generally felt the draft policy and appendices were clear and comprehensive.
- ▶ With respect to the two substantive changes made in the draft policy:
  - o Respondents were generally divided about whether reporting a return to practice or a return to a previous scope of practice after an absence of two years instead of three years was reasonable.
  - o Respondents were also generally divided about no longer including part-time physicians (those practising less than six months in the preceding five-year period) in the policy.
- ▶ The following represent other key feedback received during the consultation:
  - o The CPSO's changing scope of practice process undermines the Royal College of Physicians and Surgeons of Canada's (RCPSC) and the College of Family Physicians of Canada's (CFPC) certification processes and allows physicians to practice without meeting their requirements.
  - o The policy should not allow physicians who are not certified by the RCPSC to practise in fertility medicine.
  - o Requiring reporting of significant changes in practice environment will hinder the ability to attract physicians to rural areas and thus a change in practice environment should not be considered a significant change in scope of practice.
  - o The policy should include more examples of significant changes in scope of practice.



## OTHER IMPORTANT CONSIDERATIONS

- ▶ In addition to the feedback, we considered a wide range of other information while developing the final policy. This included:
  - o Policies and guidelines of other organizations, including other Canadian medical regulators.
  - o A review of relevant legislation.



## HOW WE RESPONDED TO YOUR FEEDBACK

- ▶ Revisions were made to the policy and appendices to enhance both clarity and comprehensiveness.
- ▶ The revised policy retains the central positions and key principles of the draft policy.
- ▶ Some specific examples of revisions undertaken are set out below, along with instances where revisions were not made.

POLICY DECISION	RATIONALE
<ul style="list-style-type: none"> <li>▶ <i>The policy appendix now emphasizes that physicians who have undergone the Changing Scope of Practice process do not practise in the same capacity as specialists and that changes in scope of practice are only permitted once the physician has demonstrated their competence regarding the specific changes intended to be incorporated.</i></li> </ul>	<ul style="list-style-type: none"> <li>▶ <i>This content was added in response to concerns that the CPSO change in scope of practice process undermines the RCPSC and CFPC certification process.</i></li> </ul>
<ul style="list-style-type: none"> <li>▶ <i>The policy has been updated to remind physicians who change their scope of practice that they must continue to comply with the Use of Specialist Title regulation and describe their practice using the appropriate framework set out in the regulation.</i></li> </ul>	<ul style="list-style-type: none"> <li>▶ <i>This content was also added in response to concerns that the CPSO change in scope of practice process undermines the RCPSC and CFPC certification process.</i></li> </ul>
<ul style="list-style-type: none"> <li>▶ <i>Appendix 1 to the revised draft policy has been updated to include more examples of significant changes in scope of practice and clarification that the changing scope of practice process permits physicians to change their scope to include components of fertility medicine.</i></li> </ul>	<ul style="list-style-type: none"> <li>▶ <i>These examples were added in response to consultation feedback requesting additional examples and feedback expressing concern about physicians without RCPSC certification being permitted to practise fertility medicine.</i></li> </ul>
<ul style="list-style-type: none"> <li>▶ <i>The policy has maintained practice environment as a factor in determining scope of practice and as such those wishing to significantly change their practice environment will continue to be captured by the policy.</i></li> <li>▶ <i>A Frequently Asked Questions document has been developed to address the fact that not every change in practice environment is considered a change in scope of practice.</i></li> </ul>	<ul style="list-style-type: none"> <li>▶ <i>Practising in different practice environments may require the use of different skills and knowledge.</i></li> <li>▶ <i>Maintaining the requirement to report significant changes in practice environment helps to ensure that physicians have the competence required to practise in all settings.</i></li> </ul>
<ul style="list-style-type: none"> <li>▶ <i>The revised draft policy has not been amended to capture part-time physicians or to set a minimum threshold for practice.</i></li> </ul>	<ul style="list-style-type: none"> <li>▶ <i>There are low numbers of physicians who report practising part-time (less than six months in the preceding five-year period) and there are other systems in place that help to ensure that part-time physicians maintain competence.</i></li> <li>▶ <i>For example all physicians are required to comply with the College's Continuing Professional Development requirements.</i></li> </ul>

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► *The policy has maintained the two year reporting threshold.*

► *The requirement to report and demonstrate competence after an absence of two years instead of three better protects the public and reflects research that skills have been shown to decline for absences shorter than three years.*

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## THE FINAL POLICY

► The final **Ensuring Competence: Changing Scope of Practice and/or Re-entering Practice** policy received final approval from Council on February 23, 2018. It is now a formal policy of the College of Physicians and Surgeons of Ontario.

► A Frequently Asked Questions document has been developed to elaborate on key issues and to provide clarity about the Changing Scope of Practice and Re-entering Practice process.

READ THE [FINAL POLICY](#)

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## KEY MESSAGES OF THE FINAL POLICY

- 1) Scope of practice is a term that describes a physician's practice at a particular point in time and is determined by a number of factors including: education, training, and certification; the patients the physician cares for; the procedures performed; the treatments provided; and the practice environment.
  - 2) Physicians must report an intention to change their scope of practice, which includes making a significant change to one of the factors of scope of practice or returning to a scope of practice in which they have not practised for two consecutive years or more.
  - 3) Physicians must report an intention to re-enter practice after an absence of two years or more.
  - 4) Physicians must indicate in the Annual Renewal Survey that they have reported an intention to change their scope of practice and/or an intention to re-enter practice.
  - 5) All physicians who wish to change their scope of practice and/or re-enter practice must participate in a College review process to demonstrate their competence in the area in which they intend to practise. This process is individualized for each physician but generally includes a needs assessment, training, supervision and a final assessment.
  - 6) Physicians must not practise in a new scope of practice or re-enter practice unless the College has approved their request.
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