



## THE COLLEGE OF PHYSICIANS AND SURGEONS OF ONTARIO

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### ***Delegation of Controlled Acts: Draft Policy and Advice to the Profession***

CPSO's [Delegation of Controlled Acts](#) policy is currently being reviewed. A new draft policy and companion *Advice to the Profession* document have been developed. These drafts are now being circulated for feedback.

The following survey asks you a few questions about the draft policy and companion [Advice to the Profession](#) document. It will take approximately **15 minutes** to complete. You will be able to pause during the survey and restart at a later time if you wish.

If you would like to review the survey in advance, you can download a copy [here](#).

All survey responses will be reviewed and a summary of the results will be posted online following the close of the consultation. The identity of all individual respondents will be kept strictly confidential.

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### **About You**

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Do you live in...

- Ontario
- Rest of Canada
- Outside of Canada

Prefer not to say

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Are you a...? (Select one)

- Physician (including retired)
  - Medical student
  - Member of the public
  - Other health care professional (including retired)
  - Organization
  - Prefer not to say
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Please tell us which organization you are responding on behalf of:

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The following questions will ask you about the draft *Delegation of Controlled Acts* policy which sets out expectations about when and how to delegate controlled acts appropriately. Controlled acts include, for example, communicating a diagnosis, administering a substance by injection or inhalation, and prescribing a drug.

The term delegation has a very specific and technical meaning that is defined in the policy however, it is also used more generally in everyday conversation to refer to delegating tasks to staff or providing orders to other health care professionals.

In order to clarify the circumstances covered by the policy the draft states that delegation does not include assigning a task that is not a controlled act (e.g., taking a patient's history), nor does it include ordering the initiation of a controlled act that is within the scope of practice of another health care professional (e.g., an initiating order for a nurse or other health care professional).

Please indicate the extent to which you agree or disagree that this addition clarifies the scope of the policy:

- Strongly agree
  - Somewhat agree
  - Neither agree nor disagree
  - Somewhat disagree
  - Strongly disagree
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Please feel free to elaborate on your answers above. (Optional)

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## **Patient Best Interests**

The draft policy retains the requirement that physicians only delegate controlled acts when doing so is in the best interest of the patient. It now also states that this includes only delegating when:

- the act can be performed safely, effectively and ethically;
- the patient's health and/or safety will not be put at risk;
- the patient's quality of care will not be compromised by the delegation; and
- delegating serves one or more of the following purposes:
  - promotes patient safety,
  - facilitates access to care where there is a need,
  - results in more timely or efficient delivery of health care, or
  - contributes to optimal use of healthcare resources.

The purpose of this addition was to help clarify appropriate instances of delegation by setting out a framework that needs to be satisfied in each instance.

Please indicate the extent to which you agree or disagree with the following statements:

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree
The framework is helpful in determining whether delegation is appropriate.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The framework is reasonable.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Are there any factors missing from this framework? If so, what are they?

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Please feel free to elaborate on your answers above. (Optional)

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### **Delegating in the Context of a Physician-Patient Relationship**

The draft policy specifies the limited circumstances where it is appropriate to delegate in the absence of an established physician-patient relationship (i.e., where patient best interests dictate doing so, in the context of a public health initiative or other public safety program, or as part of established protocols in a hospital setting).

Are there any other circumstances where it might be appropriate to delegate in the absence of an established physician-patient relationship? If so, please tell us when this might be appropriate.

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## Ongoing Delegation

In order to clarify that delegation is intended to be a physician-extender and not a physician replacement the draft policy sets out new expectations for instances where delegation is ongoing.

Please indicate the extent to which you agree or disagree that the following expectations regarding ongoing delegation are reasonable:

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree
Physicians must ensure that patients are informed of who the delegating physician is.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Physicians must ensure that patients have the option of speaking with the physician if they wish to.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Physicians must re-assess the patient to ensure that delegation continues to be in the patient's best interest when there is a change in the patient's clinical status or treatment options.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Physicians must re-assess the patient to ensure that delegation continues to be in the patient's best interest when the patient has requested to see the physician.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Please feel free to elaborate on your answers above. (Optional)

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## Consent

Thinking about consent, the draft policy requires that consent be obtained for the treatment but does not require that consent be obtained for the delegation itself.

Please indicate the extent to which you agree or disagree with this position:

- Strongly agree
  - Somewhat agree
  - Neither agree nor disagree
  - Somewhat disagree
  - Strongly disagree
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Please feel free to elaborate on your answer above. (Optional)

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## Supervision and Support of Delegates

The draft policy requires that physicians provide a level of supervision and support that is proportionate to the risk associated with the delegation and that is reflective of the following factors:

- the specific act being delegated;
- the patient's specific circumstances (e.g., health status, specific health-care needs);
- the setting where the act will be performed and the available resources and environmental supports in place; and
- the education, training and experience of the delegate.

Please indicate the extent to which you agree or disagree that these are the right factors for assessing risk:

- Strongly agree
  - Somewhat agree
  - Neither agree nor disagree
  - Somewhat disagree
  - Strongly disagree
- 

Are there any factors missing that should be included for consideration when determining appropriate supervision?

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When supervising delegates, the draft policy does not require physicians to be onsite in all instances. Instead it requires physicians to use their judgement depending on the specific circumstances of the delegation.

Please indicate the extent to which you agree or disagree with each of the following statements related to supervision:

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree
There are times where it would be appropriate for physicians to supervise delegates without being onsite.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are instances where in-person supervision of delegates is necessary.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree
There are instances where being available by phone is sufficient for the purposes of supervision.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are instances where being available to attend in-person if necessary is sufficient for the purposes of supervision.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It would be reasonable to require onsite supervision in all instances of delegation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If onsite supervision was required in all instances it would negatively impact the delivery of care (e.g. compromise access, efficiency, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please feel free to elaborate on your answers above. (Optional)

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## Draft Policy

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In order to answer the next few questions, it is important that you have read the draft *Delegation of Controlled Acts* policy. If you have not read the draft policy, you will be skipped to the next section; however, the answers you have provided to all previous questions will still be submitted.

If you would like, you may take a moment to read the draft policy by clicking [here](#).



Have you read the draft *Delegation of Controlled Acts* policy?

Yes

No

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We'd like to understand whether the draft policy is clear and comprehensive. Please indicate the extent to which you agree or disagree with each of the following statements regarding the draft policy.

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree
The policy is clearly written.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The policy is easy to understand.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The policy includes definitions of all essential terms.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is clear when it would be appropriate to delegate.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is clear how to appropriately delegate.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Please feel free to elaborate on your answers above. For example, how can we improve the policy's clarity? (Optional)

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The draft policy sets out expectations related to a number of aspects of delegation including, for example, supervision and evaluation of delegates, and documentation when delegating.

Is there any additional guidance that would be helpful to include in the policy? (Optional)

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## Draft Advice

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The following questions will ask you about the companion [Advice to the Profession](#) document.

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The draft *Delegation of Controlled Acts* policy has a companion document called [Advice to the Profession: Delegation of Controlled Acts](#). The purpose of this *Advice* document is to clarify and further explain the draft policy content.

In order for you to answer the next few questions, it is important that you have read the draft *Advice to the Profession* document. If you have not read the draft document, you will be skipped to the next section; however, the answers you have provided to all previous questions will still be submitted.

If you would like, you may take a moment to read the draft *Advice* document by clicking [here](#).

Have you read the draft *Advice to the Profession* document?

- Yes
  - No
- 

Are there topics or issues that you think could benefit from additional detail, explanation, or examples that should be addressed in the *Advice* document?

- Yes
  - No
  - Don't know
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Please feel free to elaborate. (Optional)

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Does the draft *Advice* document contain content that you feel is unnecessary and should be removed? (Optional)

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**End**

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If you have any additional comments that you have not yet provided on the draft policy or *Advice* document, please provide them below, by [email](#), or through our [online discussion forum](#).

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**Thank you!**

Those are all the questions we have for you today.

Once a final policy has been approved by CPSO Council, the policy will be posted on the CPSO website.

Please see our [consultation webpage](#) for more information on CPSO's policy review and consultation process.