

November 16, 2020

College of Physicians and Surgeons of Ontario
80 College Street
Toronto, ON
M5G 2E2

Dear Sir/Madam:

On behalf of Toronto Paramedic Services (TPS), please accept this submission in response to the CPSO's request for comment on the draft *Delegation of Controlled Acts* policy. TPS welcomes this opportunity and we appreciate that the CPSO is open to feedback and recommendations about its policies through its preliminary consultation process.

TPS is the largest municipal ambulance service in Canada. It employs more than 1,200 Paramedics who respond to more than 300,000 emergency medical calls per year in and around the city.

For more than 30 years, Medical Directors have delegated controlled acts to TPS' Paramedic staff. Toronto Paramedics receive medical delegation for controlled acts from TPS itself and from the Ontario Base Hospital Group. TPS and the Base Hospital (BH) are distinct entities, each with their respective Medical Director(s) and/or delegating physicians. Each of these physicians (whether from TPS or the BH) is capable of delegating medical acts in keeping with the CPSO policy. TPS' delegating physician is an employee of the City of Toronto and holds a fully independent registration with the CPSO.

TPS has also delivered Community Paramedicine programming for more than 20 years, during which time the TPS Medical Director has been responsible for delegating controlled acts. Community Paramedicine helps connect patients with the healthcare system outside of the traditional 911 medical emergency response. Community Paramedics are highly skilled in patient education and advocacy and seek to match each patient's unique needs to the most appropriate care through a focus on health promotion and injury prevention. More specifically, Community Paramedicine programming supports:

- Vulnerable and at-risk populations such as complex care cases, populations with targeted chronic diseases (e.g., diabetes mellitus, hypertension, asthma, COPD, CHF)

- Administration of influenza immunizations
- Operation of coronavirus testing centres specifically for fire, police, and paramedic personnel and their families
- Assistance with coronavirus testing in congregate settings, such as shelters, long-term care facilities, and for other vulnerable populations
- Immunization program for eventual availability of a COVID-19 vaccine

Paramedics work in many unique environments. It is our recommendation that the CPSO policy clearly recognize the unique setting in which the paramedic carries out delegated controlled acts on a case-by-case basis without direct involvement of the delegating physician. The delegating physician is typically only involved in developing the guiding documents (medical directives, etc.) for these acts on a system-based level, but not at the frontline level of the individual patient. We, therefore, respectfully submit that the CPSO policy also more clearly identify appropriate circumstances in which delegation may occur (such as controlled acts delegated to Paramedics) in the absence of a direct physician-patient relationship.

TPS appreciates the opportunity to participate in this preliminary consultation and welcomes the opportunity to work with the CPSO to make improvements to the *Delegation of Controlled Acts* policy in the coming months.