

# Ontario Medical Association Submission

**CPSO Ending the Physician Patient Relationship,  
Treatment of Self, Family Members, and Others Close  
to You, and Accepting New Patients Policies**

February 2025



The Ontario Medical Association (OMA) appreciates the opportunity to provide feedback on the CPSO's revised policies currently under consultation:

1. **Ending the Physician-Patient Relationship**
2. **Accepting New Patients**
3. **Treatment of Self, Family Members, and Others Close to You**

We recognize and appreciate that the CPSO has incorporated many of the OMA's recommendations from the initial consultation process. Accordingly, our submission primarily focuses on key recommendations that were not integrated into the revised policies. We request that the CPSO reconsider these points to ensure greater clarity and alignment with physician practice realities.

### **Ending the Physician Patient Relationship**

#### **Provision 6b:**

In our preliminary submission, we raised concerns regarding the expectation that physicians individually assess each patient's circumstances, including the patient's vulnerabilities and the patient's ability to find alternative care in an appropriate timeframe, when significantly downsizing their practice. This requirement imposes an unrealistic and overly burdensome obligation on physicians. We recommend modifying this provision to allow for practice-wide interventions or changes, rather than mandating individual patient considerations.

Additionally, we suggested providing clearer definitions and examples of the term "vulnerable", as its current ambiguity leaves significant room for subjective interpretation. To improve clarity, we propose that the policy explicitly define "vulnerable patients" to include (for example, "those requiring urgent access to care, those with chronic conditions, particularly where the chronic condition is unmanaged, an activity-limiting disability and/or mental illness", as defined in the *Accepting New Patients* policy (higher need and complex patients). Outlining these specific examples would help physicians understand and apply the policy more consistently and mitigate the risk of misinterpretation.

#### **Provision 7b:**

This provision states that physicians must provide written notification to every patient when ending the physician-patient relationship. We previously recommended including clarification that these requirements do not apply in cases where treatment has reached its expected conclusion. This addition would help mitigate potential misunderstandings and ensure that patients do not mistakenly believe they are entitled to ongoing care unless formally discharged.

## **General Comments on Ending the Physician- Patient Relationship and Accepting New Patients Policy**

The OMA acknowledges the CPSO's intent to ensure patients have access to physician care through these policies. However, we urge the College to consider the broader systemic challenges impacting care provision, particularly the ongoing crisis in family medicine and widespread access issues across the healthcare system. While physicians have a fundamental responsibility to provide care and adhere to CPSO policies, their ability to do so is continuously undermined by growing system constraints. We encourage the CPSO to take these realities into account when finalizing these policies to ensure they support both patient access and also what is ultimately a system responsibility

### **Treatment of Self, Family Members, and Others Close to You:**

#### **Advice document:**

The OMA strongly encourages the CPSO to retain key guidance from the existing Advice Document related to referrals, documentation, and communication with other healthcare professionals. Specifically, the current policy outlines expectations for physicians when communicating with a family member's primary care provider and considerations for maintaining confidentiality. Additionally, the current Advice Document offers valuable guidance on whether it is appropriate to make referrals for oneself, family members, or close relations. We believe these elements provide critical context and should be maintained in the revised version.

#### **Conclusion**

We appreciate the CPSO's commitment to revising these policies in a way that balances regulatory oversight with the practical realities of medical practice. We hope the feedback outlined above will be given further consideration as the CPSO finalizes these policies. We welcome the opportunity for further discussion on these important issues.