

Hello: I am an employer of an amazing Physician Assistant working in a busy primary care office at a rural Family Health Team. It is great that we are finally getting close to regulating PAs as a lack of regulation has been a barrier to practising PAs, employers of PAs, and patients seeking access to care. There is a lack of understanding among the public and health care providers about Physician Assistants and it is important that regulating PAs will increase clarity.

A few comments about the draft:

- I understand that some PAs work in psychiatry across the province providing psychotherapy. Restricting PAs from providing psychotherapy is a major concern, especially given the rising mental health issues and the demands on the current system.
- The language around sub-delegation in the draft is concerning. It is likely that it will be interpreted by team members such as nurses, pharmacists, and diagnostic techs that they can't accept orders, prescriptions, and requisitions from PAs. This will create a significant barrier of access to care for our patients and significant inefficiencies and confusion in the system about PAs.
- Ensuring PAs have a voice on CPSO Council is important. The regulation should address and require PA representation on CPSO Council.
- PAs need title protection. It is important that the public, employers, and patients understand what a PA is and not be confused by a "medical assistant" with no medical background/training/certification.
- It seems that the document mainly focuses on delegation. In the current state where PAs are not working independently and requiring legal supervision of a physician, this makes sense. However, regulation of PAs will provide an outlined scope of practice and when regulated, we would expect that PAs should be practising to their full scope in keeping with the area of their supervising physician. This would mean that delegation is implied by hiring a PA and therefore direct order or medical directive is not necessary. This is not reflected in the document. Scope for PAs should be associated with the profession as a whole rather than ad hoc directives that vary by PA.