



July 21, 2023

By E-mail

College of Physicians and Surgeons of Ontario
80 College St.
Toronto ON M5G 2E2

To Whom It May Concern:

Re: Proposed Regulatory Amendments to Regulate Physician Assistants

The College of Nurses of Ontario (CNO) is grateful for the opportunity to provide feedback on the College of Physician and Surgeons of Ontario's draft Physician Assistant (PA) regulations. In particular, we are providing feedback related to the draft regulation's stipulations regarding delegation.

In relation to subsection 52(1) of the proposed regulations, given that the *Regulated Health Professions Act, 1991* (RHPA) enables the delegation model which is now used to delegate to regulated care providers and unregulated care providers, is CPSO intending to restrict delegation so that only physicians can delegate to PAs? Might this have unintended consequences given that other regulated healthcare professionals can currently delegate to PAs under the RHPA model?

We support proposed subsection 52(3) which specifies that "a member who is a physician assistant shall not delegate the performance of an act that has been delegated to them" (i.e. that sub-delegation is prohibited). This aligns with [provincial guidance](#) through the Health Profession Regulators of Ontario (HPRO) as well as regulations under the *Nursing Act, 1991* (see subsection 41(1) in regulation 275/94).

CNO values and appreciates the collaborative efforts across our regulatory jurisdictions. Thank you again for the opportunity to provide feedback. Should you require further information, or if you wish to discuss our response, please contact [REDACTED].

Sincerely,

[REDACTED]

Silvie Crawford, RN, BHScN, LLM-Health Law
Executive Director and CEO