



January 5, 2023

ATTN: Professional Regulation and Oversight Branch
Health Human Resources and Labour Relations Division
Ministry of Health
1515 Blanshard St., Victoria, BC
PROREGADMIN@gov.bc.ca

RE: Proposed LPN, RN, and RPN Regulatory Amendments

Good afternoon:

On Oct. 7, 2022, the Ministry of Health proposed amendments to the Nurses (Registered) and Nurse Practitioners Regulation, the Nurses (Registered Psychiatric) Regulation, and the Nurses (Licensed Practical) Regulation. These proposed amendments enable a new domain of Certified Practice for Registered Nurses (RNs) and the establishment of British Columbia's first domain of Certified Practice for Registered Psychiatric Nurses (RPNs), both specific to the diagnosis and treatment of Opioid Use Disorder (OUD). These proposed amendments also enable the provision of orders by Certified Practice RNs and RPNs to RNs, RPNs, and LPNs without certification for the purpose of OUD treatment.

As the professional association representing all four nursing designations in British Columbia, NNPBC applauds the step forward that these proposed regulatory amendments represent. The addition of OUD as a domain of RN Certified Practice and the establishment of RPN Certified Practice is a bold and significant step in supporting British Columbians living with OUD. The use of the regulatory framework for Certified Practice to enable advanced nursing practice in this area is also prudent and ensures nurses are supported with the competencies and decision support tools they need to provide excellent, autonomous nursing care.

We are please to submit comments on these proposed amendments, which you will find enclosed. These comments come directly from our RN and RPN members, who stepped forward with their comments through online engagement. If there are questions regarding these comments or if we can provide more detail in certain areas, please do not hesitate to connect with us.

Respectfully,

Angela Wignall, RN, BSN, BA, MA
Director, Professional Practice & Health Policy Implementation
Nurses and Nurses Practitioners of BC



Opportunities Enabled by Proposed Regulatory Amendments

- Supports optimization of RN and RPN scopes of practice
- Situates OUD diagnosis and treatment within the therapeutic relationships people living with OUD already have with nurses
- Regulating OUD practice by RNs and RPNs as a Certified Practice enables safety both for the nurses providing care and also for the people receiving care
- Reduces barriers to access currently being experienced by people living with OUD, specifically by adding to care providers available to meet their needs, working around existing bottlenecks
- Addresses barriers experienced by rural and remote nurses who have endeavoured to become nurse prescribers under the temporary Public Health Officer Order but who do not have access to other prescribers. Certified Practice enables autonomous care by nurses in the rural and remote settings where it is highly needed
- Access to a Certified Practice RN or RPN with a focus on OUD reduces barriers to care for marginalized peoples without access to traditional care pathways

Challenges Introduced by Proposed Regulatory Amendments

- Certified Practice and the accompanying required competencies and decision support tools are distributed across a multitude of named agencies, making consistency of practice supports and guidance confusing and difficult to navigate. Streamlining of Certified Practice as well as related practice supports and guidance for Certified Practice is needed so that nurses engaged in Certified Practice are supported in providing safe, evidence-informed care
- Existing education options for becoming a nurse prescriber for OUD and for becoming a Certified Practice nurse are not currently aligned. A clear, coordinated approach to implementing these regulatory changes must include aligning OUD education with Certified Practice education and the specific development of education options for RPN in Certified Practice as a new domain of RPN practice
- Clarity around what competency looks like in this practice is needed, as is clarity on what continued competency, education, and professional development/continuous learning look like for RN and RPNs in Certified Practice for OUD.
- While many nurses receive some training in pharmacology during undergraduate education, adequate training for prescribing in Certified Practice is needed to enable safe implementation of the regulatory amendments
- Practice standards and resources for prescribing need to be developed to support prescribing in Certified Practice, including for OUD
- Nurses currently interested in becoming OAT prescribers under the temporary Public Health Officer Order have struggled with employer-level controls on practice. Additionally, employers including Health Authorities, are under-informed regarding Certified Practice and what is required to enable autonomous nursing practice within a Certified Practice domain. Implementation of the regulatory amendments must include targeted efforts to remove employer-level barriers, including encouraging employers to understand Certified Practice and to enable certified RNs and RPNs to work to their full scope
- Nurses remain committed to advocating for fully integrated care for the prevention, assessment, and treatment of OUD, including access to rehabilitation services. While the proposed regulatory amendments enable a significant step forward for OUD diagnosis and the prescribing of controlled drugs for OUD treatment, investment in wrap around rehabilitation care is also urgently needed