COLLEGE OF NURSES
OF ONTARIO
ORDRE DES INFIRMIÈRES
ET INFIRMIERS DE L'ONTARIO

THE STANDARD OF CARE.
L'EXCELLENCE EN SOINS

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November 17, 2014

By E-mail

Suzanne McGurn
Assistant Deputy Minister
Health Human Resources Strategy Division
Ministry of Health and Long-Term Care
900 Bay Street
Macdonald Block, 2nd Floor, Room M2-61
Toronto ON M7A 1R3

Dear Ms McGurn:

We are pleased to provide the College of Nurses of Ontario's (the College's) response to
the October 4, 2014 letter from Minister Hoskins and your letter of October 28, 2014.

The concept of transparency is threaded throughout the College's Strategic Plan. Our
strategic objectives of building confidence in nursing regulation, advancing the use of
College knowledge, and leading in regulatory excellence all require transparency in
regulatory processes.

We are strongly committed to ensuring that Ontarians receive safe and ethical nursing
care. We understand that to support this, they need to have clear, informative, useful and
relevant information about nursing, nursing regulation and about our members.

The College of Nurses is currently doing the following to increase transparency to the
public and its members:

Improving our communications:

The College is implementing an extensive strategic communications plan. This plan is
focused on providing key audiences – including the public, applicants and our members –
with the information that they require in a way that they understand. The College is
currently undertaking a review of the information on our web site to make sure it is clear
and understandable and meets the needs of the public, applicants, members and other
stakeholders.

To meet the objectives of our strategic communications plan, we have an organization-
wide clear language initiative in progress. The College is working to ensure that all of

the College's communications channels (e.g. web site, *Find a Nurse*, social media outlets, correspondence) are clear and meet the information needs of the intended recipients.

The College has recently begun to proactively address public interest concerns on our website and our social media outlets. For example, in response to recent media articles on the inappropriate accessing of the health records of a high profile patient by nurses, the College posted a clear message for the public outlining our expectations for nurses regarding confidentiality and privacy of patient records and the actions we might take when these expectations are breached. The College will continue to identify opportunities to provide the public with timely information that will support their understanding of nursing regulation.

Leading the commitment to transparency through active participation in the Advisory Group for Regulatory Excellence (AGRE):
As a founding member of AGRE, the College has demonstrated a strong commitment to working collaboratively with regulatory colleagues to identify innovative opportunities to improve regulation in the interests of the public. The members of AGRE all recognize the importance of public confidence in regulation and have a strong commitment to take the action needed to build and maintain that confidence.

The College has been an active participant in all aspects of the AGRE transparency project. A table identifying the actions we have committed to or are bringing to our Council in December, with our targets for completion, is attached.

Several of these major decisions and targets related to the AGRE Transparency Project are:

- In September of 2013, Council supported the AGRE transparency principles as a foundation for further work in transparency; and

- In June of 2014, Council members supported the Phase 1 transparency recommendations.

- In December of 2014, Council will:

  - Review, for circulation, proposed By-Laws related to Phase 1 of the project. These amendments will return to Council in March of 2015 for final decision; and

  - Review for approval the Phase 2 recommendations, including enhancing information related to decisions of the Inquiries, Complaints and Reports Committee. These recommendations will be the basis for the development of further by-law amendments which will be reviewed for publication in March of 2015 and for final decision in June of 2015.

Significant challenges:
The College has significant challenges. We have a very large membership and an extensive database that supports the register and health human resource planning.

We are in the middle of a major project to revamp our work processes and replace our information system with one that supports:

- increased automation and enhanced communications with all of our stakeholders, including the public; and

- an enhanced capacity to collect, analyze and present data based on the information we collect through our processes.

When completed, these changes will support us in our commitment to continually enhancing transparency.   This is a multi-year project and it is highly resource intensive. It relates to the College's database, which supports the register; the staff involved in this work will also be involved in some of the steps we are taking to enhance transparency.

The College is committed to moving ahead on transparency as quickly as possible. We reviewed our timelines carefully to be sure that we can be confident that any additional information included on the register is complete, accurate and user-friendly, and that the timelines we commit to are achievable.

In relation to matters you raised specifically in your letter:

Information for applicants:
We are constantly reviewing the information we provide to applicants to ensure that it is useful and that they can understand our processes and expectations.   Our communications with applicants is our first priority as we roll out our clear language initiative. The first phase of our new information system, which will go live in mid-2015, is also focused on applicants. It will support on-line applications. All applicants will be able to apply on line and self-monitor the status of their applications.

We survey all new members, including international applicants, about the application process.   Their feedback has supported us in providing greater clarity to applicants around processes and timeframes. It has also assisted us in identifying process improvements.

We have chosen the opportunities for improvement by engaging in the self-assessment processes of the Office of the Fairness Commissioner. As with all regulators, our registration practices and processes are also reviewed annually by the Office. We post our action plan in response to the recommendations on our website.

Information about Council and Committees:
There is currently information on the roles and members of Council and committees on our web site. We currently provide the agendas and minutes for Council meetings. Beginning with the December 2014 Council meeting, a PDF of the briefing materials for Council meetings will also be provided on the web site.

Council has made a commitment to an extensive multi-year governance review to begin in 2015. The goal of that review is to ensure that Council is a leader in regulatory governance – well positioned to make the best decisions in the public interest. One of the issues Council will explore is the transparency of its processes and decision-making and its provisions related to conflict of interest. We expect that there may be new information about Council and committees following this process.

Information about regulatory processes:
The complaints process provides members of the public with a way to share concerns about nursing practice with the College. Our public page on the web site clearly addresses how to make a complaint. We have also provided a clear language handbook called *Addressing Complaints at the College of Nurses of Ontario*. This resource reviews the complaints process and what a member of the public can expect.

To support a process and information that works for complainants, the College conducts a monthly survey of complainants and nurses involved in the complaints process. This survey provides the College with the knowledge we need to hone our information for the public and improve our complaints processes.

We recognize that, in addition to setting expectations for our members, our practice standards and guidelines inform the public of what they can expect from a nurse. All of our practice standards and guidelines are available on the College's website.

We are reviewing our approach to practice standards, with a goal of making them clearer and more user friendly for our members. We expect this new approach, in addition to enhancing ease of use for nurses, will result in documents that are also better understood by members of the public. We have started with revisions to the *Medication Practice Standard* which will be reviewed by Council in 2015.

For the Council and staff of the College, transparency is a fundamental value and a commitment. It is not a project or "quick fix". Rather, it is integrated into everything we do. The steps we are taking to implement our Strategic Plan will enhance our transparency.

The College is committed to ongoing evaluation of our programs and information against the lens of transparency – are we providing the needed information in a clear, complete, relevant and understandable way?   We understand this is one of our accountabilities in taking on the privilege of regulating the nursing profession in Ontario.

We would be glad to respond to questions or discuss this further with you. Please contact Anne Coghlan, Executive Director and CEO if you wish further information.

Sincerely,

Anne L. Coghlan, RN, MScN   Angela Verrier, RPN
Executive Director and CEO   President

AC/jh

Enclosure: Table on implementation of transparency recommendations

College of Nurses of Ontario
Implementation of Transparency Recommendations

Recommendation	Status Update and Implementation Targets
Phase 1 – Register Information:	
1. **Date referred to Discipline Committee**	Already included in Find a Nurse
2. **Discipline Committee status**	Already included in Find a Nurse, except for matters that are under reserve, included in draft by-laws going to Council for approval for circulation: **December 2014** Final by-law to Council: **March 2015** Planned implementation date: **December 2015**
3. **Full Notice of Hearing**	Draft by-law to Council for approval for circulation: **December 2014** Final by-law to Council: **March 2015** Planned implementation date: **December 2015**
4. **Criminal findings of guilt (relevant)**	
5. **Bail conditions (relevant)**	
6. **Non-members practising illegally**	Already available on the College website
Phase 1 - Other actions:	
7. **Enhanced website description of what member info is/is not available**	Completion of this task is linked to the changes to the register and will occur in two phases: Phase 1: **December 2015** Phase 2: **September 2016**
8. **Public information available promptly on website**	The College currently updates the register within 1 to 2 working days from receipt of the documentation. This timeframe will continue as our standard.
9. **Consistent approach to number and names of ICRC outcomes, definitions and criteria**	Agreement reached through AGRE Planned implementation at Inquiries, Complaints and Reports Committee: **July 2015**

Recommendation	Status Update and Implementation Targets
10. **Review of public register using the best practice guidelines and recommendations to evaluate navigation, search, information access, clarity and relevance[1].**	Based on AGRE best practice guidelines that are targeted for February 2015, the reviews will take place together with implementing the Phase 1 and Phase 2 register changes, with the following deadlines: Review of register including Phase 1 changes: **December 2015** Review of register including Phase 2 changes: **September 2016**
Phase 2:	**NOTE:** These changes will be addressed as part of the College's new information system. The system changes to support the register are scheduled to "go live" in the mid- to late summer of 2016
1. Names of former members (fact + date of death, if known)	Already included in Find a Nurse
2. Health facility privileges	Draft by-law to Council for approval for circulation: **March 2015** Final by-law to Council: **June 2015** Planned implementation date: **September 2016**
3. Criminal charges (relevant to practice)	
4. Known licences in other jurisdictions	
5. Known discipline findings in other jurisdictions	
6. Discipline Committee - No findings	This requires legislative change and is outside of the College's control.
7. Undertakings	Some undertakings are currently on Find a Nurse. To meet the Phase 2 recommendations, all undertakings will be on Find a Nurse. Draft by-law to Council for approval for circulation: **March 2015** Final by-law to Council: **June 2015** Planned implementation date: **September 2016**
8. ICRC: Oral cautions	Draft by-law to Council for approval for circulation: **March 2015** Final by-law to Council: **June 2015** Planned implementation date: **September 2016**
9. ICRC: SCERPS	

[1] The AGRE Communications Working Group will develop best practice guidelines and recommendations based, in part, on report from CPSO commissioned external review of their website.

Recommendation	Status Update and Implementation Targets
10. Increased focus on data analysis to inform regulatory activities and public reporting	The College's new information system will allow for the collection of significantly enhanced data about members and about College processes. As processes are integrated into the new system, enhanced data collection will allow for analysis and enhanced reporting on regulatory effectiveness to Council, to nurses and to the public.
Other: Key challenges to impact Phase 2 implementation	Size of the College's membership The College is in the middle of a multi-year project to transform workflow and automate processes. The project is resource intensive. Many of the staff who would be involved in implementing recommendations regarding transparency will also be involved in the development of the new system.