



Supervision of Restricted Activities – For Your Consideration and Feedback

We seek your input into rules for physicians when supervising others in the performance of restricted activities. This article describes restricted activities, lists permitted restricted activities for several professions, and proposes standards for making decisions about supervising other persons in the performance of restricted activities.

The practice of medicine is increasingly reliant on a growing array of healthcare professionals and other trained workers to deliver care to patients. Many of the tasks performed by non-physicians involve direct contact with patients in ways that involve a significant risk of harm. Those activities are categorized in legislation (Schedule 7.1 of the *Government Organization Act*) as Restricted Activities. A list of restricted activities for medicine and the nursing professions is attached.

As each of the 28 regulated healthcare professions in Alberta come under the new *Health Professions Act*, each profession's regulatory authority defines which restricted activities are permitted for its members, including what additional training and/or workplace supervision, if any, is necessary to perform the restricted activity. A regulated practitioner is anyone who is registered with one of the 28 regulatory authorities. In most cases, regulated practitioners do not require supervision to perform many, or all, of the restricted activities approved for their profession.

Where a restricted activity is not approved for a profession, we are advised that regulated practitioners of that profession may not perform that restricted activity even under supervision by a regulated practitioner who is approved to perform the restricted activity.

A Registered Nurse, for instance, can inject a drug without supervision but is not permitted to prescribe a drug, whether supervised or not. A Nurse Practitioner is permitted both to prescribe and to inject a drug without supervision.

A permitted restricted activity, however, does not necessarily mean that a practitioner is qualified to perform all procedures that may fall under the description of the restricted activity. For information on which procedures a particular regulated practitioner may perform, it may be necessary to consult the Standards of Practice for the practitioner's profession or to consult directly with the practitioner's regulatory authority.

Unregulated workers, on the other hand, are not permitted to perform restricted activities except under the supervision of a regulated practitioner who is permitted to perform the restricted activity. For example, an unregulated worker cannot syringe an

ear ("to insert into the ear a liquid under pressure") or perform a diagnostic ultrasound examination ("to apply non-ionizing radiation in ultrasound imaging") or inject a vaccine without supervision by a regulated practitioner who is permitted to perform the restricted activity.

It is also important to know that an unregulated worker who is eligible for registration with a professional regulatory authority but who chooses not to be registered, or has been struck from his or her profession's register, is not permitted to perform a restricted activity, whether supervised or not.

Before supervising a regulated practitioner or an unregulated worker, a physician must ensure that the supervised person has the requisite knowledge and skills to perform the activity safely and effectively. Supervision does not mean delegation. The supervising physician always remains accountable for the actions of a supervised person, whether that person is the physician's employee or not.

Each profession will maintain Standards of Practice for supervising other persons in the performance of restricted activities. Such standards are intended to guide practitioners and to protect the public, and are a requirement of the *Health Professions Act*.

We propose and request your feedback on the following Standards of Practice for physicians:

1. A member of the College (physician, osteopath or – soon – podiatrist) may supervise another person in the performance of a restricted activity if the member:
 - i) is satisfied with the knowledge, skill and judgment of the supervised worker in performing the particular activity, or
 - ii) has confirmed that the supervised person is a student enrolled in a program that in the opinion of the Registrar of the College of Physicians & Surgeons of Alberta is a legitimate program to train persons to provide professional health services (e.g. medical student, nursing student, physical therapy student).
2. Notwithstanding section (1), a member of the College shall not supervise a person in the performance of a restricted activity if that person:
 - a) is eligible for registration in a healthcare profession in Alberta but is not registered with that professions' regulatory authority in Alberta (e.g. a person who completed nursing training but who is not registered with one of the three regulatory authorities in Alberta for nurses); or

b) is registered with a healthcare profession in Alberta but is not permitted by that professions' regulatory authority to perform that restricted activity (e.g. a nurse who is not permitted by his/her regulatory authority to perform a surgical procedure, whether under supervision or not).

3. A member of the College may supervise a regulated practitioner or an unregulated worker or a student in the performance of a restricted activity only if the member:

- i) is satisfied that it is safe and appropriate for the supervised person to perform the restricted activity on the particular patient;
- ii) is satisfied that the risk to the patient is not substantially greater than if the restricted activity was performed by the member;
- iii) is satisfied that the equipment and resources available for performance of the restricted activity are safe and appropriate; and
- iv) is satisfied that the patient or his/her guardian or authorized agent consents to the performance of the restricted activity by the supervised person, unless consent is not possible due to circumstances of a medical emergency.

4. A member who supervises a person in the performance of a restricted activity shall remain readily available during the performance of the restricted activity for:

- i) consultation with the person who is supervised, and
- ii) direct contact with the patient when the risks of the activity and the training of the supervised person are not appropriate for indirect or remote supervision.

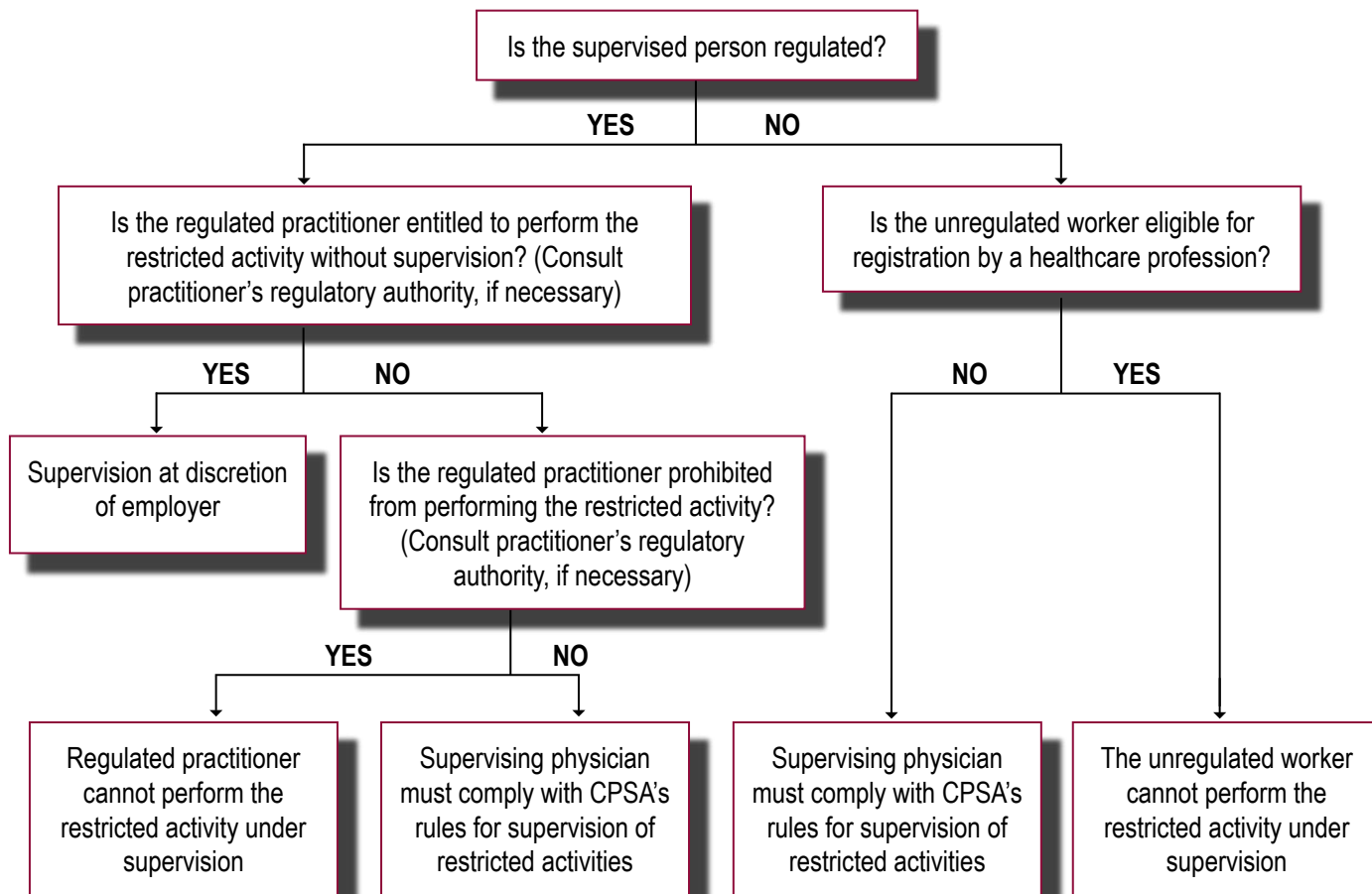
In replying to the proposed Standards of Practice for members of this College, please consider:

- Are the statements clear?
- Do the standards cover the issues of concern to you?
- What other information will you need to make decisions in your own practice?

It would be helpful if you included in your response the range of restricted activities currently performed by regulated and unregulated workers in your practice so that we can fully consider current patterns of reliance on supervised persons in medical practices.

Please send your comments to Dr. Bryan Ward, Deputy Registrar, at the College address or by e-mail to bward@cpsa.ab.ca. Receipt of comments by February 15, 2007 is appreciated.

Decisions for Physicians Supervising Others in Restricted Activities



Restricted Activities list

(Excerpted from the *Government Organization Act*, Schedule 7.1)

*Several conditions apply to activities approved for the nursing professions.
Consultation with the respective regulatory authority is recommended.*

Restricted activities

2.(1) The following, carried out in relation to or as part of providing a health service, are restricted activities:

- a) to cut a body tissue, to administer anything by an invasive procedure on body tissue or to perform surgical or other invasive procedures on body tissue:
 - i) below the dermis or the mucous membrane or in or below the surface of the cornea,
 - ii) in or below the surface of teeth, including scaling of teeth;
- b) to insert or remove instruments, devices, fingers or hands:
 - i) beyond the cartilaginous portion of the ear canal,
 - ii) beyond the point in the nasal passages where they normally narrow,
 - iii) beyond the pharynx,
 - iv) beyond the opening of the urethra,
 - v) beyond the labia majora,
 - vi) beyond the anal verge, or
 - vii) into an artificial opening into the body;
- b. 1) to insert into the ear canal:
 - i) under pressure, liquid, air or gas, or
 - ii) a substance that subsequently solidifies;
- c) to set or reset a fracture of a bone;
- d) to reduce a dislocation of a joint except for a partial dislocation of the joints of the fingers and toes;
- e) to use a deliberate, brief, fast thrust to move the joints of the spine beyond the normal range but within the anatomical range of motion, which generally results in an audible click or pop;
- f) to prescribe a Schedule 1 drug within the meaning of the *Pharmaceutical Profession Act*;
- g) to dispense, compound, provide for selling or sell a Schedule 1 drug or Schedule 2 drug within the meaning of the *Pharmaceutical Profession Act*;
- h) to administer a vaccine or parenteral nutrition;

DPM ¹	MD/DO ²	RN/NP ³	LPN ⁴	RPN/RMDN ⁵
✓	✓	✓	✓	✓
	✓	✓	✓	✓
	✓	✓		✓
	✓	✓	✓	✓
	✓	✓	✓	✓
	✓	✓	✓	✓
	✓	✓	✓	✓
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✓	✓	✓		
	✓			
✓	✓	NP ONLY		
✓	✓	✓		✓
	✓	✓	✓	✓

¹DPM = Podiatrist

²MD/MO = Physician/Osteopath

³RN/NP = Registered Nurse/Nurse Practitioner

⁴LPN = Licensed Practical Nurse

⁵RPN/RMDN = Registered Psychiatric Nurse/Registered Mental Deficiency Nurse

