

Murdock, Melissa HLTH:EX

From: Beckett, Daryl K HLTH:EX
Sent: Wednesday, August 6, 2014 8:31 AM
To: McLachlan, Debbie HLTH:EX
Cc: Brown, Kevin HLTH:EX
Subject: Re: Employed Student Psych Nurses

Just to be clear -- she thought that RN students were being hired as ESN after first year, and so that would make it easy for CRPNBC to adopt what CRNBC has done. I'm not sure if she knows what RPN students have attained before being hired into ESN-like roles currently.

From: McLachlan, Debbie HLTH:EX
Sent: Wednesday, August 06, 2014 08:18 AM
To: Beckett, Daryl K HLTH:EX
Cc: Brown, Kevin HLTH:EX
Subject: Re: Employed Student Psych Nurses

Thanks Daryl for the heads up. Concerning that are using after first year. Kevin and I will discuss issue.

From: Beckett, Daryl K HLTH:EX
Sent: Tuesday, August 05, 2014 12:05 PM Pacific Standard Time
To: Brown, Kevin HLTH:EX; McLachlan, Debbie HLTH:EX
Subject: FW: Employed Student Psych Nurses

I spoke with Kyong-ae this morning. She advises they are being pressed by CNOs to move on this. Apparently some HAS particularly Fraser have been hiring psych nurse students without understanding, until recently, that they are not regulated by CRPNBC in the way ESNs are regulated by CRNBC. She is not aware of the arrangements if any between employer and union that supports an employed psych nurse student program, and she is under the impression that ESNs are being hired after completing first year not second. CRPNBC isn't all that keen to pursue this unless HAS and MOH really want it, and to the extent possible would like to copy whatever CRNBC has done for ESNs. I suggested she indicate to Sherry that CNOs need to approach your area directly to ascertain whether MOH supports this as a policy direction before any bylaw drafting and other implementation work is done by CRPNBC.

Daryl K. Beckett, JD | Director, Professional Regulation | Health Sector Workforce Division | BC Ministry of Health | 250-952-2303 | [Professional Regulation Home](#)

From: Kyong-ae Kim [mailto:KKim@crpnbc.ca]
Sent: Wednesday, July 16, 2014 7:18 PM
To: Beckett, Daryl K HLTH:EX
Subject: Employed Student Nurses

Daryl, I would like to arrange a time to talk with you about the possibility of psychiatric nursing Employed Student Nurses (ESNs). As you may recall, CRNBC regulates ESNs as a class of registrant, but we do not. However, the health authorities have indicated to us that they would like CRPNBC to also regulate ESNs. The attached letter from the CNO Council indicates this. After considering the circumstances, our Board has given the go ahead to moving forward with a bylaw change to permit regulation of psychiatric nursing ESNs. The Board is aware this will involve a great deal of work and resources on our part.

To assist in our discussion, I am including below excerpts from a memo I did to our Board, which provide more background information. I would like to discuss whether you see any problems with what we propose to do and what advice you may have regarding the potential bylaw revisions.

I am available Friday morning, or next week on Monday (except for a mid day appointment), Thursday or Friday. Please let me know when would be good for us to talk, and I will send an Outlook invitation. Thanks,

Kyong-ae

CRNBC defines **Employed Student Nurse** as: "The employment role in which a nursing student is employed in a health care setting during or between terms of their education program, in accordance with CRNBC Bylaws. Being an employed student nurse offers students the opportunity to consolidate skills learned during their nursing education program."

By definition, ESNs are employed and are not the same as students doing a clinical placement as part of their practicum.

The legal authority for an ESN to perform any activity within the scope of a Registered Nurse exists only through regulatory supervision. Within the framework of the *Health Professions Act*, only a registrant of that same profession can provide regulatory supervision.

In other words, an ESN cannot practice within a nursing scope unless they are regulated. Without regulation, they are no different from an unregulated healthcare worker, which is how student nurses were employed in the past. As an unregulated healthcare worker, what they are permitted to do must be defined by the employer rather than a legislated scope of practice. One benefit of allowing ESNs is that the student has the opportunity to integrate theory into practice and potentially graduate with a more integrated set of nursing competencies.

CRPNBC's bylaws provide for a student class of registration, but this has never been implemented. There is no class of registration for ESNs.

Since the development of the registered nurse ESN role, some health authorities have hired psychiatric nursing students as "ESNs." While most health authorities hire only 2 or 3 a year, Fraser Health hires approximately 80 per year.

There are approximately 400-500 psychiatric nursing students in BC at any given time. Of these, only second and third year students would be eligible for an ESN position, i.e., approximately 160.

This year, several health authorities have contacted us regarding the legislative authority for psychiatric nursing ESNs to practice. This is probably due to the increased interest around the regulatory environment that we are seeing from employers.

What we have found is a lack of understanding among health authorities about psychiatric nursing "ESNs." Some appear to have assumed that psychiatric nursing ESNs are regulated by CRPNBC, just as CRNBC regulates their ESNs. Others are aware that we do not regulate ESNs but appear not to have thought through the issue of the scope of practice of psychiatric nursing ESNs. One health authority indicated that psychiatric nursing ESNs perform nursing activities based on decision support tools. So the employer is defining the role. However, this does not address the question of the underlying authority to perform a restricted activity.

There may be some leeway at the moment since the list of restricted activities under the *Health Professions Act* has not yet been proclaimed and brought into force. So, arguably, there are no legislated restrictions on psychiatric nursing "ESNs" performing these activities. However, this is a doubtful argument since if a healthcare worker cannot perform a restricted activity, it is hard to justify a rationale for student psychiatric

nurses performing them. In any case, the problem becomes acute once the list of restricted activities is proclaimed.

At that point, unless CRPNBC regulates ESNs, or employers are willing to set up formal delegation of activities to psychiatric nursing ESNs (an onerous process), they will be limited to doing only what any other unregulated healthcare worker can do.

The regulation of ESNs would require: passing a bylaw for a new registrant category, arranging insurance, setting fees, modifying our online registration system, creating a practice standard for ESNs, admitting and removing each ESN to the register at the beginning and end of their period of employment each year, and monitoring their practice (complaints, inquiry, discipline).

Kyong-ae Kim, LL.B. (Ms) | Executive Director/Registrar
College of Registered Psychiatric Nurses of British Columbia
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Regulating psychiatric nurses to ensure safe and ethical care

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June 3, 2014

Kyong-ae Kim, LL.B. (Ms)
Executive Director/Registrar
College of Registered Psychiatric Nurses of British Columbia
#307 – 2502 St. Johns Street
Port Moody, BC V3H 2B4

RE: Psychiatric Nursing Student Regulation by the College of Registered Psychiatric Nurses of British Columbia (CRPNBC)

Dear Ms. Kim,

On behalf of the BC Chief Nursing Officer (CNO) Council of BC, I am writing to follow up on some recent discussions between health authority stakeholders and CRPNBC related to the regulation of psychiatric nursing students to support their participation in the Employed Student Nurse (ESN) program within BC health authorities.

As you may know, the ESN program supports regulated nursing student employment in the health authorities to develop and integrate their nursing knowledge and skills within the workplace environment. Currently, the ESN program is available to students within registered nursing programs in BC. In collaboration with employers and as per the College of Registered Nurses of BC (CRNBC);

“In British Columbia, if a student nurse is employed in a health care setting and carrying out nursing activities they must be registered with CRNBC as an employed student nurse. They must work under the supervision of a named registered nurse.

Employed student nurses must be enrolled in good standing in an entry-level nursing education program during the employment period.”

<https://crnbc.ca/WhatNursesDo/TypesOfNurses/Pages/EmployedStudentNurse.aspx>

In order to facilitate psychiatric nursing student participation in the ESN program, registration with CRPNBC is required by the health authorities. Employing psychiatric nursing students as unregulated care providers does not meet the intent of the ESN program, and does not allow the student to develop and integrate their psychiatric nursing skills within the practice environment.

In addition, the student could be expected to achieve the requirements of other provider designations, either regulated or unregulated (e.g. LPN, HCW, Care Aide) to provide direct patient care within our environments, which would not meet the intent of carrying out nursing activities that utilize their developing competencies in psychiatric nursing.

Given the importance placed on psychiatric nursing in BC and the value of psychiatric nursing students participating in the ESN program, the CNOs would like to support any discussions you may be considering at CRPNBC regarding pursuing the regulation of psychiatric nursing students which would support their employment in this capacity.

The CNO's appreciate your consideration of this request and look forward to your response. Please let me know if other information is required.

Sincerely,



Sherry Hamilton,
Chief Nursing & Liaison Officer
Provincial Health Services Authority

cc. BC CNO Council

Murdock, Melissa HLTH:EX

From: Beckett, Daryl K HLTH:EX
Sent: Thursday, July 24, 2014 12:56 PM
To: 'Kyong-ae Kim'
Subject: RE: Employed Student Nurses

OK. Yes please use 250 952 2303.

Daryl K. Beckett, JD | Director, Professional Regulation | Health Sector Workforce Division | BC Ministry of Health | 250-952-2303 | [Professional Regulation Home](#)

From: Kyong-ae Kim [<mailto:KKim@crpnbc.ca>]
Sent: Thursday, July 24, 2014 12:46 PM
To: Beckett, Daryl K HLTH:EX
Subject: RE: Employed Student Nurses

How about August 5, 11 am? I will send you an Outlook Invitation if that works for you. I will call you at 250 952 2303, or is there a different number you want me to use?

Kyong-ae Kim, LL.B. (Ms) | Executive Director/Registrar
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From: Beckett, Daryl K HLTH:EX [<mailto:Daryl.Beckett@gov.bc.ca>]
Sent: July-24-14 12:41 PM
To: Kyong-ae Kim
Subject: RE: Employed Student Nurses

OK – I have Aug 5, 6 or 7 avail any time except Thur morning.

Daryl K. Beckett, JD | Director, Professional Regulation | Health Sector Workforce Division | BC Ministry of Health | 250-952-2303 | [Professional Regulation Home](#)

From: Kyong-ae Kim [<mailto:KKim@crpnbc.ca>]
Sent: Thursday, July 24, 2014 12:38 PM

To: Beckett, Daryl K HLTH:EX
Subject: RE: Employed Student Nurses

s.22

but what about the following week?

Kyong-ae Kim, LL.B. (Ms) | Executive Director/Registrar
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From: Beckett, Daryl K HLTH:EX [<mailto:Daryl.Beckett@gov.bc.ca>]
Sent: July-24-14 11:39 AM
To: Kyong-ae Kim
Subject: RE: Employed Student Nurses

Apologies, I thought I had responded to this but can't seem to find a record. I have good avail next week Tues or Wed.

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