The College of Respiratory Therapists of Ontario (CRTO), through its administration of the Regulated Health Professions Act and the Respiratory Therapy Act is dedicated to ensuring that respiratory care services provided to the public by its Members are delivered in a safe and ethical manner. The CRTO has developed this Position Statement, on the issue of Medical Directives and the Ordering of Controlled Acts and believes that the position outlined, and the guidance provided, serve both the interest of the public and the Members of the College, by ensuring that the appropriate health care providers who perform procedures involving controlled acts are authorized to do so in accordance with the legislation/regulations/policies and/or guidelines that govern their practice.
BACKGROUND

Controlled Acts Authorized to RTs

Under section 4 of the Respiratory Therapy Act (RTA), members of the CRTO are authorized to perform five controlled acts:

1. Performing a prescribed procedure below the dermis.
2. Intubation beyond the point in the nasal passages where they normally narrow or beyond the larynx.
3. Suctioning beyond the point in the nasal passages where they normally narrow or beyond the larynx.
4. Administering a substance by injection or inhalation.
5. Administering a prescribed substance by inhalation.

For Respiratory Therapists, procedures 1, 2, and 4 may only be performed upon receipt of a valid order from a member of the College of Physicians and Surgeons of Ontario, the College of Midwives of Ontario, the Royal College of Dental Surgeons of Ontario, or a member of the College of Nurses of Ontario who holds a certificate of registration in the Extended Class (RN[EC]), known as a Nurse Practitioner.

POSITION STATEMENT

1. While it is permissible to delegate the performance of a procedure involving a controlled act to a health care professional (regulated or non-regulated) who is not authorized to perform that controlled act, it is the position of the CRTO that there is no provision in the RHPA to allow a Physician or any other regulated health care professional to “delegate” the ordering of a procedure involving a controlled act to another health care provider.¹

2. A properly constructed medical directive is a medical order for a specified range of patients who meet specific conditions. It is the position of the CRTO that the medical directive is the order, and therefore must meet the criteria for a valid medical order.²

The essential elements of a properly constructed medical directive are:

- The name and description of the procedure, treatment or intervention being ordered;
- Specific patient/client conditions that must be met before the procedure can be implemented;
- Circumstances which must exist before the procedure can be implemented;

¹ See also PPG Delegation of Controlled Acts
² See also PPG Orders for Medical Care
(POSITION STATEMENT CONTINUED)

- Comprehensive list of indications and contraindications to performing the procedure;
- A list of health care professionals who may implement or perform the procedure and any educational requirements required (e.g., only Respiratory Therapists who work in a certain area and have advanced certification or have completed continuing education etc.);
- The Physician(s) or other health care professional authorizing the medical directive; and
- A list of administrative approvals from the facility with dates and signatures.

3. It is the position of the CRTO that it is acceptable for a Respiratory Therapist to perform procedures involving controlled acts in accordance with a medical directive that is communicated by another health care professional provided that the Respiratory Therapist does the following:
   - Ensures that there was Respiratory Therapy input into the development of any medical directives that pertain to procedures performed by Respiratory Therapists.
   - Familiarizes himself/herself with the contents of any medical directives which pertain to procedures being performed by Respiratory Therapists in their specific practice settings including confirming that the individual(s) making the order (i.e., authorizing the medical directives) is/are authorized to do so under the Respiratory Therapy Act (i.e., a Physician, Midwife, Dentist or Nurse Practitioner).
   - Ensures that, prior to performing any procedure ordered through a medical directive, that the medical directive meets the criteria for a properly constructed medical directive.
   - Performs his/her own assessment, comparing the assessment to the detailed criteria in the medical directive and uses his/her own judgment in deciding to implement the medical directive.
   - Ensures that the procedure(s) he/she is about to perform have been specifically identified in the medical directive as procedures to be performed by a Respiratory Therapist.