



College of Respiratory
Therapists of Ontario

Ordre des thérapeutes
respiratoires de l'Ontario

RTs WORKING WITH PAs

Practice FAQs

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QUESTION

We have a Physician's Assistant (PA) working in our Emergency Room. She recently started giving the RTs orders to perform arterial blood gas (ABG) samples on her patients. Can we accept her orders?

ANSWER

Physician's Assistants (PAs) are a non-regulated healthcare provider in Ontario and have no controlled acts authorized to them. Their authority to perform controlled acts comes either through delegation from a regulated healthcare professional (e.g., a physician) or through one of the exceptions in the *Regulated Health Professions Act (RHPA)*¹. In addition, they may also perform procedures that are in the public domain and do not fall under a controlled act as defined by the *RHPA* (e.g., administration or oral medication). There are two important principles to remember:

1. **Sub-delegation is not permitted.** If the PA has been delegated the authority to perform a procedure, they can perform the procedure themselves, but cannot transfer that authority to perform it to someone else.
2. **"Ordering" cannot be delegated.** Only controlled acts can be delegated, and "ordering" is not a controlled act.

In this scenario, the PA likely received delegation to perform an ABG sample from the physician(s) that oversees her practice. This means she can perform the ABG herself or she may **communicate an order for an ABG given by a physician to an RT**, but she cannot "order" an RT to perform the ABG. RTs are already authorized to perform ABG samples, so they don't need to have the authority delegated to them. However, RTs can only accept an order from someone specified under the *Respiratory Therapy Act (RTA)*², such as a physician, dentist, midwife or nurse practitioner.

¹ *Regulated Health Professions Act*. (1991). s. 29(1)

² *Respiratory Therapy Act*. (1991). S.5(1)