

March 4, 2009

The Honourable David Caplan  
Minister of Health and Long-Term Care  
10<sup>th</sup> Floor, Hepburn Block  
80 Grosvenor Street  
Toronto, ON M7A 2C4

Dear Minister,

Re: HPRAC *Critical Links* report

We appreciate the opportunity that was given to the Medical Laboratory Technologist (MLT) profession to participate in the scope of practice review that was recently conducted by the Health Professions Regulatory Advisory Council.

In June 2008, the College of Medical Laboratory Technologists of Ontario (CMLTO), the Ontario Society of Medical Technologists (OSMT), and the Canadian Society for Medical Laboratory Science (CSMLS) made a joint submission to HPRAC to expand the scope of practice for MLTs. Upon release of the *Critical Links* report, we were collectively disappointed to learn that HPRAC did not support any clarification of, or expansion to, the scope of practice of MLTs or to the proposal to amend outdated regulations.

In this respect, the proponents were to prepare a joint response under the leadership of the CMLTO. Unfortunately, the OSMT was not in entire agreement with the approach taken by the CMLTO and we declined to endorse the response. It is with regret that the time constraints made it impossible for the OSMT to author its own response by the February 28<sup>th</sup> deadline but we wish to explain the situation.

With respect to the section entitled "Scope of Practice and Authorized Acts" in the CMLTO/CSMLS response, the OSMT continues to support the case presented. However, the OSMT believes that the research conducted by HPRAC was as thorough as possible considering the breadth of the referrals and the challenging time-lines for all concerned. The rationale for the conclusions reached by HPRAC were adequately justified and we believe we can learn from discussions presented to better prepare the profession for a more favourable position for scope of practice changes in the future. We feel that the CMLTO/CSMLS response is unfair in its criticism of the methodologies and approaches taken by HPRAC in carrying out the work involved in this referral.

Another reason for declining endorsement of the CMLTO/CSMLS response is that it includes misleading indications that all the proponents are in favour of regulating Medical Laboratory Assistants/Technicians (MLA/Ts). As a matter of record, the OSMT does not support regulation for MLA/Ts at this time.

As clarification, the original medical laboratory technology submission to expand the scope of practice for MLTs was made in two parts. Part A requested an expansion of the scope of practice for medical laboratory technology as well as amendments to several pieces of related legislation. This was supported by the OSMT. Part B of the submission included a request to regulate MLA/Ts. Part B was not supported or endorsed by the OSMT. We felt it was inappropriate to use this multifaceted Ministerial referral as a platform to present cases to address this complex issue.

We noted that the CMLTO/CSMLS response includes a statement that reads “...the CMLTO and CSMLS are heartened by HPRAC’s confirmation of and seeming support for the Proponents’ rationale for regulating MLA/Ts.” While we are aware that HPRAC did explore this possibility and concluded that it was not within this Ministerial referral, the only indication that the OSMT has had on HPRAC’s thoughts on regulating MLA/Ts has been that of neutrality. This was indicated to us in the attached letter from Ms. Barbara Sullivan, dated October 17, 2008. On a final note about this matter, the OSMT is concerned that the CMLTO uses many occasions to promote its goal to regulate MLA/Ts under its umbrella and by doing so has, and continues to spend enormous amounts of energy, resources, and funds on this pursuit.

Once again, please accept our apologies that the OSMT was not able to develop a more comprehensive response to the *Critical Links* report. While our resources and the time constraints did not allow us to focus on all of the report’s components, some key issues were addressed by our endorsement of the response submitted by the Coalition of Regulated Health Professions’ Associations of Ontario (CORHPA).

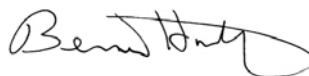
We respect the conclusions reached by HPRAC on the Scope of Practice review and will endeavour to revisit this on another occasion.

Yours sincerely,



Blanca McArthur  
Executive Director

Yours sincerely,



Bernard Hartung, MLT  
President

encl.

cc: Ms. Barbara Sullivan, Chair, Health Professions Regulatory Advisory Council  
Ms. Marilyn Wang, Director, Health Professions Regulatory Policy and Programs, MOHLTC  
Ms. Kathy Wilkie, Registrar, College of Medical Laboratory Technologists of Ontario  
Mr. Kurt Davis, Executive Director, Canadian Society for Medical Laboratory Science