

April 6, 2011

The Honourable Michael de Jong
Minister of Health Services
Government of British Columbia
STN PROV GOVT
Victoria, BC V8W 9E2

Dear Minister De Jong,

Re: *LPN Practice – Immunizations*

We are writing to you as the unions representing Licensed Practical Nurses (LPNs) in various settings in BC. We are advocates for LPNs, and our interest is to move the profession forward.

LPNs are an important part of the health care team, and have been taking on a growing list of responsibilities. LPNs use their knowledge and skills to assess, plan, implement and evaluate care for patients and residents throughout all stages of life, and in a variety of practice settings including hospitals, residential care facilities, public health units, community nursing agencies, private practices, clinics, physicians' offices, industry, schools, adult day-care centres, private homes and community health centres.

We know your government shares the commitment to greater utilization of LPNs in our public health care system. The Ministry of Health Services has spoken to the importance of optimized use of health human resources, which includes training and authorizing health professionals to provide a wider range of services and expand their scope of practice.

In this context, we have concerns about the current lack of progress for the utilization of LPNs in providing immunizations in British Columbia. We were pleased that your predecessor, Health Services Minister Kevin Falcon, amended the licensed practical nurses regulation in November 2010 to permit LPNs to provide immunizations independently, within the appropriate limits.

This kind of independent practice is not new for LPNs in BC. In 2009, in response to the H1N1 crisis, the Ministry permitted LPNs to provide immunizations independently by way of a Memorandum of Agreement. Since that time, LPNs were effectively and safely utilized in providing immunizations in the BC public health system.

LPNs are trained for this role. The BC Centre for Disease Control provides the educational foundation for this LPN practice. They offer a course which leads to immunization certification.

You will also be aware that LPNs are used effectively and safely to provide immunizations independently in other jurisdictions such as Ontario, Alberta, Manitoba, and Saskatchewan. Generally an authorized practitioner must be available for consultation, but the LPN is permitted to practice independently in these jurisdictions.

Our unions support the practice, the 2009 memorandum, and Minister Falcon's amendment of November 2010.

Several months have passed since Minister Falcon's amendment, and yet the progress that the amendment was intended to achieve has been frustrated. New doors should be opening for LPNs to take on a greater role providing immunizations in BC. Instead, employers have faced a significant roadblock in their efforts to utilize LPNs independently for immunizations.

The roadblock comes because the Ministry and the College of LPNs of BC have been unable to agree to the Standards, Limits, and Conditions (SLCs) which would give shape to Minister Falcon's amendment. Without established SLCs, the regulation has no force.

Presently, the SLCs are only established for a few very specific shots – flu and pneumonia. There are no SLCs in place, for example, for the entire school-based system of immunizations. Many other types of immunizations that could otherwise be supported by the amended regulation also have no SLCs in place.

This is having real consequences for health care employers. In effect, the utilization of LPNs has taken a step backwards—which was not the intention of Minister Falcon's regulation amendment. As an example, the Fraser Health Authority used to use LPNs in providing immunizations in public health programs and was seen as a leader in LPN utilization. The Fraser Health Authority has now been effectively forced to remove LPNs from their immunization roles in the public health programs because the SLCs are not developed.

The under-implementation of Minister Falcon's amendment is a missed opportunity for our public health system, is having a negative effect on employers, and is a move backwards for LPNs.

Our unions are proud to support LPNs in the work they do to keep British Columbians safe and healthy. We continue to support expanded roles for LPNs, as well as increased independence of practice for LPNs, where safe and appropriate. We encourage your Ministry to work with the College of LPNs to get the Standards, Limits and Conditions in place.

Signed,



Darryl Walker
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