

# Unregistered Practice in Ontario

## Guidance Document

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The purpose of this guidance document is to provide Manitoba's licensed practical nurses (LPNs) with information about the CLPNM's expectations when they practise in the jurisdiction of Ontario.

### Introduction

The College of Licensed Practical Nurses of Manitoba (CLPNM) is advising our registrants, who wish to also practise in Ontario, to continue obtaining a second registration with the College of Nurses of Ontario (CNO) before practising as a practical nurse in that province.

We are advising this despite the passage of Ontario legislation that no longer makes immediate Ontario registration a legal requirement for an LPN who holds registration in another Canadian jurisdiction and who wishes to practise in Ontario.

The CLPNM takes the position that professional registration, with a body that has jurisdiction in the location of practice, is essential for effective regulation and public protection. The CLPNM is issuing this guidance to our registrants out of concern for our organization, our registrants, and the public.

### Background

The Government of Ontario has passed legislation to permit some health care professionals, registered in good standing in other Canadian or American jurisdictions, to temporarily practise in the Province of Ontario without holding a valid Ontario registration.<sup>1</sup> This includes licensed practical nurses registered by the CLPNM in Manitoba.

### Issue

The CLPNM supports the goal of advancing labour mobility across Canada; however, as the professional regulator for LPNs in Manitoba, we have concerns about the implications of this legislation.

- The CLPNM is unclear whether the Government of Ontario intends for health care workers to be unregulated when practising in the Province of Ontario, which presents significant safety risks to the public, or whether it intends that the regulatory bodies in other jurisdictions, including the CLPNM, will assume responsibility of regulating health care professionals in Ontario. The CLPNM was not consulted, yet as a regulator in a bordering province, the CLPNM stands to experience significant impacts from this legislation.
- The CLPNM has neither the mandate nor the resources to regulate across provincial boundaries. As an organization, we do not have the same liability protection in the jurisdiction of Ontario that is afforded to us by our legislation in Manitoba.
- In addition, we have not charged our registrants the fees that would be required for us to manage this broader regulatory scope and greater organizational liability. As a non-profit organization, we have limited resources and receive no funding from external bodies.

We rely on application and registrant fees to cover our costs. We cannot take on a broader mandate without corresponding additional revenue, and do not wish to pass the required costs of this broader mandate on to all Manitoba LPNs.

- Any Manitoba LPN, who chooses to practise in Ontario without Ontario-specific registration, may expose themselves to increased liability risk. The liability protection that Manitoba LPNs hold, as a requirement for their Manitoba registration, does not cover unregistered practice in Ontario. Without Ontario registration and corresponding liability protection, LPNs may open themselves up to personal financial risk.

Obtaining a second registration with CNO in Ontario is quick, particularly when an applicant already holds registration elsewhere in Canada. CNO advises that this process can take place in the matter of a few days.<sup>2</sup> At the time of writing, CNO advises that applicants who hold registration in another Canadian jurisdiction benefit from a 25% rebate on their annual CNO membership fee.<sup>3</sup> The relative ease of obtaining CNO registration means that practising without it may carry greater risk than benefit.

### Position Statement

Given the jurisdictional, cost, liability and public protection concerns outlined above, the CLPNM is advising its registrants that registration through the CLPNM alone does not authorize them to practise in Ontario.

CLPNM registrants who wish to also practise in Ontario are advised to obtain a second registration from CNO, even if practising in Ontario without CNO registration is permitted by the Government of Ontario.

The CLPNM takes the position that the cost of regulating the practice of practical nursing in Ontario should be borne by those who wish to engage in practice in that jurisdiction.

CNO is best able to regulate practical nursing in Ontario, given its legislative authorities and jurisdiction in that province.

### Conclusion

The CLPNM supports a system for multijurisdictional registration and is actively working with our regulatory counterparts across Canada to implement one. Such a system will enable expedited labour mobility across the country, while ensuring that there continues to be effective professional oversight for the benefit of the public wherever the LPN chooses to practise.

### For More Information

Visit our website at [www.clpnm.ca](http://www.clpnm.ca) for more information and resources.

Contact us with questions at  
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### About the CLPNM

The CLPNM is the governing body for the licensed practical nursing profession in Manitoba. Mandated to govern its members in a manner that serves and protects the public interest, the CLPNM establishes practice requirements for the provision of safe and effective nursing care.

## References

1. Government of Ontario. (2025, June 29). *"As of Right" Guidance Document*. <https://www.ontario.ca/files/2025-07/moh-as-of-right-guidance-document-en-2025-07-29.pdf>
2. College of Nurses of Ontario. (2023, July 24). *Government regulation on interjurisdictional mobility takes effect*. CNO Website. <https://www.cno.org/en/news/2023/july-2023/government-regulation-on-interjurisdictional-mobility-takes-effect/>
3. College of Nurses of Ontario. (Undated). *Application & Membership Fees*. CNO Website. <https://www.cno.org/en/become-a-nurse/application-membership-fees/>