College of Medical Laboratory Technologists of Ontario

Practice guidelines

Guidelines for evaluating professional practice activities

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Introduction

Medical laboratory science is a dynamic field that must continuously adapt to meet growing demands. Everyone working in the medical laboratory sciences sector, including Medical Laboratory Technologists (MLTs), and medical laboratory assistants/technicians, have a shared responsibility to provide the public with safe, accurate, and reliable laboratory services. Medical laboratory practitioners are frequently asked to perform new activities, tasks, or duties while providing services to patients and clients.

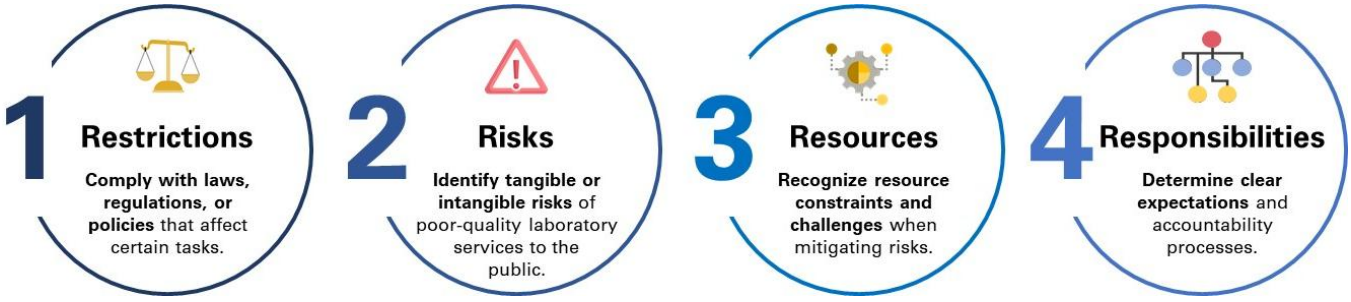
MLTs and medical laboratory assistants/technicians are often asked to transfer or take on different responsibilities. Based on CMLTO Skill mix survey data, MLTs are most likely to take on "supervisory" tasks (i.e., document review, supervising other staff members) while transferring pre-analytical and analytical responsibilities to medical laboratory assistants/technicians.[1] MLT and medical laboratory assistant/technician skill mix is often used to mitigate issues such as staffing and budget limitations.[1] Due to the increased use of skill mix in the laboratory sector, it may be useful in some situations to better understand these two unique positions and their accountabilities. A thorough breakdown of these two positions can be found in Appendix A.

With the acquisition or transfer of activities, laboratory practitioners may often ask themselves:

"Can I or am I allowed to do this activity?"

To help answer this complicated question, CMLTO has developed a 4-step framework which breaks down complex concepts into actionable processes. The framework supports stakeholders in planning for and making confident decisions. This guideline prompts stakeholders to ask important questions when considering if they or someone for whom they are responsible, should perform certain activities or duties. Stakeholders are provided additional information and considerations when reflecting on their answers in each step.

Evaluating professional practice activities framework



This framework may be applied to various positions and practice settings. However, it is important to note this framework does not cover all possible scenarios, duties, tasks, or activities. The framework is intended to support individuals in making informed decisions while allowing them to exercise their own professional judgment.

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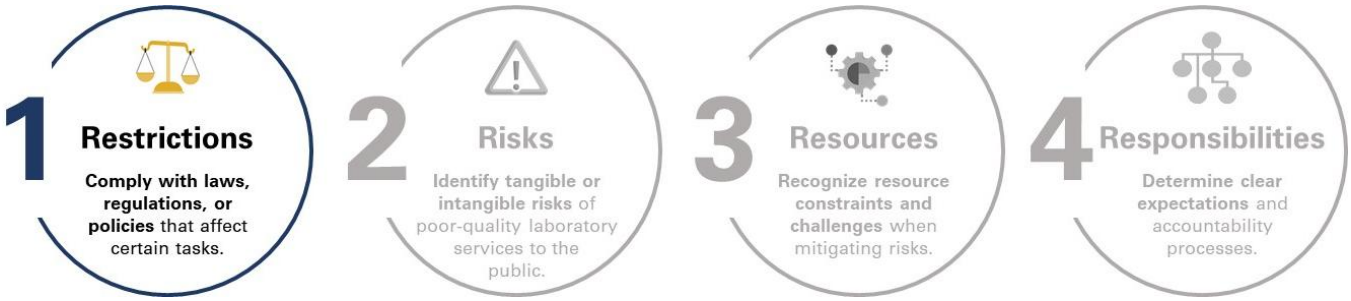

Restrictions:

Questions to ask:

1. Is the activity described in legislation (e.g., *Regulated Health Professions Act, 1991* (RHPA)*, Occupational Health and Safety Act, 1990, Public Hospitals Act, 1990, etc.)*?
2. Is the activity a controlled act listed in the RHPA (Section 27)?
3. Are there existing organizational policies or processes (e.g., Standard Operating Procedures [SOPs]) that describe who should/must perform this activity?

If you answered YES to any of these questions, follow the legislative, policy, or SOP directions and advice.

Important considerations: Controlled acts can be delegated to both regulated and unregulated healthcare providers if proper delegation processes have occurred. Laboratory testing is not a controlled act under the RHPA. If a person has the knowledge, skill, or judgment to safely perform a task, it can be done by a regulated or unregulated healthcare practitioner. However, there is a general harm clause in the RHPA (Section 30 (1)), that encompasses the provision of healthcare:

"No person, other than a member treating or advising within the scope of practice of his or her profession, shall treat or advise a person with respect to his or her health in circumstances in which it is reasonably foreseeable that serious physical harm may result from the treatment or advice or from an omission from them." [2]

This clause applies to those aspects of treatment and care that may not be otherwise covered by the controlled acts. For example, even though performing laboratory tests on human specimens is not one of the controlled acts listed in the RHPA, it is reasonably foreseeable that serious physical harm could result if this were done by someone who did not have the knowledge, skill, or judgment to do so.

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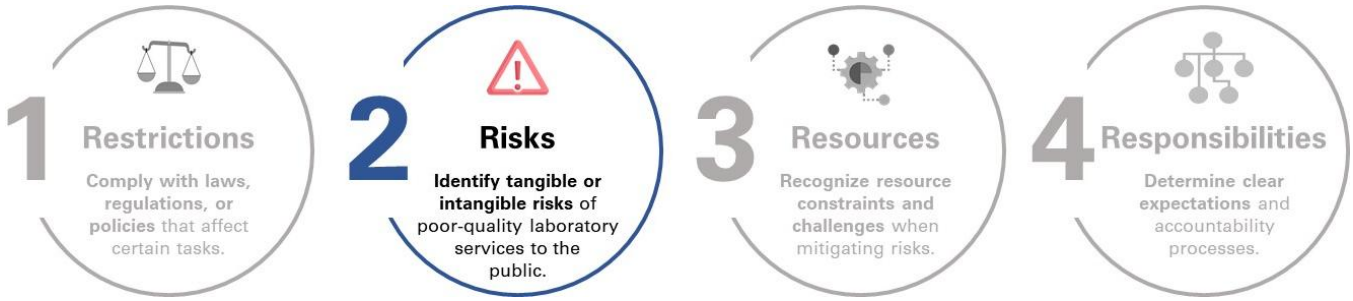

Risks:

Questions to ask:

1. Do I clearly understand the risks involved with this activity?
2. Do I understand the potential quality or safety issues if this activity is performed by one individual instead of another?
3. Do I have a plan if a risk(s) happens?
4. Do I know if this activity is covered by professional liability insurance? [4]
5. Am I aware of union or other department requirements and considerations related to this activity?

If you answered NO to any of these questions, review the required activity and its processes to better understand the potential risks.

Important considerations: The goal of all laboratory practitioners—regulated and unregulated alike—is to provide high-quality, reliable, and accurate laboratory services to Ontarians. Risks are a fundamental component of healthcare, and they must be considered, in full, by all stakeholders.[5] An important element of understanding if an individual can or cannot complete an activity, is to fully understand the repercussions if it is not performed to a required standard.

Risks can be tangible (e.g., patient harm) or intangible (e.g., risks to reputation). Risks can be identified before, during, or after an activity is performed. When a risk is identified it should be thoroughly investigated, analyzed, and recorded. After fully understanding a risk, an individual must develop a risk mitigation strategy to reduce the chance of the event happening or to lessen its impact if it does happen. If risks are not fully understood there is potential to jeopardize patient or staff safety.[6,7]

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Resources:

Questions to ask:

1. Do I have the resources (e.g., time, personnel, technology, budget) to mitigate risks?
2. Do I understand the resource implications for each risk mitigation strategy?
3. Do I know if a specific practitioner has the prerequisite knowledge, skills, or judgment to perform this activity safely and competently?
4. Am I aware if this activity aligns to a practitioner's competency profile? [3,]
5. Do I know which practitioner would be best equipped to perform this activity now and in the future?

If you answered NO to any of these questions, consider engaging other stakeholders to identify current and future needs of your organization.

Important considerations: It is important to consider that every practice setting is unique, each with its own specific challenges. Resource constraints could include factors like available personnel, budget, and time which all affect who can perform which activities. Each constraint carries its own distinct risks. It is critical that everyone understands the risks associated with the relevant activity and their impact on cost, time, and quality of services or care.

Please note that it is not within the CMLTO's mandate to comment on employer-related issues including health human resources planning. This may include the use of MLTs or medical laboratory assistants/technicians for certain activities or responsibilities. MLTs and medical laboratory assistants/technicians often work side by side in a collaborative environment to provide effective and efficient patient care. The use of MLTs' and medical laboratory assistants/technicians' skills can be leveraged variously to meet each organization's demands. It is the employer's and practitioner's responsibilities to understand and address the challenges they are facing.

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Responsibilities:

Questions to ask:

1. Do I know who this practitioner is accountable to?
2. Do I understand my own accountability obligations within my organization?
3. Have the activity's expected outcomes been clearly communicated to all stakeholders?
4. Am I and others aware of the consequences and next steps to take in the event of an error or adverse outcome?
5. Am I confident the individual performing this activity fully understands the accountability structure and processes including their role within it?

If you answered NO to any of these questions, review all applicable resources to better understand who is responsible to whom and for what tasks.

Important considerations: Understanding responsibilities and accountabilities means identifying to whom you are responsible and who is responsible to you for a particular activity. That may include individuals inside or outside of your organization.[8] A few examples of responsibilities that may be linked to a particular activity could include:

- meeting financial or budgetary obligations
- ensuring patient/client turnaround times are met
- reporting requirements to a supervisor
- gathering data produced by other MLTs.

Accountable parties may include others in your organization, regulatory bodies, public health agencies, patient groups, other laboratories, etc.[8] By understanding an activity thoroughly, it will enable you to identify all stakeholders to whom you are accountable and who is accountable to you. Stakeholders could use process mapping, a Responsible/Accountable/Consulted/Informed (RACI) chart or matrix, organizational charts, etc., to better understand an activity and its applicable accountabilities. Challenges occur when there is no clear understanding of the activity's goal, what determines an activity's success, and the consequences if the activity is not performed adequately. [9]

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Conclusion

The medical laboratory sector is constantly evolving, which can cause uncertainty about which individuals can perform which specific activities or duties. Ongoing collaboration between practitioners is an important component of the medical laboratory sciences field. Although there are distinctions amongst practitioners, the use of MLT and medical laboratory technician/assistant skill mix can assist organizations to continuously meet the needs of Ontarians.

This guideline and its framework use a series of key steps and questions to support stakeholders in answering: "can I or am I allowed to do this activity?" The framework is intended to support individuals in making informed decisions while allowing them to exercise their own professional judgment.

If you have any questions about this document, or about an MLT's professional, legal, or ethical obligations, please contact the CMLTO by email at registrantrelations@cmlto.com.

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Medical Laboratory Technologist or assistant/technician: What's the difference?

Medical Laboratory Technologists and medical laboratory assistants/technicians work closely together to provide quality laboratory services to the public. At times, these job titles are referred to incorrectly. You may use the information below to better understand these healthcare practitioners' responsibilities.

Medical Laboratory Technologist		Medical laboratory assistant/technician
Self-regulated accountable to the public, College, their employer, and themselves in accordance with CMLTO's Code of Ethics **Mandatory** registration to practise in Ontario with standardized entry-to-practice requirements and a public register	**Regulation**	**Unregulated* accountable to patients/clients based on employer requirements** Unregulated means no College oversight. However, CMLTO has a **Voluntary Roster (VR)** with standardized affiliate requirements and a public register
Per the *Medical Laboratory Technology Act, 1991:* "…a member is **authorized, subject to the terms, conditions and limitations imposed on his or her certificate of registration, to take blood samples from veins or by skin pricking."** [1]	**Controlled Acts**	Per the *Laboratory and Specimen Collection Centre Licensing Act, 1990,* an individual can collect samples if a legally qualified medical practitioner certifies "…the person has, **competence in the techniques of taking and collecting specimens** from the human body, the ability to **manage and care for patients**, and a high standard of **personal cleanliness."** [2]
Legislated Scope of Practice (MLT Act): "The practice of medical laboratory technology is the performance of laboratory investigations on the human body or on specimens taken from the human body and the evaluation of the technical sufficiency of the investigations and their results." [1]	**Scope of Practice**	**Draft Scope of Practice (*applicable to VR registrants*):** "In the practice of Medical Laboratory Technology, registered medical laboratory technicians collect, process, and evaluate the adequacy of specimens taken on and from the human body and perform non-complex processes for the purpose of laboratory investigations." [4]
A "laboratory technologist" means a person who under **general supervision** performs tests which require the **exercise of independent judgment** [5] **Pre-analytical, analytical, post-analytical** [3]	**Position & Responsibilities**	A "laboratory technician" means a person who **under direct supervision** performs laboratory tests which require **limited technical skill and responsibilities** [5] **Often pre-analytical (i.e., specimen collection), analytical**

** Unregulated as of 2021, CMLTO is actively pursuing the regulation of medical laboratory assistants/technicians*

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References:
1. *Medical Laboratory Technology Act, 1991*
2. Regulation 683: Specimen Collection Centres under the *Laboratory and Specimen Collection Centre Licensing Act, 1990*
3. CMLTO Skill Mix Surveys (2016 & 2020)
4. CMLTO Registered Medical Laboratory Technician Draft Scope of Practice Statement (January 2011)
5. Regulation 682: Laboratories under the *Laboratory and Specimen Collection Centre Licensing Act, 1990*

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