

Working in Multiple Regulated and Unregulated Healthcare Roles

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INTRODUCTION

The College of Licensed Practical Nurses and Health Care Aides of Alberta (CLHA) has the authority under the *Health Professions Act* (HPA) to carry out its activities and govern Licensed Practical Nurses (LPNs)* in a manner that protects and serves the public interest.

This info sheet provides information for LPNs who, in addition to their roles as LPNs, work in other roles either as regulated professionals or unregulated health providers. It outlines their responsibilities as an LPN, as well as other key considerations. For questions about other professions, please contact the relevant regulatory body directly.

Please note that the expectations and guidance in this info sheet may not apply to LPNs working in certain roles.

MULTIPLE PROFESSIONAL REGISTRATIONS

LPNs are regulated health professionals under the HPA and are held accountable to their standards of practice and code of ethics.

Regulated health professionals who hold two or more practice permits to practice in different regulated professions are considered to have multiple professional registrations. For example, someone may hold an LPN practice permit and a Registered Nurse (RN) practice permit at the same time. Professionals with multiple professional registrations must meet the requirements of each regulatory body to ensure public safety and maintain professional standards.

An LPN with multiple professional registrations can only perform the duties within the scope of practice for the profession and those specified in their job description when working during a scheduled shift. However, in emergency situations, an LPN with multiple registrations may practice to their most applicable scope of practice if there is no other suitable health professional to respond. For example, an LPN who is also a registered social worker is visiting a client on a social worker scheduled shift when the client's condition deteriorates unexpectedly. In this scenario, they may respond as an LPN if the emergency requires them to provide nursing services within the LPN scope of practice while following any relevant employer requirements until another authorized health professional is available to take over the client's care. The LPN must then

* In this document, "LPN(s)" has the same meaning as "regulated member(s)" in the *Health Professions Act*.

document the events and how they responded in an accurate and timely manner. This way, the LPN ensures the client's protection and safety in an emergency situation.

Key Considerations

An LPN with multiple registrations is required to:

- meet the registration requirements for each regulatory body;
- comply with the legislative, regulatory, and employer requirements;
- practice under one profession/designation per scheduled shift, except in emergencies where no other appropriate health professionals are available to respond;
- inform their clients, colleagues, and employers about the role they are working in, including using the appropriate title applicable to that role; and
- ensure the client's health record reflects the role under which the professional services were provided.

Registration Requirements

It is important to be familiar with the distinct registration requirements for each practice permit that the health professional holds. This includes requirements for both new registrations and renewals. The CLHA registration requirements apply to all applicants regardless of whether they are also registered under another profession. This also applies to other requirements, such as the Continuing Competency Program (CCP), liability insurance, good character, and other requirements.

Liability Coverage

To register as an LPN in Alberta, the LPN is required to obtain professional liability insurance that meets the minimum requirements established by *CLHA Bylaws*. When holding multiple practice permits, the LPN must provide the CLHA with evidence of professional liability insurance that covers LPN practice to ensure the LPN is covered while working within their scope of practice. Typically, the LPN insurance policy only provides coverage when working within the scope of practice of an LPN and will not apply when working in a different capacity. LPNs are responsible for ensuring they have the appropriate liability insurance for all their professional roles.

For more information, please refer to the *Actively Engaged Requirements for Registration* and the *Declarations and Registration Requirements* policies or contact the Registration Department.

Conduct Complaints

If a complaint is filed against the LPN with multiple professional registrations, the LPN has a duty to report the complaint to all regulatory bodies with which they are registered.

- If the complaint relates to the provision of practical nursing services, it will be handled by the CLHA. In this case, the LPN will be held to the level of accountability, skill, and education of the LPN profession.
- If the LPN was acting in a different capacity when the incident occurred, the CLHA still has jurisdiction with respect to the LPN's conduct; however, the initial investigation may be conducted by the other regulatory body with which they are registered, and the CLHA will in many cases determine what steps to take under its own process after those proceedings have been concluded.
- If another regulatory college handles the complaint, the LPN must still report the status of those proceedings and the outcome to the CLHA.

For more information, please contact the Conduct Department at complaints@clha.com.

Accountability

LPNs are responsible and accountable for their practice and conduct under all the regulatory bodies they are registered with, regardless of their role. LPNs are, therefore, expected to comply with the legislative, regulatory, and employer requirements related to all practice permits they hold. For example, an LPN who is working in an LPN role (but who is also registered as an RN) will require supervision for any activity that LPNs require supervision to perform, even if they are authorized and competent as an RN to perform the activity without supervision.

As responsible and accountable professionals, LPNs must understand how meeting the requirements of multiple professional registrations impacts their workload, fitness to practice, and relationships with clients and colleagues and take steps to address these issues.

Role Confusion

Role confusion may also occur due to holding multiple roles within one facility, which can negatively impact client care and relationships with colleagues. When LPNs work in multiple roles, it might be difficult for clients or staff to know what role they are working in at any given time. Clients might not understand why the nurse can offer a certain professional service sometimes but not at other times.

LPNs should ensure that clients and colleagues understand their roles and responsibilities each shift by communicating their current role, using the appropriate title, documenting correctly, and following any relevant employer requirements. This helps reduce confusion about which duties they can and cannot perform under that given role. LPNs should also clarify their roles and responsibilities with their employer or potential employers and be aware of any potential conflict of interest that may arise from working under multiple designations.

WORKING AS A REGULATED HEALTH PROFESSIONAL AND AN UNREGULATED HEALTH PROVIDER

An LPN who is registered with the CLHA and also works as an unregulated health provider may only perform the duties outlined in their scope of practice and/or job description for the scheduled shift. In such cases, the LPN must be aware of their obligations and accountabilities and follow employer requirements to ensure that they practice safely, competently, and ethically. For example, if an LPN is working as a comfort care aide (CCA), they are not allowed to perform an intravenous (IV) start on a CCA scheduled shift if that activity is outside the role of the CCA, even if they are qualified to do so as an LPN.

However, in emergency situations where an LPN is working as an unregulated health provider, and no other qualified, regulated member is available to assist urgently, the LPN is expected to provide appropriate care using their nursing knowledge, skill, and judgment until another regulated health professional can take over. Additionally, the LPN should report relevant information to the most responsible healthcare provider according to employer requirements.

Key Considerations

The following are key considerations for an LPNs who is also working as an unregulated health provider:

- The LPN, regardless of the role in which they are working, remains responsible and accountable for their practice and conduct. This means they must comply with legislative, regulatory, and employer requirements.
- The LPN must meet the registration requirements to maintain their LPN practice permit. The hours worked as an unregulated health provider do not count towards their practice hours as an LPN.
- The liability coverage that an LPN is required to have does not cover them when working in an unregulated role unless they are performing duties that are within the LPN scope of practice.
- The LPN works under one role at a time and within the activities permitted by the job description and/or scope of practice per scheduled shift except in emergencies where no other appropriate health professionals are available to respond.
- The LPN should clearly specify their role if they work in multiple roles at the same facility. This includes using the correct title for each role, informing clients and colleagues as necessary, and maintaining proper documentation.

Document according to the expectations of the role and any employer requirements. Please refer to the *Documentation* policy for more information.

Please note that a complaint can be made to the CLHA against an LPN, even though they were working as an unregulated health provider when the incident occurred. Whether the complaint will be looked into or dismissed is determined on a case-by-case basis. If the CLHA looks into the complaint, the LPN's training, skill, and judgement as an LPN may be considered, even though the incident occurred while working as an unregulated health provider.

CONCLUSION

While LPNs may work in multiple roles, they need to be aware of regulatory requirements and key considerations. LPNs working in multiple roles should always work within the scope of practice or job description of their scheduled shifts. LPNs may provide care to the most applicable scope of practice during emergencies, as their primary responsibility is to provide safe, competent, and ethical care to the public.

Documents are updated frequently. For the most current version and access to related documents and resources, please visit the Knowledge Hub on clha.com.

If after reading this document you have questions, please contact the CLHA's Professional Practice Team via practice@clha.com or 780-484-8886 or 1-800-661-5877 (toll free in Alberta).