

# Fair Registration Practices Report

## Registered Psychotherapists (2018)

The answers seen below were submitted to the OFC by the regulated professions.

This Fair Registration Practices Report was produced as required by:

- the Fair Access to Regulated Professions and Compulsory Trades Act (FARPACTA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPACTA
- the Health Professions Procedural Code set out in Schedule 2 of the Regulated Health Professions Act (RHPA) s. 22.7 (1) and 22.9(1), for health colleges.

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## 1. Qualitative Information

### a) Requirements for registration, including acceptable alternatives

#### i. Describe any improvements / changes implemented in the last year.

1. CRPO developed and implemented an Indigenous Pathway to registration, intended for Indigenous practitioners providing psychotherapy to Indigenous communities. In 2018, one applicant has requested to apply through the Indigenous Pathway application.
2. The Transitional Council had set in policy that the minimum registration requirements for the regular route include 125 direct client contact hours and 30 clinical supervision hours. This clinical experience requirement was posted on CRPO's website. The requirement was not in the Registration Regulation, so staff did not enforce the requirement. In 2018, this was brought to the attention of the Registration Committee. To ensure clarity for applicants, the minimum requirement of 125 direct client contact hours and 30 clinical supervision hours has been removed from CRPO's website.
3. CRPO engaged in numerous opportunities to communicate with stakeholders, including applicants, education program contacts and employers, about the upcoming impacts of the controlled act of psychotherapy, which comes into force January 1, 2020. In particular, this communication dealt specifically with issues related to supervision received by individuals fulfilling the requirements to become a member of CRPO.
4. As of January 2017, there were changes made to the *Private Career Colleges Act, 2005* that saw the loss of an exemption from government registration under which private colleges offering psychotherapy operated to date. CRPO worked with the Ministry of Training, Colleges and Universities to understand the impact on applicants and to contribute to ensuring that regulatory requirements were considered in the registration process.

#### ii. Describe the impact of the improvements / changes on applicants.

1. The Indigenous Pathway application was developed to take into account cultural context, traditional concepts of dealing/wellness and Indigenous training practices.
2. Applicants are better informed of what the minimum requirements are for registered through the regular route.
3. Applicants, clinical supervisors and education programs are able to prepare and make necessary changes in advance of the controlled act of psychotherapy coming into force to ensure they are not in breach of the legislation.
4. Private colleges operating in Ontario that provide students with the skills and knowledge necessary to obtain employment must register with and have their programs approved through the Ministry of Advanced Education and Skills Development by the Superintendent of Private Career Colleges as a

private career college (PCC). This impacts private training programs in psychotherapy that have been recognized, or intend to apply for recognition, through CRPO's review and recognition process.

**iii. Describe the impact of the improvements / changes on your organization.**

1. CRPO has taken steps to ensure the Registration Committee includes a traditionally trained Indigenous practitioner should an application submitted through the Indigenous Pathway be referred to a panel of the Registration Committee for review.
2. No impact on staff.
3. Staff has spent time reaching out to stakeholders through electronic communication and in person presentations to explain the upcoming changes and answer questions. Engaging with stakeholders helped to shape the information that the College prepared for applicants and members.
4. Part of the PCC application process requires assessment of the program by a subject matter expert (SME) and adult education expert (AE). Much of what is evaluated in these assessments is already reviewed in CRPO's recognition process. CRPO contracted with an adult education consultant to conduct a review of the program recognition process to determine whether it meets the Ministry's requirements for completing these assessments. The report prepared by the consultant found that CRPO's recognition process substantially aligns with the Ministry's assessments. Some additional documentation will be gathered from the programs to ensure that all areas of assessment are covered. Based on the report, the Ministry agreed to accept CRPO's recognition as satisfying the SME/AE requirements.

**b) Assessment of qualifications**

**i. Describe any improvements / changes implemented in the last year.**

No changes this year

**ii. Describe the impact of the improvements / changes on applicants.**

No changes this year

**iii. Describe the impact of the improvements / changes on your organization.**

No changes this year

**c) Provision of timely decisions, responses, and reasons**

**i. Describe any improvements / changes implemented in the last year.**

CRPO hired one main decision and reason writer.

**ii. Describe the impact of the improvements / changes on applicants.**

Having one decision and reason writer allows for all decisions to be consistent.

**iii. Describe the impact of the improvements / changes on your organization.**

The decision and reason writer reduced the queue following panel review and contributed to the provision of timely decisions.

**d) Fees**

**i. Describe any improvements / changes implemented in the last year.**

The following fee changes were made in 2018 (note: HST applies to all fees).

1. The fee for creating an online account and taking the required Professional Practice and Jurisprudence e-Learning (JRP) Module changed from \$60.00 to \$145.00.
2. The application fee changed from \$125.00 to \$160.00.
3. The registration fee and annual renewal fee for RP and RP (Temporary) changed from \$550.00 to \$589.00.
4. The registration fee and annual renewal fee for RP (Inactive) changed from \$275.00 to \$295.00.
5. The registration fee and annual renewal fee for RP (Qualifying) changed from \$300.00 to \$321.00.
6. The penalty fee for a late renewal changed from \$75.00 to \$150.00.
7. The fee for each and every subsequent letter reminding a member of an obligation that has not been performed changed from \$50.00 to \$54.00.
8. The fee for a member applying to lift a suspension or reinstating a revoked certificate changed from \$150.00 to \$350.00.
9. The fee to transfer from the Qualifying or Inactive categories to RP changed from \$78.00 to \$80.00.
10. The fee for requiring a recount in an election changed from \$200.00 to \$214.00.
11. The fee for reviewing an applicant's education and training from an unrecognized program was implemented at \$100.00.

Fees #1-10 were pre-existing but increased in 2018. Fee #11 is a new fee.

## ii. Describe the impact of the improvements / changes on applicants.

The increase or implementation of fees impacts applicants/members financially, where applicable.

Some of the fees were increased to transfer cost recovery directly to an impacted member/applicant versus having the cost spread across membership (e.g., cost for penalty fees and reminder letters that are only applicable to members who are not in compliance).

Members have a stronger incentive to comply with responsibilities of self-regulating according to established timelines and deadlines.

## iii. Describe the impact of the improvements / changes on your organization.

Fees changes were, in part, based on inflation, aligning with other regulatory bodies with similar membership and longer history, and cost recovery related to undertaking work (e.g., JRP module maintenance, non-recognized education evaluation). Additionally, the fee increases ensure that CRPO has enough reserves to fulfil its regulatory mandate.

## e) Timelines

### i. Describe any improvements / changes implemented in the last year.

To ensure that complete applications are being reviewed in a timely and efficient manner, CRPO now checks to ensure that required documentation (e.g. transcripts) are received before the application is assigned to a reviewer. Applications where the transcript has not been received upon submission are flagged before being assigned to a reviewer.

### ii. Describe the impact of the improvements / changes on applicants.

Ensuring that applications are complete prior to being assigned to staff decreases the queue of applications waiting for review.

### iii. Describe the impact of the improvements / changes on your organization.

Delays impacting applicants who submitted complete applications have been reduced.

## f) Policies, procedures and/or processes, including by-laws

### i. Describe any improvements / changes implemented in the last year.

1. A Registration Committee Procedures Manual was created, which put into writing many of the procedures already followed by the Registration Committee.
2. Before or after a Qualifying member has passed the Registration Examination and accumulated the minimum hours to transfer to the full RP category, Qualifying members can make a request for direct client contact and/or clinical supervision hours not accepted by staff to be reviewed by a panel of the Registration Committee. The same process regarding notice, submissions, written decision and reasons, and information about appealing to the Health Professions Appeal and Review Board, etc. is followed.

**ii. Describe the impact of the improvements / changes on applicants.**

1. Improved consistency, continuity and fairness.
2. Qualifying members will know as soon as possible whether they will need to gain clinical experience in a different position.

**iii. Describe the impact of the improvements / changes on your organization.**

1. Improved consistency, continuity and fairness.
2. Additional staff and Registration Committee resources are required to facilitate panel deliberations for these referrals.

**g) Resources for applicants**

**i. Describe any improvements / changes implemented in the last year.**

1. Addition of Controlled Act documents, a Self-Assessment Tool for Unregulated Practitioners and information on the Competency Mapping Tool to the CRPO website.
2. Re-formatting the information available for prospective applications on CRPO's website.

**ii. Describe the impact of the improvements / changes on applicants.**

1. The Controlled Act Task Group Documents provide prospective applicants and current members with information on the controlled act of psychotherapy, with a focus on the impact the proclamation of the act will have on practice and the position CRPO has taken regarding how the controlled act and the broader scope of psychotherapy practice intersect. The Self-Assessment Tool allows prospective applicants to determine whether they need to/should consider applying to CRPO or another regulatory college, or whether they need to restrict their practice. Information regarding the Competency Mapping Tool provides prospective applicants who have completed a non-recognized education and training program with more information about the Competency Mapping Tool, which they are required to fill out as part of their application process.
2. Provides prospective applicants with a clearer understanding of the application requirements and steps to registration in an easy-to-navigate format.

**iii. Describe the impact of the improvements / changes on your organization.**

Staff can direct prospective applicants and current members to the resources available on the website as helpful tools in response to their inquiries. By having this information available online, CRPO staff are able to more efficiently respond to inquiries and refer prospective applicants to these resources to reduce further inquiries. By reducing the number of inquiries received, staff can dedicate more time and resources towards application processing and membership services.

**h) Review or appeal processes**

**i. Describe any improvements / changes implemented in the last year.**

No changes this year

**ii. Describe the impact of the improvements / changes on applicants.**

No changes this year

**iii. Describe the impact of the improvements / changes on your organization.**

No changes this year

**i) Access to applicant records****i. Describe any improvements / changes implemented in the last year.**

No changes this year

**ii. Describe the impact of the improvements / changes on applicants.**

No changes this year

**iii. Describe the impact of the improvements / changes on your organization.**

No changes this year

**j) Training and resources for registration staff, Council, and committee members****i. Describe any improvements / changes implemented in the last year.**

In 2018, registration staff and committee members attended the following training sessions:

1. Managing Cultural Differences Workshop, Ontario Regulators for Access Consortium (ORAC) - attended by five registration staff members.
2. The Art of Writing Reasons, Richard Steinecke – attended by 12 staff members from various departments, including registration.
3. Education Session with Erica Richler – attended by registration committee members.
4. World Education Services Credential Labs – attended by two registration staff.

**ii. Describe the impact of the improvements / changes on applicants.**

1. Through the Managing Cultural Differences Workshop, registration staff members are able to better support open, transparent and fair registration practices for all applicants.
2. Staff developed an understanding of the key components in a decision and best practices for drafting decisions. Applicants are positively impacted because the decision and reason document they receive will be drafted by keeping these points in mind, helping applicants understand the reasons for the panel's decision.
3. The education session provided committee members with information on best practices. Registration Committee members are able to ensure fair registration decisions for all applicants.
4. Registration staff members are able to ensure open, transparent and fair registration practices for all applicants.

**iii. Describe the impact of the improvements / changes on your organization.**

1. The completion of the Managing Cultural Differences Workshop ensures better oversight and that best practices are followed.

2. Registration staff are able to confidently oversee the decision writing process and assist the panel with providing clear decision and reason documents to applicants. Clearer decision and reason documents may, in some cases, reduce the likelihood of an appeal and prevent additional work for staff.
3. Registration committee members are able to make informed and fair decisions by applying the information from the education session.
4. Registration staff are aware of best practices as a regulator, more aware of the challenges faced by international applicants, and have a greater understanding of education systems in other countries.

#### **k) Mutual recognition agreements**

##### **i. Describe any improvements / changes implemented in the last year.**

No changes this year

##### **ii. Describe the impact of the improvements / changes on applicants.**

No changes this year

##### **iii. Describe the impact of the improvements / changes on your organization.**

No changes this year

#### **l) Other (include as many items as applicable)**

##### **i. Describe any improvements / changes implemented in the last year.**

1. A third gender option, "Other" was added to the application form. There is also an optional box where the applicant or member can indicate how they identify.
  2. The past year has been a transitional year for the College as it completed the review of more than 2400 applications that were made under the now-closed grandparenting route. A great deal of Council, committee and staff resources were dedicated to ensuring that reviews (at all levels) were transparent, objective, impartial and fair. Council and staff have also been focused on managing the process in order to provide timely decisions.
- At the same time, the College has been ramping up to process a greater than anticipated number of regular route applications. We have been – in particular, through the work of the Controlled Act Task Group and the educational program Review and Recognition process – working to make sure that information sharing around registration is frequent, consistent and done earlier.
- We are proud of the work that has been done this year and look forward to continuing our efforts to maintain fair registration practices for those hoping to practice under the Registered Psychotherapy title.

##### **ii. Describe the impact of the improvements / changes on applicants.**

1. Applicants and members who do not identify as male or female are able to select a third gender option.

##### **iii. Describe the impact of the improvements / changes on your organization.**

1. CRPO strives to be an inclusive regulatory body; this addition is a practical demonstration of this commitment.

##### **Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year**

No changes this year

## 2. Quantitative Information

### a) Languages

Indicate the languages in which application information materials were available in the reporting year.

Language	Yes/No
English	Yes
French	Yes

Other (please specify)

Additional comments:

### b) Gender of applicants

Indicate the number of applicants in each category as applicable.

Gender	Number of Applicants
Male	99
Female	555
None of the above	1

Additional comments:

CRPO had one applicant whose gender is listed as "Other".

### c) Gender of members

Indicate the number of members in each category as applicable. Select the option that best corresponds to the terminology used by your organization.

Gender	Number of Members
Male	1317
Female	5395
None of the above	1

Additional comments:

CRPO has one member whose gender is listed as "Other".

### d) Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
408	155	44	Australia 3 Brazil 1 China 1 Denmark 1 Ecuador 1 Ireland 1 France 1 Germany 1 India 4 Iran 3 Kazakhstan 1 OTHER 1 Mexico 1 Netherlands 1 Pakistan 1 Romania 1 Russia 1 Singapore 1 U.K. 2 Total 27	21	655

<sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

**Additional comments:**

Other entry is for 1 Libya.

**e) Jurisdiction where applicants who became registered members obtained their initial education**

Indicate the number of applicants who became registered members in the reporting year by the jurisdiction where they obtained their initial education<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
292	104	34	Australia 1 Denmark 1 Ecuador 1 Ireland 1 France 1 Iran 1 Kyrgyzstan 1 Romania 1 Singapore 1 U.K. 1 Total 10	5	445



<sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

**Additional comments:**

**f) Jurisdiction where members were initially trained**

Indicate the total number of registered members by jurisdiction where they obtained their initial education<sup>1</sup> in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Albania 1		
			Argentina 4		
			Australia 9		
			Brazil 8		
			Bulgaria 1		
			Sri Lanka 1		
			China 9		
			Denmark 1		
			Dominican Republic 2		
			Ecuador 1		
			Egypt 1		
			Ireland 6		
			El Salvador 1		
			France 5		
			Germany 4		
			Croatia 1		
			India 19		
			Israel 4		
			Italy 2		
			Iraq 1		
			Japan 1		
			Jamaica 2		
			Jordan 1		
4643	989	649	Kyrgyzstan 1	220	6713
			Korea, Republic Of 2		
			Mexico 10		
			Peru 2		
			Pakistan 3		
			Poland 5		
			Portugal 2		
			Serbia 1		
			Romania 5		
			Philippines 5		
			Russia 11		
			S. Africa 4		
			Singapore 1		
			Spain 3		
			Sudan 1		
			Switzerland 14		
			Taiwan, Province Of China 1		
			Turkey 1		
			U.K. 39		
			Ukraine 1		
			Uruguay 1		
			Venezuela 1		
			Iran 12		
			Somalia 1		
			Total 212		

<sup>1</sup> Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

**g) Applications processed**

Indicate the number of applications your organization processed in the reporting year:

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	407	155	44	28	21	655
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	0	0	0	0	0	0
Inactive applicants (applicants who had no contact with your organization in the reporting year)	0	0	0	0	0	0
Applicants who met all requirements and were authorized to become members but did not become members	12	2	1	2	23	40
Applicants who became FULLY registered members	377	69	53	25	26	550
Applicants who were authorized to receive an alternative class of licence <sup>3</sup> but were not issued a licence	8	2	1	1	0	12
Applicants who were issued an alternative class of licence <sup>3</sup>	345	132	42	22	9	550

<sup>1</sup> An alternative class of licence enables its holder to practice with limitations, but additional requirements must be met in order for the member to be fully licensed.

Additional comments:

**h) Classes of certificate/license**

Indicate and provide a description of the classes of certificate/license offered by your organization.

You must specify and describe at least one class of certificate/license (on line a) in order for this step to be complete.

#	Certification	Description
a)	Registered Psychotherapist	Description (a)

		Full member who has met all registration requirements.
<b>b)</b>	Registered Psychotherapist (Qualifying)	<b>Description (b)</b>
		Member who has met minimum requirements for registration. Must practise with clinical supervision and pass the Registration Examination.
<b>c)</b>	Registered Psychotherapist (Inactive)	<b>Description (c)</b>
		A member who intends to take an extended period of leave from their psychotherapy practice but wishes to maintain membership with the College.
<b>d)</b>	Registered Psychotherapist (Temporary)	<b>Description (d)</b>
		Member of a statutory regulatory body that regulates psychotherapy in another jurisdiction, who have a temporary offer of employment as a psychotherapist in Ontario.

Additional comments:

**i) Reviews and appeals processed**

State the number of reviews and appeals your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee	416	46	39	46	63	610
Applicants who initiated an appeal of a registration decision	35	5	7	4	0	51
Appeals heard	13	2	3	2	0	20
Registration decisions changed following an appeal	3	1	1	1	0	6

Additional comments:

**j) Paid staff**

In the table below, enter the number of paid staff employed by your organization in the categories shown, on December 31 of the reporting year.

When providing information for each of the categories in this section, you may want to use decimals if you count your staff using half units. For example, one full-time employee and one part-time employee might be equivalent to 1.5 employees.

You can enter decimals to the tenths position only. For example, you can enter 1.5 or 7.5 but not 1.55 or 7.52.

Category	Staff
Total staff employed by the regulatory body	18
Staff involved in appeals process	5
Staff involved in registration process	8

Additional comments:

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### 3. Submission

I hereby certify that:

**Name of individual with authority to sign on behalf of the organization:**

Deborah Adams

**Title:**

Registrar

**Date:**

2019/02/21

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