



FAIRNESS COMMISSIONER

COMMISSAIRE À L'ÉQUITÉ

OFFICE OF THE FAIRNESS COMMISSIONER

595 Bay Street, Suite 1201, Toronto ON M7A 2B4

Fair Registration Practices Report 2020

The Fair Registration Practices Report was created as required in the:

- Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) s.20 and 23(1), for the regulated professions named in Schedule 1 of FARPACTA
- Health Professions Procedural Code set out in Schedule 2 of the Health Professions Act, 1991 (RHPA) s. 22.7(1) and 22.9(1), for health colleges

Guidelines for this report are available to download as a .pdf on the OFC website.

<https://www.fairnesscommissioner.com/en/Publications/Pages/Guidelines.aspx>

Organization: College of Registered Psychotherapists of Ontario

Name of the regulated profession: Registered Psychotherapist

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Qualitative Information

The following qualitative information is collected for the purpose of highlighting a regulator's enhancements to improve fair access year over year, including actions that result from recommendations made in the OFC's Assessment of Registration Practices.

For each of the categories below, where applicable, please describe any improvements/changes implemented in the last year by your organization or a third-party for the purpose of changing fair access.

Please also describe the impact of these improvements/changes on applicants. If you have been working on improvements/changes over the last year that have not yet been implemented, describe your progress and the expected impact the improvements/changes will have on applicants and your organization.

Provide as much detail as possible. This can include the rationale for the improvements/changes, relevant findings from preliminary work leading up to the improvements/changes, methodology, relevant dates and anything else you think is important.

Include as much supporting material as possible to support your description (e.g., relevant reports, policies, protocols, websites, other documents and anything else you think is important). This material can be provided in the form of hyperlinks to electronic sources.

a. Requirements for registration, including acceptable alternatives

i) Describe any improvements / changes implemented in the last year

1. At the time of application, CRPO requires a transcript or credential assessment sent directly from the institution or credential assessment provider to CRPO. Between March 2020 and the end of July 2020, CRPO accepted an unofficial transcript uploaded by the applicant. This flexibility was allowed due to some institutions being closed or unable to send official transcripts due to the pandemic. Applicants were asked at the time of application to confirm in writing that they agreed to submit an official transcript or credential assessment directly from the institution or credential assessment provider to CRPO prior to being eligible to sign up for the Registration Exam.



CRPO previously required all transcripts to be sent via mail. We now accept either mailed transcripts or emailed transcripts sent directly from the institution.

2. At the time of application, CRPO requires a completed statutory declaration signed by an authorized individual (e.g., Commissioner of Oaths, notary public or lawyer). Between March 2020 and the end of July 2020, CRPO accepted a statutory declaration only signed by the applicant. This flexibility was allowed because, at the start of the pandemic, virtual services were not widely available to have a statutory declaration completed. Applicants were asked at the time of application to confirm in writing that they agreed to submit a statutory declaration signed by an authorized individual to CRPO prior to being eligible to sign up for the Registration Exam.

3. At the time of application, an applicant must be substantially completed their education program. Normally, substantial completion means an applicant:

- is in their final semester prior to graduation;
- has completed 90% of their program, including coursework and clinical placements; or
- has completed their program with the exception of a thesis.

CRPO is aware that many students were, and still are, delayed in obtaining and completing their clinical placements as part of their psychotherapy program due to the pandemic. Since March 2020, CRPO has accepted applications from students who have substantially completed their coursework (i.e., 90% done classroom courses) even if they have not started or substantially completed clinical placements.

ii) Describe the impact of the improvements / changes on applicants

1. The flexibility with transcripts allowed applicants to still submit their application and register with CRPO if they met all the registration requirements.

2. The flexibility with statutory declarations allowed applicants to still submit their application and register with CRPO if they met all the registration requirements.

3. The flexibility with substantial completion of education allows applicants to submit their application and register with CRPO if they met all the registration requirements.

iii) Describe the impact of the improvements / changes on your organization



1. Significant staff time was required to track and communicate with applicants who submitted unofficial transcripts and were required to submit an official transcript prior to being eligible to sign up for the exam.
2. Significant staff time was required to track and communicate with applicants who did not submit a statutory declaration signed by an authorized individual and were required to submit one prior to being eligible to sign up for the exam.
3. A more detailed review of transcripts is required to determine whether an applicant is substantially completed their coursework.

b. Assessment of qualifications

- i) Describe any improvements/changes implemented in the last year
No changes.
- ii) Describe the impact of the improvements/changes on applicants
No changes.
- iii) Describe the impact of the improvements/changes on your organization
No changes.

c. Provision of timely decisions, responses, and reasons

- i) Describe any improvements/changes implemented in the last year
No changes.
- ii) Describe the impact of the improvements/changes on applicants
No changes.
- iii) Describe the impact of the improvements/changes on your organization
No changes.

d. Fees

- i) Describe any improvements/changes implemented in the last year



1. The fee for renewal is due annually by March 31. For 2020, CRPO extended the payment deadline to June 1 and did not issue a late fee (\$150 +HST) to anyone who submitted their renewal form by March 31 and payment by June 1.
 2. For fees paid to CRPO, CRPO's by-laws set out that fee increases occur every two years for inflation. CRPO's fees were scheduled to increase in June 2020. Due to the pandemic, CRPO did not increase fees. The fees will increase in June 2022.
 3. The fee for the Registration Exam is set and paid to the third-party administrator, COMPASS. At the start of 2020, COMPASS had planned to increase the fee from \$525 +HST to \$545 +HST starting with the October 2020 administration of the exam. Due to the pandemic, COMAPSS decided not to increase the fee until the October 2021 administration of the exam.
 4. The cost for a program to apply for review and recognition was \$4000 +HST, which is paid directly to the Registration Committee approved third-party reviewer, Word It Write. The fee amount had not changed since 2015 when CRPO was first proclaimed. In 2020, Word It Write increased the fee to \$4500 +HST to account for inflation.
- ii) Describe the impact of the improvements/changes on applicants
1. Registrants had additional time to make the payment for renewal in 2020.
 2. Applicants were not required to pay increased fees in 2020.
 3. Registrants who wrote the exam were not required to pay an increased fee in 2020.
 4. Programs who applied for recognition in 2020 were required to pay the increased fee.
- iii) Describe the impact of the improvements/changes on your organization
1. Significant staff time was required to track and communicate extended deadlines for renewal.

There was a financial impact to CRPO for waiving late fees from April 1 to June 1.



2. Financial impact to CRPO since fees were not increased.
3. No impact to CRPO since the fee is paid directly to COMPASS.
4. No impact to CRPO since the fee is paid directly to Word It Write.

e. Timelines

i) Describe any improvements/changes implemented in the last year

1. There was an increase in the number of applications received in 2020 compared to 2019 by approximately 23%. In 2019, CRPO had 6 staff involved in registration process. In 2020, this was increased to 8.5 staff to account for the increase in applications received.

2. Typically, COMPASS offers the Registration Exam in April and October each year. The exam is computer-based and is written in person at a test centre. The exam is written after registering in the Registered Psychotherapist (Qualifying) category and is one of the requirements required to transfer to the Registered Psychotherapist category. Due to the pandemic, the April 2020 exam was cancelled. In May 2020, CRPO's Examination Committee granted a mass extension to exam writing timelines for those impacted by pandemic to write at one of the next two available exam sittings. COMPASS added two additional days to the October 2020 exam sitting. Despite the additional days added to the October administration, less than half the registrants who intended to write the exam were able to secure a seat due to physical distancing requirements and test centre closures resulting from the pandemic.

While not part of the 2020 reporting year, CRPO would like to note that the exam was offered via remote proctoring for April 2021.

ii) Describe the impact of the improvements/changes on applicants

1. There is no change in application processing timelines for applicants.
2. Many registrants were delayed in writing the exam.

Many registrants were also delayed in transferring from the Registered Psychotherapist (Qualifying) to the Registered Psychotherapist category if they met the clinical experience requirement to transfer (450 direct client contact



hours and 100 clinical supervision hours) and passing the exam was the only outstanding requirement.

iii) Describe the impact of the improvements/changes on your organization

1. CRPO processed more applications with the increased number of registration staff.

2. Increased communication with registrants and stakeholders regarding the exam was required. CRPO posted regular updates on our website and in communiqués as information became available. Further, regular updates were provided to CRPO's Registration Committee, Examination Committee, Executive Committee and Council. The committees considered concerns and questions raised by registrants and stakeholders and worked to provide as much flexibility as possible within the Registration Regulation.

Staff processing of requests to sign up for the exam was double the normal volume for the October 2020 administration due to the cancellation of the April 2020 administration.

There was also a financial impact to CRPO due to fewer registrants transferring from Registered Psychotherapist (Qualifying) to Registered Psychotherapist.

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

i) Describe any improvements/changes implemented in the last year

1. The Registration Committee approved a Clinical Experience for Registration Policy. The policy communicates what is expected for direct client contact and clinical supervision hours required by a registrant to transfer from Registered Psychotherapist (Qualifying) to Registered Psychotherapist and for Registered Psychotherapist independent practice.

<https://www.crpo.ca/wp-content/uploads/2020/11/Clinical-Experience-for-Registration-Policy.pdf>

2. The Registration Committee approved a Program Recognition Policy. This policy replaces the Framework for Reviewing and Recognizing Education and Training Programs, which was developed by the Transitional Council.



<https://www.crpo.ca/wp-content/uploads/2020/11/Program-Recognition-Policy.pdf>

3. The Examination Committee approved a revised Examination Appeals Policy. The policy was revised to incorporate that an appeal must present a compelling and substantiated reason for the exam failure. The revised policy outlines what the Examination Committee strongly considers for an appeal to be compelling and substantiated.

<https://www.crpo.ca/wp-content/uploads/2021/03/Examination-Appeal-Policy.pdf>

Note: The Exam Appeals Policy linked above includes further revisions that were made in 2021 to account for the exam being offered via remote proctoring in 2021.

4. The Registration Committee clarified expectations for supervision for Registered Psychotherapist (Qualifying) registrants who met the clinical experience hours for transferring to the Registered Psychotherapist category or Registered Psychotherapist independent practice but were unable to write the exam due to the pandemic.

<https://www.crpo.ca/pandemic-related-impacts-to-rp-qualifying-registrants/>

- ii) Describe the impact of the improvements/changes on applicants
 - 1. Increased transparency regarding the requirements for clinical experience hours to be accepted.
 - 2. Increased transparency regarding the requirements for a program to apply and meet the requirements for program recognition.
 - 3. Increased transparency regarding the requirements and expectations for reporting issues and substantiating reasons for an examination appeal.
 - 4. Registered Psychotherapist (Qualifying) registrants who were impacted by the pandemic and unable to write the exam but met the clinical experience requirements to transfer to the Registered Psychotherapist category were able to reduce the frequency at which they receive clinical supervision. Clinical



supervision can be costly so reducing the frequency of supervision while still protecting the well-being of clients, would result in cost savings for registrants who pay for supervision out of pocket.

iii) Describe the impact of the improvements/changes on your organization

1. The policy aids staff and the Registration Committee in deciding whether clinical experience hours meet the registration requirements. Staff can also direct applicants and registrants to the policy if they have questions about the requirements for clinical experience hours.

2. The policy aids Word It Write and the Registration Committee in deciding whether a program has met the requirements for recognition. Staff can also direct programs to the policy if they have questions about the requirements for recognition.

3. The revised Examination Appeals Policy sets the expectation that a registrant reports issues or extenuating circumstances prior to the exam, on exam day, or within seven days of the exam. This allows CRPO and COMPASS to investigate and collect information to verify any procedural irregularities that may have occurred. Prior to this policy change, most registrants did not report issues until after exam results were released six to eight weeks after the exam. This made it difficult to verify information with testing sites and proctors due to the elapsed time since exam day.

4. No impact.

g. Resource for applicants

i) Describe any improvements/changes implemented in the last year

CRPO added a COVID-19 FAQ page and sent out 13 bulletins with information regarding the pandemic to provide updates, circulate information from the Ministry, and answer practice questions:

<https://www.crpo.ca/faqs-covid-19/>

ii) Describe the impact of the improvements/changes on applicants

Increased accessibility of information.



- iii) Describe the impact of the improvements/changes on your organization

Staff can direct prospective applicants and current registrants to the resources available on the website in response to their inquiries. By having this information available online, CRPO staff can more efficiently respond to inquiries and refer individuals 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 registrant services.

h. Review or appeal processes

- i) Describe any improvements/changes implemented in the last year

No changes.

- ii) Describe the impact of the improvements/changes on applicants

No changes.

- iii) Describe the impact of the improvements/changes on your organization

No changes.

i. Access to applicants' records

- i) Describe any improvement/changes implemented in the last year

No changes.

- ii) Describe the impact of the improvements/changes on applicants

No changes.

- iii) Describe the impact of the improvements/changes on your organization

No changes.

j. Training and resources for registration staff, Council, and committee members

- i) Describe any improvements/changes implemented in the last year



1. In March 2020, Council adopted several competency matrices, which include defined competencies that articulate the knowledge skills and experience required of individuals on Council and committees.

<https://www.crpo.ca/council-committees/>

These defined competencies were used while recruiting eight non-Council committee members in 2020. In the callout to registrants for the non-Council positions, CRPO encouraged applications from BIPOC RPs:

<https://www.crpo.ca/call-for-non-council-member-appointments/>

For Council and committee training, we developed an updated orientation module specific to panel meetings.

Additionally, we continue to expand our resource library for Council and non-Council members and have begun conducting regular education sessions at Council meetings (e.g., Bias & Professional Expertise, Privacy Law, Board Evaluation). This year, Council plans to include education sessions regarding equity, diversity, and inclusion.

2. Three registration staff completed professional development training offered by the University of Ottawa in Policies and Procedures for Compliance & Consistency.

3. One registration staff person completed a train the trainer certification in Intercultural Competency offered by the Cross Cultural Learner Centre. This staff person then provided training to all CRPO staff on intercultural competency.

ii) Describe the impact of the improvements/changes on applicants

1. This is to be determined as many of the new non-Council members began their positions in the fall 2020 and early 2021. The recruitment of non-Council committee members has improved diversity on committees. The process for recruitment of non-Council committee members is more transparent.

2. Staff have been and continue to review our procedures related to applications to improve efficiency and ensure consistency and objectivity.



3. Registration staff can ensure transparent and fair registration practices for applicants from diverse backgrounds. By promoting intercultural competency in its staff members, the College is also able to provide applicants with a positive registration experience.

iii) Describe the impact of the improvements/changes on your organization

1. More transparent and thorough Council and non-Council member recruitment/orientation process, more knowledgeable and diverse Council and non-Council members, leading to more effective decisions.

2. Updating written procedures has assisted in training staff in an efficient manner.

3. This training encouraged the development of practices and behaviours to communicate and work productively and respectfully across cultures. Through this training, staff involved in the registration process are better able to assist applicants in a positive and effective way.

k. Mutual recognition agreements

i) Describe any improvements/changes implemented in the last year

No changes.

ii) Describe the impact of the improvements/changes on applicants

No changes.

iii) Describe the impact of the improvements/changes on your organization

No changes.

l. Describing any improvements/changes implemented in the last year

i) Describe any improvements/changes implemented in the last year

No additional changes to report.

ii) Describe the impact of the improvements/changes on applicants

No additional changes to report.



iii) Describe the impact of the improvements/changes on your organization
No additional changes to report.

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

No changes.

Provide any additional information:

No additional information to report.

Quantitative Information

The following quantitative information is collected for the purpose of observing statistical changes and trends related to application, licensure, appeals and staffing year over year.

a. Languages

Indicate the languages in which application materials and information about the application process are available.

Language	Yes/No
English	Yes
French	Yes

Other (please specify):

b. Gender applications

Indicate the number of applicants in each category as applicable

Gender	Number of applicants
Male	165
Female	949
None of the above	12

Additional comments:



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	1553
Female	6760
None of the above	15

Additional Comments:

For the following sections d,e & f, the OFC recognizes that the term initial education infers that applicants may receive their education in multiple jurisdictions.

For the purpose of these questions, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

d. Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education in the profession or trade

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)		Unknown	Total
637	359	57	Armenia	1	0	1126
			Australia	3		
			Austria	1		
			Brazil	4		
			Chile	1		
			Colombia	3		
			Cyprus	1		
			France	1		
			Hong Kong	4		
			India	14		
			Iran	10		
			Israel	2		
			Jamaica	1		



			Kyrgyzstan	1		
			Macau	1		
			Malaysia	1		
			Mexico	1		
			Netherlands	1		
			New Zealand	1		
			Nigeria	1		
			Pakistan	1		
			Philippines	1		
			Russia	1		
			South Africa	1		
			Ukraine	2		
			United Kingdom	13		
			Uruguay	1		

Additional comments:

- 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 in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)		Unknown	Total
632	285	42	Armenia	1	0	1021
			Australia	2		
			Austria	1		
			Belgium	1		
			Brazil	5		
			China	1		
			Colombia	1		
			Cyprus	1		



			Dominican Republic	1		
			Hong Kong	2		
			India	16		
			Iran	10		
			Israel	2		
			Italy	2		
			Jamaica	2		
			Kyrgyzstan	1		
			Malaysia	1		
			New Zealand	1		
			Nigeria	1		
			Philippines	1		
			Russia	1		
			Scotland	1		
			South Africa	2		
			United Kingdom	5		

Additional comments:

f. Jurisdiction where members were initially trained

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

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)		Unknown	Total
5313	1569	868	Afghanistan	1	3	8328
			Albania	2		
			Argentina	7		
			Armenia	1		
			Australia	20		
			Austria	2		



			Azerbaijan	1		
			Bangladesh	6		
			Barbados	3		
			Belarus	1		
			Belgium	2		
			Brazil	15		
			Bulgaria	1		
			China	14		
			Colombia	8		
			Cuba	1		
			Cyprus	1		
			Dominican Republic	2		
			Egypt	3		
			El Salvador	1		
			Finland	1		
			France	9		
			Georgia	1		
			Germany	6		
			Greece	1		
			Hong Kong	6		
			Hungary	1		
			India	67		
			Iran	81		
			Iraq	1		
			Ireland	10		
			Israel	9		
			Italy	6		
			Jamaica	10		
			Japan	1		
			Jordan	3		
			Kazakhstan	2		
			Kenya	2		
			Kyrgyzstan	1		
			Lebanon	1		
			Libya	1		
			Malaysia	2		



			Mauritius	1		
			Mexico	15		
			Moldova	2		
			Netherlands	6		
			New Zealand	4		
			Nigeria	1		
			Pakistan	20		
			Peru	2		
			Philippines	8		
			Poland	12		
			Portugal	2		
			Romania	4		
			Russia	23		
			Scotland	1		
			Senegal	1		
			Serbia	2		
			Somalia	1		
			South Africa	14		
			South Korea	5		
			Spain	9		
			Sri Lanka	1		
			Sweden	1		
			Switzerland	31		
			Trinidad and Tobago	1		
			Turkey	4		
			Ukraine	5		
			United Kingdom	82		
			Venezuela	3		



g. Application processed

Indicate the number of applications your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	637	359	57	73	0	1126
Applicant actively pursuing licensing. Those who had some contact with your organization in the reporting year	0	0	0	0	0	0
Inactive applicants. Those 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 <u>but did not</u> become members	1	1	1	1	0	4
Applicants who became <u>fully</u> registered members	12	3	0	0	0	15
Applicants who were authorized to receive an alternative licence <u>but were not</u> issued a licence	1	1	1	1	0	4
Applicants who were issued an alternative class of licence*	620	282	42	62	0	1006

- 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/licence

Provide a description of the classes of certificate/license offered by your organization. You should have at least one class listed.

#	Certification	Description
1	Registered Psychotherapist	Full registrant who has met all registration requirements.
2	Registered Psychotherapist (Qualifying)	Registrant who has met minimum requirements for registration. Must practise with clinical supervision and pass the Registration Examination.
3	Registered Psychotherapist (Inactive)	Registrant who intends to take an extended period of leave from their psychotherapy practice but wishes to maintain registration with the College.
4	Registered Psychotherapist (Temporary)	Registrant 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. Enter the data by jurisdiction where applicants were initially trained in the



profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applicants that were subject to an internal review or that were referred to a statutory committee of your governing council, such as Registration Committee	86	10	7	25	0	128
Applicants who initiated an appeal of a registration decision	5	1	1	7	0	14
Appeals heard	12	1	0	3	0	16
Registration decisions changed following an appeal	1	0	0	1	0	2

Additional comments:

j. Paid Staff

Provide the number of paid staff employed by your organization in the categories shown, as of December 31, 2020.

You may use decimals if you need to count half units. For example, on full-time employee plus one part-time employee will be equivalent to 1.5 employees.

Category	Number of staff
Total number of staff employed by the regulatory body	21.5
Number of staff involved in the appeals process	4
Number of staff involved in the registration process	8.5

Additional comments:



Submission

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

Title: Mark Piro, Acting Registrar

Date: April 29, 2021