

COUNCIL AGENDA

Date: Thursday, April 27, 2023
Time: 1:00 p.m. to 2:00 p.m.
Location: Zoom videoconference
Chair: Kenneth Lomp, President

	Time	Item	Materials	Pg#	Action	Presenter
1. WELCOME & INTRODUCTIONS						
1.a.	1:00	Welcome and Opening Remarks			Information	K. Lomp
1.b.	1:02	Approval of Agenda	1. Draft Agenda		Decision by motion	K. Lomp
1.c.	1:04	Conflict of interest declarations <i>Council is asked to complete and return the Conflict-of-Interest Declaration form to document their status relative to the agenda prior to the meeting.</i>	1. COI disclosure form		Information	K. Lomp
2. DISCUSSION & DECISIONS						
2.a.	1:05	Ontario Regulation 508/22 (Registration Requirements) made under the Regulated Health Professions Act, 1991 <i>Council is being asked to approve the amendments to the Ontario Regulation 67/15: Registration Regulation.</i>	1. Briefing Note 2. Consultation and Draft Amendments 3. Public Consultation Feedback Summary Report		Discussion, decision by motion	K. Lomp
3.	2:00	ADJOURNMENT			MOTION	K. Lomp
		2023 Council Meetings: <ul style="list-style-type: none"> ● May 18, 2023 CANCELLED ● June 22, 2023 ● September 14, 2023 ● December 7, 2023 				

Conflict of Interest Disclosure Form

Meeting Date: April 27, 2023
Council / Committee: Council
Meeting type: plenary

I acknowledge and agree that an actual or perceived conflict of interest can undermine confidence in the College and its ability to fulfil its public interest mandate. I have read and understood the [College's by-laws](#) on conflict of interest, the **Conflict of Interest Worksheet** (Appendix A), and the **Process for Considering & Declaring Conflicts of Interest** (Appendix B) document.

I agree to take all reasonable steps to avoid any actual or perceived conflict of interest from arising and, if one cannot be avoided, I undertake to declare any real, perceived, or potential conflict of interest and to recuse myself from any consideration of the matter at issue.

I have NO conflict of interest to report regarding any of the agenda items to be discussed at the above noted meeting.

I declare a conflict of interest with one or more of the agenda items to be discussed at the above noted meeting.

I certify that the information above is true and complete to the best of my knowledge.

WORKSHEET: Conflict of Interest

What is a conflict of interest?

A conflict of interest may be defined as any financial, personal, professional or emotional interest that could reasonably be perceived as interfering with the exercise of a person's public duties, for example as a CRPO Council, committee or panel member.

Self-screening Questions

Not sure if you are in a conflict of interest? In assessing for conflicts of interest, know that each situation will vary and have its own specific context. Consider the following questions & examples:



Financial interest

Do you stand to be affected financially by the outcome of this decision?

Example: The College is considering mandating all registrants to complete a course on the safe and effective use of self (SEUS). One Council member runs a business offering SEUS workshops. They declare a conflict of interest.

Example: The Council is discussing whether they would find College-provided iPads mounted in the meeting room for each Council member to be helpful. One Council member owns a small number of shares of Apple, Inc. Since the financial implication for the Council member is negligible or non-existent, they do not declare a conflict of interest.



Personal or professional relationship

Have you had a personal or professional relationship, e.g. friend, family, instructor, student, supervisor, supervisee, employer, employee, colleague, with any of the individuals involved in the matter?

Example: A Registration Committee panel member taught at the education program from which an applicant obtained some of their education. They declare a conflict of interest.

Example: An Inquiries, Complaints and Reports Committee panel member attended a two-day workshop seven years ago with the respondent's clinical supervisor. Since the contact was brief and occurred long ago, they do not declare a conflict of interest.



Professional bias. Do you have a private or publicly stated opinion that could reasonably be perceived as interfering with my ability to consider one or more of the issues with an open mind?

Example: There are two well-known camps regarding how best to conduct a particular model of psychotherapy. A Quality Assurance Committee member who falls firmly into Camp A is reviewing the peer and practice assessment report of a registrant who falls into Camp B. They declare a conflict of interest.

Example: An Inquiries, Complaints and Reports Committee panel member has published work about the harms of breaching therapist-client boundaries. They are reviewing a complaint involving an alleged breach of boundaries. Since there is no reasonable disagreement within the profession, and assuming they are not emotionally biased, they do not declare a conflict of interest.



Emotional bias

For whatever reason, do your ideas or emotions prevent you from considering one or more of the issues with an open mind?

Example: Based on personal experience, an Examination Committee member has an emotional reaction to a candidate's rationale for needing to extend the normal timeframe within which to write the exam. They declare a conflict of interest.

Example: A panel of the Inquiries, Complaints and Reports Committee is dealing with serious allegations of misconduct. After discussing and processing the emotional impact of reviewing the materials, they all reassure themselves that they can consider the situation with an open mind.



Interests of Related Persons

Are you aware that your parent, child, spouse or sibling has any of the above interests respecting Council, committee or panel business?

Example: A Registration Committee member's child is attending a program coming before the Committee to seek Recognition. They declare a conflict of interest.

Example: An Inquiries, Complaints and Reports Committee panel is considering a complaint by a firefighter. One panel member's spouse is

also a firefighter. Assuming there is no emotional bias, the profession of the panel member's spouse would not reasonably be seen as interfering with the panel member's duties. They do not declare a conflict of interest.



Threshold analysis

Would a reasonably well-informed person perceive that the above interest could interfere with the exercise of your public duties?

Example: A Discipline Committee panel member was employed at the same large agency at the time the alleged misconduct occurred. While the panel member had no prior knowledge of the alleged events, the panel member is close colleagues with a key witness in the case. There was a reasonable apprehension of bias on the part of the panel member.

Example: A complainant appeals a decision of the Inquiries, Complaints and Reports Committee taking no action against a registrant. Through Google, the complainant discovered that a panel member was a LinkedIn contact of the respondent. The panel member clarified they only met once briefly three years ago. Even though it may have been preferable for that panel member not to participate, this was not found to be a conflict of interest.

APPENDIX B

Process for Considering & Declaring Conflicts of Interest

The following are steps the College follows in addressing conflicts of interest.



Staff pre-screening

- Staff will pre-screen agenda items for obvious conflicts of interest on the part of Council, committee or panel members.
 - If a conflict is identified staff will alert the Chair and materials will not be sent to the conflicted member.
 - The matter will either be assigned to a different panel, or the conflicted member will be alerted in advance that they will not be present for the entire meeting.
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Council, committee or panel member self-screening

- Go through the above self-screening.
 - If a concern is identified that does not rise to the threshold of a conflict of interest, consider making a courtesy declaration at the meeting to reassure the Council, committee or panel that you have considered the issue.
 - If unsure, consult with staff, legal counsel or the Chair. It is preferable to consult with staff or legal counsel before the Chair to avoid the risk of tainting the Chair.
 - In close cases, consider the potential benefit of declaring a conflict to avoid later disputes about whether or not there was a conflict of interest.
 - If you identify a conflict of interest, do not review the meeting materials further and securely delete them. Alert the Chair and support staff in advance of the meeting. Always declare in a general manner so as not to cause emotional bias on the listener's part.
 - Subsequently, declare the conflict at the meeting itself. Do not take part in or attempt to influence the deliberation and leave the room while deliberation is taking place. The general nature of conflict will be recorded in the minutes.
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Council, committee or panel discussion of possible conflicts of interest

- Occasionally, you may become aware that another member may have a conflict. If that member does not declare a conflict, or if they are unsure, all members are responsible at the meeting for raising the concern and discussing whether it constitutes a conflict of interest.
- In rare cases of disagreement, a majority of those present can vote to find there is a conflict and exclude the conflicted member from considering the matter.

- Post Meeting Conduct: After recusing yourself on a matter, use professional discretion and avoid revisiting the issue with colleagues, even if the decision is on the public register or you have seen the meeting minutes.¹

¹ Council minutes are public documents (aside from in camera portions). Regarding committee and panel minutes, normally it will not be considered that viewing minutes by a panel member who has declared a conflict poses a risk of improperly affecting the College's decision. However, occasionally confidentiality and risk management may require that panel minutes not be viewed by a member who has declared a conflict of interest.

Briefing Note for Council

Meeting Date:	April 27, 2023
Agenda Item #	2a
Issue:	Registration Regulation Amendments
Attachment(s):	Consultation and Draft Amendments Public Consultation Feedback Summary Report
References:	O. Reg. 508/22: REGISTRATION REQUIREMENTS
For:	Information <input checked="" type="checkbox"/> Discussion <input checked="" type="checkbox"/> Decision <input checked="" type="checkbox"/>
Staff Contact:	M. Piore, S. Fraser, D. Adams

Purpose & Public Interest Rationale:

The government of Ontario has determined the need to increase health human resource capacity to help Ontario respond and recover from the pandemic by enabling the implementation of amendments to the *Regulated Health Professions Act, 1991* (RHPA) that include an 'emergency class' of registration for qualified practitioners.

In developing the emergency class, CRPO must ensure that public protection is not undermined and that a reasonable approach is being taken to registering appropriate applicants in the emergency class.

Background:

As part of its response to the pandemic, the government introduced [Bill 106, Pandemic and Emergency Preparedness Act, 2022](#) which proposed to amend the RHPA to prohibit colleges from requiring Canadian experience, to establish expectations related to language proficiency requirements, to prescribe time limits for the review and approval of registration applications, and to require colleges to establish an emergency class of registration.

In August of 2023, the provisions of [O. Reg. 508/22: REGISTRATION REQUIREMENTS](#) requiring an emergency class of registration will be proclaimed into force. The class must include the specific emergency circumstances that will trigger the use of this class, a maximum term for the class to be open, and the circumstances under which a registrant in the emergency class would become eligible for another class of registration.

The Ministry requires that the final version of the regulation, finalized after a 60-day consultation period, be submitted by May 1, 2023.

As such, the Executive Committee approved a regulation amendment process as follows:

- January 25: Council to be updated on requirements and asked to direct Registration Committee to review and approve draft regulation for mandatory circulation
- January 27: the attached DRAFT Amendments to Ontario Regulation 67/15: Registration be presented to the Registration Committee for their review and approval for circulation

- January 30: staff to post draft regulation for circulation and comments
- April 3: Registration Committee to review feedback and determine if the proposed draft can be submitted to Council for approval as circulated or with amendments based on responses received during circulation
- April 27: Council to convene for one-hour special meeting during scheduled Executive Committee meeting to take recorded vote on the regulation
- April 28: staff to submit the regulation package to government

The public consultation closed on March 31. The Registration Committee, acting on Council's direction, reviewed the feedback at their April 3 meeting. Through this review, they determined that the draft could be presented to Council as circulated for consultation without suggesting changes based on any of the feedback obtained from the consultation.

The Council is asked to consider whether they approve the draft regulation as circulated based on the Registration Committee's recommendation or with amendments based on feedback received during circulation.

Proposed Motion:

[Be it moved] that Council approve the Amendments to Ontario Regulation 67/15: Registration as circulated/amended.

Consultation

Registration Regulation Amendments

Introduction:

This consultation document is released on behalf of the College of Registered Psychotherapists of Ontario (CRPO) to seek feedback from registrants and stakeholders about proposed amendments to the [Registration Regulation](#) under the *Psychotherapy Act, 2007* that would introduce an Emergency Class of registration, revise registration examination writing deadlines to coincide with the date of registration rather than application, and clarify that at least one successfully completed program is required to meet the education requirement. The proposed draft amendments to the Registration Regulation are attached as Appendix A¹.

Background:

Emergency Class

The government of Ontario has determined the need to increase health human resource capacity to help Ontario respond and recover from the pandemic by enabling the implementation of amendments to the *Regulated Health Professions Act, 1991* (RHPA) that include an 'emergency class' of registration for qualified practitioners.

As part of its response to the pandemic, the government introduced [Bill 106, Pandemic and Emergency Preparedness Act, 2022](#) which proposed to amend the RHPA to prohibit colleges from requiring Canadian experience, to establish expectations related to language proficiency requirements, to prescribe time limits for the review and approval of registration applications, and to require colleges to establish an emergency class of registration.

The regulation for the emergency class must include the specific emergency circumstances that will trigger the use of this class, a maximum term for the class to be open, and the circumstances under which a registrant in the emergency class would become eligible for another class of registration. The Ministry of Health requires that the final version of the regulation, finalized after a 60-day consultation period, be submitted by May 1, 2023. In August of 2023, the provisions of [O. Reg. 508/22: REGISTRATION REQUIREMENTS](#) requiring an emergency class of registration will be proclaimed into force.

Exam Writing Deadlines

The Registration Regulation sets out that a Qualifying registrant must successfully complete the registration examination set or approved by the Registration Committee within three attempts. The Registration Regulation specifies that the first exam attempt must be made within the 24-month period following the date of application, and final exam attempt must be made within the five-year period following the date of application, unless a panel of the Examination Committee is

¹ The proposed amendments are available in English only; translation will be completed by the Ministry of Health once the revised regulation is approved.

satisfied that exceptional circumstances prevented the applicant from taking the registration examination within these periods.

Since the registration examination can only be written once an applicant is deemed to have met certain registration requirements, delays in the application approval process impact the amount of time and number of available exam administrations a Qualifying registrant has to make their exam attempts.

Completed Program

The Registration Regulation sets out that an applicant must have either:

- successfully completed a program or master's degree in psychotherapy approved by the Registration Committee (i.e., CRPO recognized program/accepted bridging program), or
- successfully completed a program that is substantially equivalent to an approved program, or
- have such other education and training, which must include one or more programs in psychotherapy, together with any further education or training, or combination of education and training, that when taken together evidences successful completion of a program that is substantially equivalent to an approved program.

CRPO intends the final option to mean that the applicant must have successfully completed at least one master's level program/degree in psychotherapy and that the program in combination with additional education and training (e.g., individual courses) taken altogether is substantially equivalent to an approved program.

Note: The Registration Regulation allows an applicant to apply and register in the Qualifying class once they have substantially completed their education and training if they are actively pursuing the completion of the training. The proposed amendment to the Registration Regulation will not impact this.

Proposed Registration Regulation Amendments:

Emergency Class

Specifying emergency circumstances

The emergency class is open only when there is an emergency. The draft regulation needs to specify who determines there is an emergency that necessitates the application process for the emergency class to be open. It is proposed that it is CRPO Council that determines there is an emergency requiring the quick and flexible registration of more RPs that would directly assist in the emergency. In making this determination, the Council may take into account all of the relevant circumstances including the presence of a significant interruption in the processing of applications for registration for other classes such that there is a lengthy delay in applicants being registered and any requests by the Minister to initiate registrations under the emergency class.

Registration requirements to apply for the emergency class

The registration requirements for the emergency class need to balance public protection and flexibility. The College wants to ensure only competent practitioners are registered but the process needs to be more flexible than the regular route to open the door to more practitioners to

assist in the emergency. Adding too many registration requirements will also impact processing timelines which need to be expedient in an emergency.

The current requirements for the temporary class and labour mobility were reviewed in considering what requirements to propose for the emergency class.

The requirements in the Registration Regulation that apply to all classes of registration would also apply to the emergency class, including requirements related to:

- completing the jurisprudence module
- submitting a complete application with applicable fees
- good character
- good standing with other current and past regulatory bodies
- the absence of physical or mental conditions or disorders which in the public interest would necessitate the application of terms, conditions or limitations or refusal of registration
- language proficiency
- professional liability insurance

The following registration requirements are proposed for the emergency class:

- The applicant must have been registered to practise psychotherapy in another regulated jurisdiction in which the requirements are similar to CRPO's education, clinical experience, and registration examination requirements for the Registered Psychotherapist class.
 - This requirement ensures the applicant has training and experience in the profession and that they have undergone an application review in another jurisdiction. The requirements in the other jurisdiction need to be similar but not identical to CRPO's requirements, which allows for flexibility.
 - Using this requirement also means the applicant would not complete the mapping tool evaluation, which is time consuming for both the applicant and staff to review.
 - The temporary class includes this requirement but requires registration in another jurisdiction to be current. It is proposed for the emergency class that the registration in another jurisdiction be current or in the past to add flexibility.
- The applicant must have practised the profession within three years prior to submitting their application.
 - This is similar to the currency requirement of the labour mobility route and more flexible than the currency requirement of 750 currency hours in the three years prior to submitting an application.

Terms, conditions and limitations on emergency class of registration

The following TCLs are the same for all classes of registration, including the emergency class:

- Reporting changes to conduct and registration with other regulators.
- Using only the title and abbreviation on their certificate of registration.
 - For the emergency class, this would be Registered Psychotherapist (Emergency Class) or the abbreviation RP (Emergency Class).
- Maintaining PLI and reporting within two days if they do not have PLI.
- Practising only in the area of psychotherapy in which they have the necessary knowledge, skill and judgment.

It is proposed that a TCL specific to the emergency class that requires the registrant to practice psychotherapy with clinical supervision be included. This requirement is a safeguard to protect the public and will also provide support to the emergency class registrant as they begin practice.

Expiry of emergency class of registration

The Ministry is requiring that the emergency class certificate must be issued for a minimum period of one year and must be renewable for that length of time as well. The draft regulation includes that the certificate will expire if it is not renewed.

It is proposed that the certificate expires six months after Council determines that the emergency circumstances no longer exist. This six-month period allows the registrant time to transfer to another class or to close their practice and refer clients to another practitioner.

Transition from emergency class of registration to another class

The Ministry is requiring colleges to specify emergency class registrants transferring to another class of registration. It is proposed that emergency class registrants transfer to the RP (Qualifying) class. This would mean the registrant would be required to continue practicing with clinical supervision until they meet the requirements to transfer to RP and obtain independent practice. In the RP (Qualifying) category, they would be required to pass the Registration Exam and submit documentation to support 450 direct client contact and 100 clinical supervision hours to transfer to RP. Requiring emergency class registrants to transfer to RP (Qualifying) rather than directly to RP ensures the normal safeguards are in place and met prior to independent practice. The transfer to RP (Qualifying) will not require a full application through the regular route or completion of the mapping tool. Making the requirements to transfer to another class too restrictive would impact continuity of care for clients.

It is proposed that in order to transfer to RP (Qualifying) the registrant must currently hold or have held an emergency class certificate within the last six months. This captures that the transfer process is intended for continuity of care and ensures someone can't transfer after they are no longer current in the profession.

Exam Writing Deadlines

It is proposed that the Registration Regulation be revised so that the first exam attempt must be made within the 24-month period following the date on which a Qualifying certificate of registration was issued, and final exam attempt must be made within the five-year period following the date on which a Qualifying certificate of registration was issued.

Making this change will eliminate exam extension requests that are required if there is a delay during the application process (e.g., issue obtaining documents, referral to a panel of the Registration Committee) or if the applicant is approved with a conditional approval (e.g., complete four courses prior to a certificate being issued). This change will also be more fair to registrants in that they all will have a full 24 months in the RP (Qualifying) category to make an exam attempt.

Completed Program

It is proposed that the words "successfully completed" be added to the provision for the combination of education and training option to clarify that an applicant must have at least one successfully completed program in psychotherapy. "Successfully completed a program" is already

included in the other options to demonstrate meeting the education requirement and making this change to the Registration Regulation will ensure alignment with the Registration Committee's interpretation and [Program Definition Policy](#).

Feedback:

We invite your feedback on the proposed amendments to the Registration Regulation. Feedback received will be considered by Council before the amendments are submitted to the Ministry of Health.

You may submit your feedback via email to info@crpo.ca or using the [online survey](#).

All feedback will be published as part of the process of bringing the draft regulation for final approval by the Council. Submissions received from individuals will be published anonymously, while feedback from organizations will be published to include the name of the organization.

Registrants and stakeholders have until **Friday, March 31, 2023** to provide feedback.

APPENDIX A

Amendments to Ontario Regulation 67/15: Registration **DRAFT 0.1**

Section 2 is removed and replaced with the following:

2. The following are prescribed as classes of certificates of registration:

1. Registered Psychotherapist.
2. Qualifying.
3. Temporary.
4. Inactive.
5. Emergency.

Section 5, paragraph 2 is amended adding as sub-paragraph v.

v. A member who holds an Emergency certificate of registration may only use one or more of the titles “Registered Psychotherapist (Emergency Class)” or “Psychothérapeute autorisé (catégorie d’urgence)”, and may only use the abbreviation “RP (Emergency Class)” for the English title and “PA (catégorie d’urgence)” for the French title.

Subsection 6(1), paragraph 1, sub-paragraph iv is removed and replaced with the following:

iv. have such other education and training, which must include one or more **successfully completed** programs in psychotherapy, together with any further education or training, or combination of education and training, that when taken together evidences, in the opinion of the Registration Committee, successful completion of a program that is substantially equivalent to a program referred to in subparagraph i or ii.

Subsections 6(4)(a) and (b) are removed and replaced with the following:

(a) sits his or her first attempt at the examinations within the 24-month period following the date on which **a Qualifying certificate of registration was issued** unless a panel of the Examination Committee is satisfied that exceptional circumstances prevented the applicant from taking the registration examination within this period;

(b) sits his or her final attempt at the examinations within the five-year period following the date on which **a Qualifying certificate of registration was issued** unless a panel of the Examination Committee is satisfied that exceptional circumstances prevented the applicant from taking the registration examinations within this period; and

The following sections are added:

Emergency Certificates of Registration

29. The following are additional requirements for the issuance of a certificate of registration in the emergency class:

- (1) The Council of the College has determined that there are emergency circumstances such that it is in the public interest to issue certificates of registration in the emergency class. In making this determination, the Council may take into account all of the relevant circumstances including the presence of a significant interruption in the processing of applications for registration for other classes such that there is a lengthy delay in their

being registered and any requests by the Minister to initiate registrations under the emergency class.

(2) The applicant must have been registered or licensed to practise psychotherapy in another jurisdiction in which the requirements for registration or licensure are similar to those in paragraphs 1, 2 and 3 of subsection 6 (1).

(3) The applicant must have completed, no earlier than two years before the date of his or her application, the jurisprudence course that was set or approved by the Registration Committee.

30. The requirements of section 29 are non-exemptible.

31. An additional requirement for the issuance of a certificate of registration in the emergency class is that within the three years prior to submitting their application for registration, the applicant has practised the profession.

32. Every certificate of registration in the emergency class is subject to the following terms, conditions and limitations:

1. The member must practise psychotherapy with clinical supervision.

Emergency Class, Expiry

33. (1) Unless stated otherwise on the certificate, a certificate of registration in the emergency class expires one year after it is issued unless it is renewed.

(2) Unless stated otherwise on the certificate, a renewed certificate of registration in the emergency class expires one year after it is issued unless it is renewed again.

(3) Despite subsections (1) and (2), a certificate of registration in the emergency class expires six months after the date the Council of the College determines that emergency circumstances no longer exist even where the certificate would otherwise expire before or after that time.

Moving from Emergency to Qualifying Certificate

34. A member who holds, or held within the previous six months, a certificate of registration in the emergency class may be issued a certificate of registration in the Qualifying class [*general/independent*] despite not having met the requirements set out in section 10, if the member applies for a certificate of registration in the Qualifying class.

Summation Report: CRPO Survey on Proposed Regulation of an “Emergency Class” of Registrants

Summary

- The College received 108 responses submitted through the CRPO website.
- No submissions were received through Ontario’s Regulatory Registry.
- The College also received a general submission from Competition Bureau Canada detailing support for “pro-competition” policies.
 - The submission has not been included in the statistical measures below, as it appears to be a general submission sent to all impacted regulatory colleges and does not comment on the specifics of the College’s proposed regulation.
 - The submission can be read in Appendix C.
- The majority of respondents (83.3%) were CRPO registrants.
- Overall, 61.1% of total respondents and 63.3% of CRPO registrants “agreed” or “strongly agreed” with the regulation as drafted.
- 24.1% of total respondents and 23.3% of CRPO registrants “disagreed” or “strongly disagreed” with the regulation as presented. Those who disagreed with the regulation generally cited two primary concerns:
 - A) Expediting registration could threaten public safety and the integrity of services provided;
 - B) The mental health crisis is being mischaracterized as a lack of available professionals, when the issue primarily lays in the accessibility of said professionals.
 - As noted by respondents, primary barriers to care in the mental health space are rooted in accessibility. Noted concerns include lack of OHIP coverage for RP services, as well as the application of HST of RPs which results in clients having to pay 13% more for their services.
 - As a result, many respondents did not feel that an “emergency registration” class would improve the public’s ability to access services.

Data Integrity

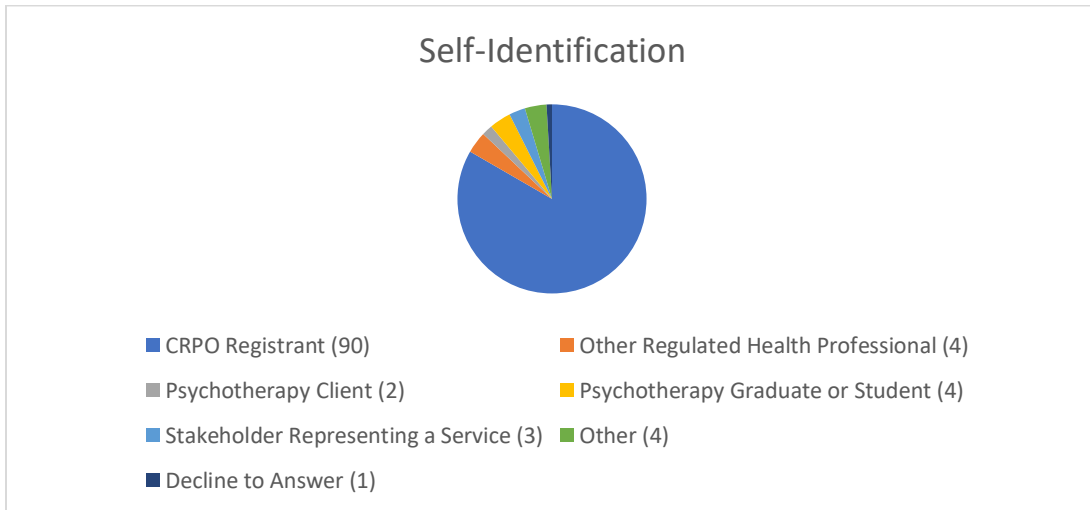
- There were three IP addresses who had two or more submissions to the public consultation. In each case, the subsequent submissions were received shortly after the original.
 - These responses have not been removed as they may have been a case of coworkers or members of the same household using a single device to submit a response.
- Several respondents provided commentary that fell outside the scope of this consultation.

- Although the feedback may not be relevant to this consultation, all responses have been included in the data sets and can be reviewed in Appendix A as there is no way to determine whether the out-of-scope concerns impacted the respondent’s perception of the regulation or whether the respondent is merely utilizing an opportunity to communicate directly with the College.

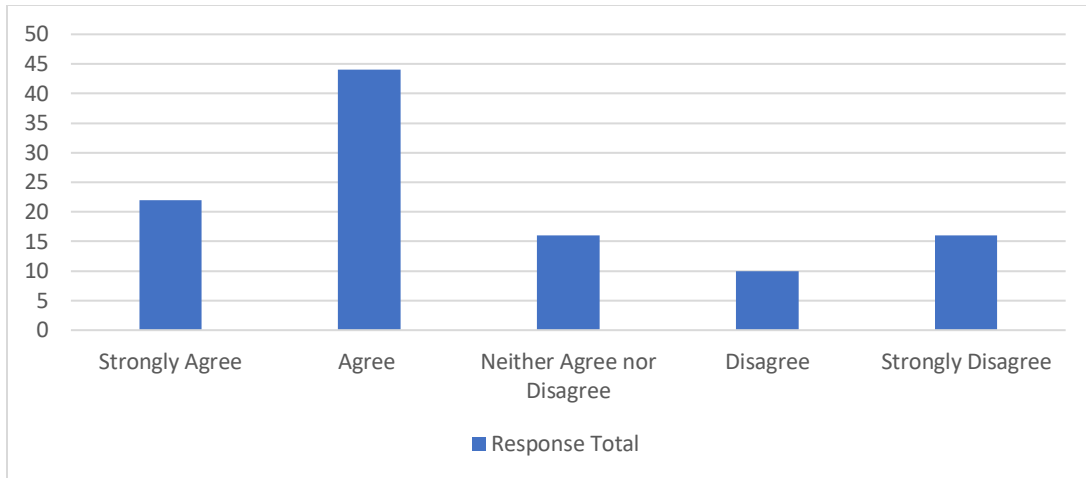
Findings and Analysis

Population Sample

- CRPO received 108 responses to the online survey. One response was submitted in French.
- The majority of respondents (83.3%) were CRPO registrants.
- The second most represented groups were other regulated health care professionals (3.7%), psychotherapy program students or graduates (3.7%), and “other” (3.7%).



Survey Responses



- Overall, 61.1% of total respondents (66) agreed or strongly agreed with the regulation as drafted.
 - There were no strong consistent themes among the comments provided for those who “agreed” or “strongly agreed.”
- 14.8% of respondents (16) reported “neither agree nor disagree” with the regulation as drafted.
 - The majority of concerns raised in the comments focused on topics outside of scope of this consultation, including feedback on the RP (Qualifying) Class and barriers the public face when trying to access mental health resources.
- 24.1% of respondents (26) “disagreed” or “strongly disagreed” with the regulation as presented.
 - Of those who “disagreed” or “strongly disagreed” and provided written comments (19 total), 47.4% (9) objected on the basis of perceived risks to the public due to weakened barriers to enter the profession.
 - Of those who “disagreed” or “strongly disagreed” and provided written comments (19), 31.6% (6) expressed concerns that the mental health crisis was being mischaracterized as a lack of available professionals or identified concerns about accessibility of qualified professionals.

Key Takeaways

- The majority of respondents agree with the regulation as drafted, and those that did not agree frequently identified concerns that fall outside of CRPO’s mandate.
- There is generalized concern that an “Emergency Class” offers short cuts and as a result will result in less competent professionals who may threaten public safety.
- As currently drafted, the regulation offers an additional pathway for registration that effectively balances public protection with the unique circumstances that may require a rapid and substantial influx of mental health professionals.

Recommendations

- After a thorough review of the feedback provided to the College, no changes to the regulation are suggested at this time.
- The College should consider devising a communications strategy to address the concerns identified by respondents and better explain how the regulation maintains entry to practice standards, and contributes to public safety rather than diminishing it.
- CRPO’s Council may wish to consider passing a resolution or policy that identifies the circumstances or guiding principles that would be used to determine the declaration of an emergency that would invoke the opening of the Emergency Class to provide additional clarity.

Appendix A – Survey Response Data

Identification	Response	Comments
CRPO Registrant	Strongly agree	
CRPO Registrant	Strongly agree	Internationally trained professionals can offer quality and valuable mental health care to help alleviate the burden of client volume on already registered psychotherapists. I welcome and appreciate the proposed amendments.
CRPO Registrant	Strongly agree	
CRPO Registrant	Strongly agree	
CRPO Registrant	Strongly agree	It took the CRPO months to approve my application. I feel very strongly that those should not count as the 24 month period before my first registration exam, since I couldn't start my career until you approved the application. I would also add that I don't see the point in even having the first exam need to be taken within the first 24 months. Why not have to have everything completed within the first 5 years? This first exam I am being forced to take before completing my hours is just an exercise that my governing body is making me jump through. I do not feel ready, as I am trying to build a career after hustling my way through school. I think this adds undue stress to new practitioners starting their careers, and undue stress onto the CRPO who has to mark a bunch of redundant exams (much of them, I'm sure, were only taken because they were forced, not necessarily because the practitioners were ready). This leads to many probably having to retake them, which means more marking for the CRPO (which costs all of us time and money). Why not allow the practitioners to choose when they are ready within the 5 years? This governing body asks a lot of its members and does very, very little in return, including taking a very long time to approve applications, respond, and makes it very difficult to register hours. Every interaction with the CRPO is absolutely excruciating.
Stakeholder representing a service providing organization	Strongly agree	It is critical that we increase the number of qualified psychotherapists available to meet the increasing demands. I currently work in the field of pain, addiction and mental health wellness and will consider becoming an RP because of the proposed changes.
CRPO Registrant	Strongly agree	
Member of another regulated health profession	Strongly agree	
Other (please specify affiliation)	Strongly agree	
CRPO Registrant	Strongly agree	I feel instead of using word "emergency", one can use "alternate" or "special" class.
CRPO Registrant	Strongly agree	

CRPO Registrant	Strongly agree	Re: emergency class, agree that applicants do NOT need to complete the mapping tool, but do need supervision from an RP (Ontario) if they are from/ required to be from another jurisdiction ; Agree with the proposed time lines for exams to eliminate extension requests (saves a lot of time!)
Member of another regulated health profession	Strongly agree	
Psychotherapy graduate or student	Strongly agree	If support is needed, ideally participants pushing through an accredited school should be able to support this initiative (vs hold them back).
CRPO Registrant	Strongly agree	I have read through the proposed changes and everything seems reasonable to me. I appreciate the balance of public protection and flexibility, as well as consideration of how long certain tasks take.
CRPO Registrant	Strongly agree	
Other (please specify affiliation)	Strongly agree	I am a qualified clinician from France and a person of colour who sees and hears all the time of persons seeking competent clinicians and possibly someone of colour to whom they may speak. I am currently working as a French teacher all the while trying to get a sabbatical so that I may fulfil the requirements of the CRPO. I missed being grandfathered in to the CRPO because I was busy working as an elementary school teacher. I have completed the Program for the Internationally-Trained Psychologists here in Toronto.
CRPO Registrant	Strongly agree	
CRPO Registrant	Strongly agree	
CRPO Registrant	Strongly agree	
CRPO Registrant	Strongly agree	
CRPO Registrant (FR)	Strongly agree	any psychotherapist in good standing in another jurisdiction is as competent as those in Ontario and therefore could participate in the emergency when necessary; this will remove barriers for clients whose language and customs require these psychotherapists from other jurisdictions. it will not be in competition with Ontario psychotherapists since each of us has our own characteristics. It will be up to the customers to choose. *NOTE: This submission was originally received in French and has been translated.
CRPO Registrant	Agree	Mental Health is a priority in Canada, so any extra support to get more people having access to it is relevant.
CRPO Registrant	Agree	The information presented outlines a reasonably fair and ethical process to emergency increase of human resource needs within the province, with a primary goal of public protection clearly evident. Thanks, the increase in qualified practitioners is desperately needed.
CRPO Registrant	Agree	
CRPO Registrant	Agree	I agree with the changes the CRPO are suggesting. Would it be beneficial to add that currently registered RP's should be notified of the emergency and offered the opportunity to fill said roles before moving forward with registering those who may not be fully ready yet?
CRPO Registrant	Agree	While I appreciate that the legislation has primarily been opened at the behest of the provincial government to amend the legislation to include the emergency class registration, there are other equally if not more important amendments to be made to the Registration Regulation, in the public interest. The Registration Regulation currently allows a person to register with the college and practice the profession (under supervision) without ever having any clinical experience. The only requirements are that the person has completed the required 360 hours of didactic coursework and written the Jurisprudence e-learning module. Unfortunately, the private training schools lobbied the transitional council vigorously to not require clinical experience to register with the College and there was no appetite for a student class of registrant. The transitional council was working to balance the public interest with a mandate from government to consider impact on the private training schools, many of whom did not have the means to provide onsite or externship practice placements for students. The argument was that it would not be in the public interest to lose these training programs, and that the playing field needed to be leveled with larger institutions like universities. What the transitional council was not able to foresee is the way this omission in the legislation would begin to shape how programs of study are offered. Moreover, that institutions such as [redacted] would take advantage of this omission in order to create a money-making diploma mill graduating hundreds of students a year who only have the 360 hours of didactic learning. Many of these graduates are unable to find placements and many if not most are not remotely ready to begin seeing clients, have inadequate supervision and do not do well on the national examination. There is a growing negative and country wide reputation that [redacted] grads are substandard and pose a risk to the public interest. Additionally other institutions see a money making opportunity by capitalizing on the high demand for mental health degrees and show interest in pursuing similar [redacted] style

		<p>programs. Universities are facing increasing financial crunches and looking for ways to cut costs and increase revenues. I know of two universities who have eagerly looked at this “loophole” has a money-making endeavor. The separation of didactic teaching from clinical experience is dangerous, as it removes or severely mitigates the importance and value of integrated practice. Integrated practice requires the integration of theory into practice as the theory is being learned. Moreover, integrated practice requires an integration of clinical competence with clinical experience. Competencies cannot be taught or learned in a clinical experience vacuum. Competency development requires clinical practice. Finally, attention to the safe and effective use of self cannot be properly learned or assessed theoretically (in didactic learning alone). Students require clinical experience to better understand that interface between the personal and the professional. The continued absence of a requirement for some level of integration of theory into practice or clinical experience before becoming registered will grow exponentially as a risk to the public if left unchecked. I implore the college to take legislative and non-legislative action to address this concern before it gets more out of hand. A person should not be allowed to register as an RP(Qualifying) without having a minimum of 200 hours of supervised direct client contact. Programs should be required to ensure and demonstrate how students integrate theory into practice in real world (not role play or case study) settings. No registrant should ever be allowed to take a first attempt on the national exam without significant clinical practice. In fact, I would argue, that the step to become an RP (or perhaps independent practice) is to first accumulate 450 supervised DCC and then write the first attempt of the exam. Finally, were the College to open the legislation it should also create a “supervisor” class of registrant and strengthen the requirements to become a clinical supervisor, particularly to those who are entering the profession.</p> <p>*NOTE: This submission was edited to redact the name of an institution identified by the respondent. No other changes to the submission have been made.</p>
CRPO Registrant	Agree	
CRPO Registrant	Agree	
CRPO Registrant	Agree	Good Effort
CRPO Registrant	Agree	
CRPO Registrant	Agree	I think that the emergency designation would be a great addition. That said, I think that a class similar to this one in that it doesn't require Canadian experience should be available to people immigrating to Canada who have the education and experience in their own country to be able to do the work here. Bridging is so difficult. Make it easier for us to have more qualified professionals.
CRPO Registrant	Agree	
CRPO Registrant	Agree	
CRPO Registrant	Agree	
CRPO Registrant	Agree	This seems a fair way to onboard extra therapists in a crisis.
CRPO Registrant	Agree	
CRPO Registrant	Agree	
CRPO Registrant	Agree	
CRPO Registrant	Agree	While I think that bridging qualified, foreign trained, mental health professionals into the CRPO system is critical and would add a more rich and diverse profession to draw from, appropriate bridging programs and knowledge transfer/exchange opportunities should be explored. I also think that those coming to assist from more developed/privileged countries could be hired more specifically to cooperatively develop and support Canada's growing mental system. Temporary and immediate support from more established professions could potentially translate to developing a more robust system and new generation of Canadian mental health leaders.
CRPO Registrant	Agree	
CRPO Registrant	Agree	
CRPO Registrant	Agree	
Psychotherapy graduate or student	Agree	
CRPO Registrant	Agree	my only concern is the continuation of treatment of client's utilizing this type of emergency RP. It would appear that you have this covered with the time allotment to write exams.
Psychotherapy graduate or student	Agree	
CRPO Registrant	Agree	

CRPO Registrant	Agree	While the proposed regulations establish grounds for accelerating the number of therapists available to help the public, there is nothing in the suggested provisions to increase the number of available supervisors to take on the proposed increase in RP (Qualifying). Furthermore, the provisions for Supervisors currently requires 1,000 hours of practice, educational component and a minimum of 5 years of practice. I submit that perhaps the minimum of 5 years of practice may need to reduced to enable more supervisors to oversee the influx of RP (Qualifying) candidates.
CRPO Registrant	Agree	I believe the amendments to the Registration Regulation are all useful to the entry of qualified practitioners entering the field during times of public crises. However, my only concern was that registrants would be exempt from providing CRPO with a mapping tool. When completing this tool, a registrant provides descriptions of the courses they took and a deeper understanding of course objectives. I recall while filling out the mapping tool, that I was encouraged to think more in-depth about how each course applied to the competencies of being a psychotherapist. The mapping tool was the second longest part of the application process and for good reason. I believe it's an important step and a safeguard that could be neglected. Perhaps registrants could provide these course descriptions after their registration has been completed, but absolutely not be exempt from them altogether. It could be an important indicator of what areas of education were missed in their programs.
CRPO Registrant	Agree	
CRPO Registrant	Agree	Thank you for all the hard work you all do in making our regulatory board an effective and useful agency for both the public members as well as for registrants. The challenges that you are faced with in managing multiple voices and offering nimble services and programs is quite astonishing. Changes like these need to be made in uncertain times and thoughtful and inquisitive people like yourselves make this possible. Without such a dedication and efforts, the strength of our profession would be weakened and quickly tested for integrity. Thank you from the bottom of my heart and the spirit of our industry to maintain such a rigorous world of regulations and professionalism!
CRPO Registrant	Agree	
CRPO Registrant	Agree	
CRPO Registrant	Agree	
Psychotherapy graduate or student	Agree	N/A
CRPO Registrant	Agree	
CRPO Registrant	Agree	I welcome the proposed changes. Please find my feedback/recommendations hereunder: - Using the words "Emergency Class" might give clients the idea that this therapist only deals with crisis. If an applicant is meeting this criteria: "This requirement ensures the applicant has training and experience in the profession and that they have undergone an application review in another jurisdiction. The requirements in the other jurisdiction need to be similar but not identical to CRPO's requirements, which allows for flexibility" and the applicant has completed the jurisprudence course, then I do not see why the applicant cannot register directly as "Qualifying". - I propose that if an applicant under the "Emergency Class" meets the required number of DCC and Supervision hours then upon successfully completing the exams, they can transfer to the RP category instead of the "Qualifying" category. - Strongly agree with the removal of the education mapping tool which is time consuming especially given that the applicant has not only completed a program but also been reviewed in another jurisdiction. - Strongly support that the 24 months for completion of the exams should start from the date of registration instead of completion. I wonder if the 24 months could be extended as some of my interns have expressed that their friends and them wish to complete more education/training before attempting the exams. Thank you for reading and considering my feedback!
CRPO Registrant	Agree	
CRPO Registrant	Agree	Essential to have a Masters Preparation
CRPO Registrant	Agree	.
CRPO Registrant	Agree	Clarifying questions: - What kind of supervision do RP (Emergency class) need? (i.e., only from RPs or okay to get supervision from social workers?) How often (i.e., 1 hour for every 5 hours DCC?) - any minimum hours for criteria of practicing psychotherapy in last 3 years? Will you ask for proof? - Are jurisdictions of practice outside of Canada considered? I appreciate how there is room for growth for emergency status clinicians in that they can become qualifying members of the college.
CRPO Registrant	Agree	
CRPO Registrant	Agree	Appears to be all very logical amendments.
CRPO Registrant	Agree	Clearer explanation or example of when this would be done and expectations of current registrants.
CRPO Registrant	Agree	I think that the removal of Canadian Experience should be more than just under emergency circumstances, there surely must be other ways of assessing that someone is properly trained and

		understand the necessary legal and cultural requirements to practice in Ontario that don't risk discrimination, as does the Canadian Experience requirement
Member of another regulated health profession	Neither agree nor disagree	The first two changes seem appropriate, however the third regarding the the completed program does not seem to address the issue of student therapists presenting themselves as fully trained Registered Psychotherapists (Qualifying) to the public despite not having completed their program. They continue to open practice and present themselves as clinicians before completing their practicum hours and this is misleading and has been negatively impacting the perception around Registered Psychotherapists (Qualifying) since the change was made to allow them to register after their coursework component was done. Apologies if I'm misunderstanding and this isn't the change that has been discussed to address the above.
CRPO Registrant	Neither agree nor disagree	Strongly agree with masters requirement, as it is a common criticism the psychotherapy/counselling profession, that not all have a masters degree, and this detracts from the credibility of the profession. I don't know that Bill 106 needs to cover psychotherapy/counselling? I think maybe just more physicians and nurses are needed in an emergency, such as given caps on medical school spots in Canada and that many physicians and nurses are choosing to leave the jurisdiction and/or country and/or profession. The change to the exam timing seems reasonable. Thank you for inviting feedback.
CRPO Registrant	Neither agree nor disagree	In theory I can understand the need for a provision like this. However, I have a 2 major concerns with this approach as it doesn't seem to address the actual issues. 1) To me there was a bottle-neck during the pandemic that prevented many new grads from taking their exam. From where I am sitting the problem exists in the way grads can take their exam during an emergency situation, rather than creating this provision. If the provision allows for exams to be taken in a different way, then perhaps that would be useful. 2) Post-pandemic we are seeing a saturation of the market in private practitioners for 2 reasons. 1) Many in health care are leaving due to the unsafe work conditions set up by the provincial government. No personal control means worsening mental health, a private practice allows individuals to have more control; and 2) During lockdowns people went back to school to upgrade skills and now we have an influx of new grads. I am assuming this provision is set out to get the public access to more mental health care in an emergency situation. Unfortunately, this provision doesn't remove the barriers that allow the public more access to RPs. For the public, there are not enough places to obtain good mental health care, and they can't necessarily afford private practice (good care). Apps are not a solution for mental health problems. For the RPs, the government needs to find mechanisms to take care of employees in public health care (there is so much research on how to support this). This is more cost-effective than absenteeism and turnover. If the government would address this issue they could retain employees. To me these are the problems, not an emergency provision that does nothing but saturate the market further and leaves a barrier between the public and their mental health care.
CRPO Registrant	Neither agree nor disagree	
CRPO Registrant	Neither agree nor disagree	
	Neither agree nor disagree	
Other (please specify affiliation)	Neither agree nor disagree	I am not convinced the proposed emergency changes will both provide increased access and protect public and practitioners . Time Limits are too long to constitute emergency, And no I for given on integrity of test taking, specifically about proctoring. How is it determined the person taking the exam is the person registering? Too Many details are left out for me to give an informed decision at this time. I agree we need increased access. More details need to be specified about how to do that safety for vulnerable people.
CRPO Registrant	Neither agree nor disagree	
Other (please specify affiliation)	Neither agree nor disagree	Registered Psychotherapists since 2015 have paid HST. This needs to be removed firstly. We are regulated health care professionals and no other Regulated Health Care Professionals are required to pay this tax.
CRPO Registrant	Neither agree nor disagree	Overall, I agree with the changes to the regulation and introduction of the Emergency Class registration. I am also in agreement with the exam writing deadlines and believe it is reasonable that a first attempt should be made within two years of registration. My main concern is around education requirements and the wording around "successfully completed". I am of the belief that registrants should have completed their graduate degree in entirety before entering into the RP (Qualifying) class. However, the wording as specified in the following section: "Note: The Registration Regulation allows an applicant to apply and register in the Qualifying class once they have substantially completed their education and training if they are actively pursuing the completion of the training. The proposed amendment to the

		Registration Regulation will not impact this." is concerning. First, it is unclear what is meant by "substantially completed" their training. Does this mean students could apply for RP (qualifying) status before even initiating their practicum? I believe this situation is putting the public at unnecessary risk, as recently we have encountered situations where students who have not initiated practicum are opening a private practice or applying for clinical jobs using their RP (qualifying) designation, without having encountered any clinical experience in the past. Furthermore, there have been other situations where students in practicum have started private practices on the side but have not informed the practicum site, and are not seeking supervision for the work they are doing in their private practice. In other words, they may be under supervision in practicum and not under any form of supervision in their private practice, which I believe places the public in unnecessary risk. I strongly feel that in order to become registered as RP (qualifying), you should have finished the entirety of your educational program. I believe this would increase the credibility and relevance of the RP (qualifying) designation, as it would only be conferred after completing the necessary education and minimize the possibility of students initiating their own (often times unsupervised) private practices without having completed the practicum component, which is arguably the most fundamental aspects of their schooling. I would like to see this made more clear that programs should be completed in their entirety prior to having the RP (Qualifying) designation conferred. Perhaps it could be updated that students can apply during practicum, but the designation would not actually be conferred until proof of graduation is submitted? I feel this would be a much more reasonable approach that protects the public effectively.
CRPO Registrant	Neither agree nor disagree	While the Emergency RP designation may help to alleviate the currently immense demand for psychotherapy in Ontario, I am not convinced that more psychotherapists would help to alleviate the impact of the emergency situation induced by the COVID-19 pandemic. While I am uncertain if this is something within the CRPO's power to suggest, it is likely that the detrimental impact of the current mental health crisis could be reasonably quelled if Ontario were to add psychotherapy to the list of OHIP-funded services, and allow registered professionals other than MDs and psychiatrists (such as RPs) to bill OHIP for said services. I am ultimately indifferent to the CRPO's attempts to create a new class of RPs to help stymie the negative mental health impacts of the pandemic, as I believe that this will not allow the citizens of Ontario any greater access to quality mental health services. Ultimately, having more practitioners will do little to assist in citizens' ability to access these services, as psychotherapeutic services remain largely unaffordable to those who need it most. However, if RPs, psychologists and other capable registered professionals are granted the authority to bill OHIP for what only psychiatrists are currently permitted to provide, the mental health situation in the province would almost certainly improve dramatically. Thank you for taking the time to read and consider my feedback - I hope that my words, as a mental health practitioner, carry some influence as the CRPO decides how to best handle the untenable mental health crisis in Ontario.
CRPO Registrant	Neither agree nor disagree	The changes need to be permanent. If acceptable for an emergency, they are acceptable for all applications.
CRPO Registrant	Neither agree nor disagree	While I agree with the intent, I am deeply concerned about emergency situations being times when atypical registration is implemented as these are times when people can be at their most vulnerable and therefore, most likely to be misled. Given that there is an underbelly within helping professions of people who seek to exploit their positions, I feel that emergencies are exactly when we must be most vigilant about applying standards.
CRPO Registrant	Neither agree nor disagree	They sound reasonable and we'll thought out with both public safety and practicality in mind
CRPO Registrant	Neither agree nor disagree	
CRPO Registrant	Neither agree nor disagree	
Member of another regulated health profession	Disagree	I want to start with saying thank you for your attempt at making registration easier. I have a very specific viewpoint related to registration and the impact on insurance companies. My experience has been that 3 of the bigger insurance companies do not process claims unless the practitioner is a RP. This leaves a large gap in services for individuals and adds to the need for an "emergency class". I would be happy to register with 2 different colleges and pay the fees but the process for registering for an RP is difficult and requirements repetitive. I have read the "emergency class" proposal and it remains complicated and redundant specifically for the other professions who are qualified to practice psychotherapy (social workers, nurses, occupational therapists and physicians). The only significant change I see is not needing to do the mapping. The government has dictated that CRPO be the lead related to psychotherapy so I feel the responsibility falls to the CRPO to collaborate and merge the regulatory bodies to be effective for

		<p>the public, not restrictive. My proposal is 1) CRPO collaborate with the Ontario regulatory colleges whose registrants can practice so CRPO is better able to understand the education provided to their registrants. An example is the Professional Practice Jurisprudence Registered Psychotherapists document that discusses and is in alignment with what the nursing profession regulates, and the universities teach. This is basic health care provider information and completing a nursing program would educate you on most of the content. Completing the program would most certainly prepare you for research and continuing education, which would be needed to specialize in psychotherapy. 2) Take work experience such as mental health nurse, psychiatric nursing ect into consideration within the nursing profession. 3) Add the regulatory colleges allowed to practice psychotherapy and their programs to your current approved program list and add other certificate programs as necessary. 4) Continue with supervisory hours for independent practice.</p>
CRPO Registrant	Disagree	<p>Overall, I do not understand the rationale for the proposed changes and for the inclusion of this new registration class. Insofar as I can tell from the document outlining the proposed changes, the changes will only apply to those who are already regulated under a different province or territory, and have been working within the field within the past three years. This means that within Canada, only psychotherapists currently registered in Nova Scotia, New Brunswick, PEI, and Quebec who have been working within the past three years are eligible for registration under the RP (Emergency Class). It is unclear whether psychotherapists in Alberta will be included. From my understanding of the legislation in Ontario as well as the other provinces, many if not all of the registrants from the above mentioned provinces can already take on a small number of Ontario clients. Why would a psychotherapist who is already regulated in their own province also register in Ontario? There does not seem to be an incentive or rationale to do this, as the labour mobility mentioned in the document already seems to exist. Can it reasonably be expected that a member of another College would voluntarily register with the CRPO if they're already able to take on a small number of Ontario clients? Are there repercussions for those found to be working with Ontario clients without maintaining dual registration in their home province and Ontario? Is the RP (Emergency Class) designed to encourage providers in other provinces to move to Ontario temporarily to work exclusively with Ontario clients? If so, why? Additionally, the new RP (Emergency Class) would be required to practice with supervision in the interest of public safety, but there does not appear to be a similar process for increasing the number of qualified supervisors. How are RP (Emergency Class) registrants supposed to access recognized supervision? Would they be required to have an Ontario supervisor, or would an out of province supervisor be recognized? Speaking from personal experience, it can already be difficult for Ontario registrants to access adequate supervision as waitlists for supervisors are long. Is there a plan to allow for an emergency class of supervisors or similar to account for this increased need? I am also curious why the proposed registration changes only seem to apply to current (within the past three years) psychotherapists or providers. There do not seem to be any changes to registration requirements for new psychotherapists entering the field, despite an increase in the number of applications over the past few years. For instance, in 2020 the CRPO reported over 8000 new registrants and a 24% increase in applications. In 2021, the CRPO reported over 9000 new registrants and a 38% increase in applications. Only 3% of those 2021 registrants were reported as out of province. What is the rationale for decreasing barriers to entry for out of province current therapists, but not for new registrants? Particularly those already within the province, who would have a greater understanding of various resources, community supports, health care regulations, etc in Ontario. If the rationale for changes is to allow for an emergency class of supervised, qualified psychotherapists, why pour resources into out of province applications instead of into support for new applicants and registrants? Does this not pull labour resources from within the CRPO from processing in province applications and answering questions/getting support to applicants or registrants who will be working in Ontario longterm? Finally, the proposed changes don't seem to address therapists/counsellors in unregulated provinces who are already working with clients within Ontario. Perhaps this is outside of the scope of these particular proposed changes, but it seems worth noting nevertheless. Overall, these proposed changes leave me with more questions than answers. The changes seem well intended, but to my eyes don't accurately reflect the true need or provide solutions to ongoing issues within the field, particularly for emergency situations like the COVID-19 pandemic.</p>
CRPO Registrant	Disagree	<p>Ontario has a large volume of registered psychotherapists, both qualifying and fully qualified. I see no reason to create an emergency category for this field of work. Removing barriers so the public can access these services should be the priority. For example - removing the HST on psychotherapy provided by a CRPO registrant would go a long way to making our services more accessible. I also believe that creating an emergency category poses potential risks to the general public who may not be aware of the rigorous process of becoming a full registrant of CRPO thereby decreasing the general publics' risk of harm from</p>

		lesser qualified individuals. If such a category is created, there should be more stringent requirements for supervision within the first few months of registration in this category.
CRPO Registrant	Disagree	My humble thought is this: I would want to ensure we are not compromising on the quality of psychological care. The foundations of the undergraduate degree be in psychology. Master's also in Psychology to ensure that the therapist is well versed in psychotherapeutic techniques with hands on experience.
CRPO Registrant	Disagree	There should continue to require a minimum proficiency in either of Canada's official languages.
CRPO Registrant	Disagree	Educational requirement should be acceptable at the HBA level (Psychology) as an HBSW is acceptable through the OCSWSSW to practice psychotherapy
CRPO Registrant	Disagree	I believe an emergency class will only dilute the requirements to become a RP.
CRPO Registrant	Disagree	While the need to expedite health care services in emergency situations is important, it should not be at the detriment of regulated care. Allowing people to offer therapeutic services before having completed all CRPO requirements feels negligent and potentially dangerous. Yes, people would be receiving care faster but my concern is around the quality of care they be would receiving.
CRPO Registrant	Disagree	Concerned that in a state of emergency ill equipped individuals will be moved as a registered psychotherapist which will cause harm to the profession and individuals of the public. For members of the public it could cause greater difficulty during an emergency which may prevent them from seeking therapy in the future. Concerned the information submitted to be approved my CRPO will never be reviewed due to the large amount of applicants.
CRPO Registrant	Disagree	I agree with some parts and not others. Thanks!
CRPO Registrant	Strongly disagree	Psychotherapy is not "emergency" or crisis services - it is, by definition, longer-term services in order to address "an individual's serious disorder of thought, cognition, mood, emotional regulation, perception or memory that, may seriously impair the individual's judgement, insight, behaviour, communication or social functioning (RHPA 1991)." That simply cannot be done in a provision of emergency or crisis services that by definition are short-term.
Psychotherapy client	Strongly disagree	Having more therapist will not help with the mental health crisis - an increasing in funding to have access to these services will
Stakeholder representing a service providing organization	Strongly disagree	The issue of access to mental health care is not due to a lack of mental health professionals, it's due to a lack of mental health funding and coverage. Further funding needs to be provided to improve financial access to mental health services.
Psychotherapy client	Strongly disagree	
CRPO Registrant	Strongly disagree	We must uphold the standard of therapy the CRPO has set - that means no one can be rushed through the system. The requirements are fair, and all current registrants have gotten through. Especially for an emergency class, the individuals who respond should be highly trained, highly skilled, and not just individuals who have been rushed through. This will be damaging for the client, for psychotherapists in general, and to the college.
CRPO Registrant	Strongly disagree	
CRPO Registrant	Strongly disagree	
CRPO Registrant	Strongly disagree	
CRPO Registrant	Strongly disagree	The Profession of Psychotherapy is already greatly diminished in its' standing as compared to persons of equivalent educational and professional qualifications, for example dentistry. The profession is sadly underpaid compared to that of similar standards. There is absolutely no shortage of professional psychotherapists in Ontario, in fact there is now a plethora of under-qualified persons' offering service as counsellors through third party services. It is difficult for a private practitioner already for overhead. The public information about what a psychotherapist needs to improve as does the coverage by insurance providers through this better understanding. For example Greensield often allows coverage for counselors but not psychotherapists, the Police Commissioner "improved" OPP coverage by only allowing psychotherapists supervised by psychologist but expanding one contract with an EAP. If the standards of language and education for a Registered Psychotherapist are lowered, so will our profession be diminished, the ability to practice by those already and fully earned as RP's and you are making way for more 3rd parties to control the services provided through cheaper, more puppy-milled services of therapists new and willing to accept cheaper rates. It is abhorrent that is what is happening to health care here. The standards of those entering the practice need to be stringent and upheld, not diminishing our standards to meet those of developing countries. There is no real shortage at all. The shortage is in the integrity to maintain the profession at a high standard thereby encouraging better coverage. 8 years (16 academic semesters) of University warrants this. The solution I believe is to implore the province to cover properly registered and insured Registered Psychotherapists.

CRPO Registrant	Strongly disagree	It looks like the emergency class amendments are intended to increase capacity by compromising the quality of care that psychotherapists should provide. It's even more important to maintain that care, as shown by meeting the minimum registration/test/ exam criteria in emergency settings. I think the proposed changes have the potential to harm the public create damage to the regulated profession.
CRPO Registrant	Strongly disagree	I think the notion of an emergency class of registration poses undue risks to the public
CRPO Registrant	Strongly disagree	
Stakeholder representing a service providing organization	Strongly disagree	
CRPO Registrant	Strongly disagree	
CRPO Registrant	Strongly disagree	Given that there are now more and more Canadians who are seeking the RP status (it has become a popular program), I believe that there are many such Canadian RPs who don't yet have a full practice. Yet, they have invested long hours training and large sums of money to educate themselves. I wonder why the government is suggesting the implementation of a new 'Emergency RP' status, if there are many RPs who are still trying to build their practice, and who are not yet being fully utilized. RPs are professionals who, like other professionals, deserve to be compensated fairly. Is the government willing to provide programming that is government sponsored, so that the public can avail themselves of services, yet where the RP is being paid competitively? I am not sure why there is the belief that there are not enough practitioners. My understanding is that there is a lack of psychiatrists who can diagnose and prescribe - this is where there is a real shortage of services. I am confident that there are sufficient nos. of Canadian RPs who would be very pleased to gain more clients so as to consistently fill their roster. Perhaps if the government funded such services with competitive pay to Canadian practitioners (e.g. have it covered by OHIP), then those in need of mental health care services who lack the funds to pay for it privately, would be able to receive care by qualified Canadians. Are other regulatory bodies (eg. social workers, etc.), in addition to the CRPO, considering reducing their requirements to obtain status as a professional practitioner? Does the government intend to utilize these "Emergency status RPs" as a lower paid practitioner, so that Canadian RP practitioners become pressured to lower their fees, or to lose their client base?
CRPO Registrant	Strongly disagree	Ontario is well saturated with psychotherapists. There are already difficulties getting insurance companies on board. Programs are churning out grads at an alarming rate. There is not enough work, we are not paid enough in agencies. We do not need a mechanism to fast track new registrants. We need advocacy from you.

Appendix B – Thematic Coding for Dissenting Respondents

Identification	Response	Comments	Theme		
			Public Safety Risk	Psychotherapy Accessibility/ Crisis Mischaracterization	Other
Note: Responses may be coded under more than one theme.					
Member of another regulated health profession	Disagree	I want to start with saying thank you for your attempt at making registration easier. I have a very specific viewpoint related to registration and the impact on insurance companies. My experience has been that 3 of the bigger insurance companies do not process claims unless the practitioner is a RP. This leaves a large gap in services for individuals and adds to the need for an “emergency class”. I would be happy to register with 2 different colleges and pay the fees but the process for registering for an RP is difficult and requirements repetitive. I have read the “emergency class” proposal and it remains complicated and redundant specifically for the other professions who are qualified to practice psychotherapy (social workers, nurses, occupational therapists and physicians). The only significant change I see is not needing to do the mapping. The government has dictated that CRPO be the lead related to psychotherapy so I feel the responsibility falls to the CRPO to collaborate and merge the regulatory bodies to be effective for the public, not restrictive. My proposal is 1) CRPO collaborate with the Ontario regulatory colleges whose registrants can practice so CRPO is better able to understand the education provided to their registrants. An example is the Professional Practice Jurisprudence Registered Psychotherapists document that discusses and is in alignment with what the nursing profession regulates, and the universities teach. This is basic health care provider			X

information and completing a nursing program would educate you on most of the content. Completing the program would most certainly prepare you for research and continuing education, which would be needed to specialize in psychotherapy. 2) Take work experience such as mental health nurse, psychiatric nursing ect into consideration within the nursing profession. 3) Add the regulatory colleges allowed to practice psychotherapy and their programs to your current approved program list and add other certificate programs as necessary. 4) Continue with supervisory hours for independent practice.

CRPO Registrant

Disagree

Overall, I do not understand the rationale for the proposed changes and for the inclusion of this new registration class. Insofar as I can tell from the document outlining the proposed changes, the changes will only apply to those who are already regulated under a different province or territory, and have been working within the field within the past three years. This means that within Canada, only psychotherapists currently registered in Nova Scotia, New Brunswick, PEI, and Quebec who have been working within the past three years are eligible for registration under the RP (Emergency Class). It is unclear whether psychotherapists in Alberta will be included. From my understanding of the legislation in Ontario as well as the other provinces, many if not all of the registrants from the above mentioned provinces can already take on a small number of Ontario clients. Why would a psychotherapist who is already regulated in their own province also register in Ontario? There does not seem to be an incentive or rationale to do this, as the labour mobility mentioned in the document already seems to exist. Can it reasonably be expected that a member of another College would voluntarily register with the CRPO if they're already able to take on a small number of Ontario clients? Are there repercussions for those found to be working with Ontario clients without maintaining dual registration in their home province and Ontario? Is the RP (Emergency Class) designed to encourage providers in other provinces to move to Ontario temporarily to work exclusively with Ontario clients? If so, why? Additionally, the new RP (Emergency Class) would be required to practice with supervision in the interest of public safety, but there does not appear to be a similar process for increasing the number of qualified supervisors. How are RP (Emergency Class) registrants supposed to access recognized supervision? Would they be required to have an Ontario supervisor, or would an out of province supervisor be recognized? Speaking from personal experience, it can already be difficult for Ontario registrants to access adequate supervision as waitlists for supervisors are long. Is there a plan to allow for an emergency class of supervisors or similar to account for this increased need? I am also curious why the proposed registration changes only seem to apply to current (within the past three years) psychotherapists or providers. There do not seem to be any changes to registration requirements for new psychotherapists entering the field, despite an increase in the number of applications over the past few years. For instance, in 2020 the CRPO reported over 8000 new registrants and a 24% increase in applications. In 2021, the CRPO reported over 9000 new registrants and a 38% increase in applications. Only 3% of those 2021 registrants were reported as out of province. What is the rationale for decreasing barriers to entry for out of province current therapists, but not for new registrants? Particularly those already within the province, who would have a greater understanding of various resources, community supports, health care regulations, etc in Ontario. If the rationale for changes is to allow for an emergency class of supervised, qualified psychotherapists, why pour resources into out of province applications instead of into support for new applicants and registrants? Does this not pull labour resources from within the CRPO from processing

X

		<p>in province applications and answering questions/getting support to applicants or registrants who will be working in Ontario longterm? Finally, the proposed changes don't seem to address therapists/counsellors in unregulated provinces who are already working with clients within Ontario. Perhaps this is outside of the scope of these particular proposed changes, but it seems worth noting nevertheless. Overall, these proposed changes leave me with more questions than answers. The changes seem well intended, but to my eyes don't accurately reflect the true need or provide solutions to ongoing issues within the field, particularly for emergency situations like the COVID-19 pandemic.</p>			
CRPO Registrant	Disagree	<p>Ontario has a large volume of registered psychotherapists, both qualifying and fully qualified. I see no reason to create an emergency category for this field of work. Removing barriers so the public can access these services should be the priority. For example - removing the HST on psychotherapy provided by a CRPO registrant would go a long way to making our services more accessible. I also believe that creating an emergency category poses potential risks to the general public who may not be aware of the rigorous process of becoming a full registrant of CRPO thereby decreasing the general public's risk of harm from lesser qualified individuals. If such a category is created, there should be more stringent requirements for supervision within the first few months of registration in this category.</p>	X	X	
CRPO Registrant	Disagree	<p>My humble thought is this: I would want to ensure we are not compromising on the quality of psychological care. The foundations of the undergraduate degree be in psychology. Master's also in Psychology to ensure that the therapist is well versed in psychotherapeutic techniques with hands on experience.</p>	X		
CRPO Registrant	Disagree	<p>There should continue to require a minimum proficiency in either of Canada's official languages.</p>			X
CRPO Registrant	Disagree	<p>Educational requirement should be acceptable at the HBA level (Psychology) as an HBSW is acceptable through the OCSWSSW to practice psychotherapy</p>			
CRPO Registrant	Disagree	<p>I believe an emergency class will only dilute the requirements to become a RP.</p>	X		
CRPO Registrant	Disagree	<p>While the need to expedite health care services in emergency situations is important, it should not be at the detriment of regulated care. Allowing people to offer therapeutic services before having completed all CRPO requirements feels negligent and potentially dangerous. Yes, people would be receiving care faster but my concern is around the quality of care they be would receiving.</p>	X		

CRPO Registrant	Disagree	Concerned that in a state of emergency ill equipped individuals will be moved as a registered psychotherapist which will cause harm to the profession and individuals of the public. For members of the public it could cause greater difficulty during an emergency which may prevent them from seeking therapy in the future. Concerned the information submitted to be approved my CRPO will never be reviewed due to the large amount of applicants.	X		
CRPO Registrant	Disagree	I agree with some parts and not others. Thanks!			
CRPO Registrant	Strongly disagree	Psychotherapy is not "emergency" or crisis services - it is, by definition, longer-term services in order to address "an individual's serious disorder of thought, cognition, mood, emotional regulation, perception or memory that, may seriously impair the individual's judgement, insight, behaviour, communication or social functioning (RHPA 1991)." That simply cannot be done in a provision of emergency or crisis services that by definition are short-term.			X
Psychotherapy client	Strongly disagree	Having more therapist will not help with the mental health crisis - an increasing in funding to have access to these services will		X	
Stakeholder representing a service providing organization	Strongly disagree	The issue of access to mental health care is not due to a lack of mental health professionals, it's due to a lack of mental health funding and coverage. Further funding needs to be provided to improve financial access to mental health services.		X	
Psychotherapy client	Strongly disagree				
CRPO Registrant	Strongly disagree	We must uphold the standard of therapy the CRPO has set - that means no one can be rushed through the system. The requirements are fair, and all current registrants have gotten through. Especially for an emergency class, the individuals who respond should be highly trained, highly skilled, and not just individuals who have been rushed through. This will be damaging for the client, for psychotherapists in general, and to the college.	X		
CRPO Registrant	Strongly disagree				
CRPO Registrant	Strongly disagree				
CRPO Registrant	Strongly disagree				
CRPO Registrant	Strongly disagree	The Profession of Psychotherapy is already greatly diminished in its' standing as compared to persons of equivalent educational and professional qualifications, for example dentistry. The profession is sadly underpaid compared to that of similar standards. There is absolutely no shortage of professional psychotherapists in Ontario, in fact there is now a plethora of under-qualified persons' offering service as counsellors through third party services. It is difficult for a private practitioner already for overhead. The public information about what a psychotherapist needs to improve as does the coverage by insurance providers through this better understanding. For example Greensield often allows coverage for counselors but not psychotherapists, the Police Commissioner "improved" OPP coverage by only allowing psychotherapists supervised by psychologist but expanding one contract with an EAP. If the standards of language and education for a Registered Psychotherapist are lowered, so will our profession be diminished, the ability to practice by those already and fully earned as RP's and you are making way for more 3rd parties to control the services provided through cheaper, more puppy-milled services of therapists new and willing to accept cheaper rates. It is abhorrent that is what is happening to health care here. The standards of those entering the practice need to be stringent and upheld, not diminishing our standards to meet those of developing countries. There is no real shortage at all. The shortage is in the integrity to maintain the profession at a high standard thereby encouraging better coverage. 8 years (16 academic semesters) of University warrants this. The solution I believe is to improve the province to cover properly registered and insured Registered Psychotherapists.	X	X	X
CRPO Registrant	Strongly disagree	It looks like the emergency class amendments are intended to increase capacity by compromising the quality of care that psychotherapists should provide. It's even more important to maintain that care, as shown by meeting the minimum registration/test/	X		

		exam criteria in emergency settings. I think the proposed changes have the potential to harm the public create damage to the regulated profession.			
CRPO Registrant	Strongly disagree	I think the notion of an emergency class of registration poses undue risks to the public	X		
CRPO Registrant	Strongly disagree				
Stakeholder representing a service providing organization	Strongly disagree				
CRPO Registrant	Strongly disagree				
CRPO Registrant	Strongly disagree	Given that there are now more and more Canadians who are seeking the RP status (it has become a popular program), I believe that there are many such Canadian RPs who don't yet have a full practice. Yet, they have invested long hours training and large sums of money to educate themselves. I wonder why the government is suggesting the implementation of a new 'Emergency RP' status, if there are many RPs who are still trying to build their practice, and who are not yet being fully utilized. RPs are professionals who, like other professionals, deserve to be compensated fairly. Is the government willing to provide programming that is government sponsored, so that the public can avail themselves of services, yet where the RP is being paid competitively? I am not sure why there is the belief that there are not enough practitioners. My understanding is that there is a lack of psychiatrists who can diagnose and prescribe - this is where there is a real shortage of services. I am confident that there are sufficient nos. of Canadian RPs who would be very pleased to gain more clients so as to consistently fill their roster. Perhaps if the government funded such services with competitive pay to Canadian practitioners (e.g. have it covered by OHIP), then those in need of mental health care services who lack the funds to pay for it privately, would be able to receive care by qualified Canadians. Are other regulatory bodies (eg. social workers, etc.), in addition to the CRPO, considering reducing their requirements to obtain status as a professional practitioner? Does the government intend to utilize these "Emergency status RPs" as a lower paid practitioner, so that Canadian RP practitioners become pressured to lower their fees, or to lose their client base?		X	X
CRPO Registrant	Strongly disagree	Ontario is well saturated with psychotherapists. There are already difficulties getting insurance companies on board. Programs are churning out grads at an alarming rate. There is not enough work, we are not paid enough in agencies. We do not need a mechanism to fast track new registrants. We need advocacy from you.		X	X

Appendix C – Competition Bureau Canada Submission



April 14, 2023

Competition Bureau comments on the Creation of Emergency Class Certificate of Registration

Thank you for the invitation to comment on the creation of emergency classes of registration as required by Ontario Regulation 508/22 under the *Regulated Health Professions Act, 1991* (Amendments).

The Competition Bureau (Bureau), as an independent law enforcement agency, ensures that Canadians prosper in a competitive and innovative marketplace. As part of its mandate, the Bureau promotes and advocates for the benefits of competition.

Why competition matters

Ontario's health regulatory Colleges (Colleges) play a critical role in protecting the public by making sure healthcare professionals are safe, ethical and competent.¹ Pro-competitive policies can help to advance these goals, as described in our market study: [Empowering health care providers in the digital era](#). The study explained how policymakers can leverage technology to gain the benefits of competition including improved quality of care, access to care and fostering innovation and its adoption. Pro-competitive policies can have other benefits in healthcare, including contributing to the resilience of the workforce by lowering barriers to entry. As made evident by the COVID-19 pandemic, this is particularly important during emergencies, which can create additional shortages and pressures on healthcare workers.

The Bureau recommends that the Colleges create these emergency classes of registration to maximize the benefits of competition, such as increasing the supply of qualified healthcare workers, and advance their goal of protecting the public. Further, the lessons learned in the process may also be used to benefit competition and public safety during times of non-emergency.

Competition assessment in policymaking

The Bureau's [Competition Assessment Toolkit](#) was designed to assist policymakers in identifying competition issues and tailoring policies to maximize the benefits of competition. Once a policy is identified for assessment, the policymaker should consider whether it has the potential to restrict competition. This may be the case if it makes it difficult for businesses to emerge or compete, or for consumers to make informed choices or switch products or services.

The policymaker should then consider whether a feature in the policy that could restrict competition is necessary, narrowly cast and proportionate. If there is an alternative that

¹ Health Profession Regulators of Ontario (2023). [Professions and their Regulatory Bodies](#).



achieves their policy goal in a more competition friendly manner, they should implement it accordingly and monitor its effects moving forward for any unintended consequences.

Restrictions and alternatives

The various registration requirements set out by the Colleges for healthcare workers to practice are barriers to entry for future workers. Such barriers are intended to keep the public safe by ensuring that healthcare workers are ethical and competent to practice. During an emergency though, increased demand for healthcare services and strains on healthcare workers can result in labor shortages that may present their own risk to public safety.² Temporarily easing these registration requirements with an emergency class of registration (and thereby increasing or speeding up the entry of healthcare workers) can balance these risks.

By setting up the emergency class of registration to only be as restrictive as necessary during times of emergency, the Colleges can maximize the benefits of competition (i.e. a more resilient healthcare workforce and patient safety). The Amendments require the Colleges to establish registration requirements for individuals joining the emergency class. These requirements can be used to lower barriers to enter the profession. For example, by allowing for competent healthcare students, recent graduates or accredited workers from other jurisdictions to register and by exempting certain requirements for emergency class registrants to move to another class. To strike the right balance between the risks and benefits associated with temporarily lowering these barriers requires the medical expertise of the Colleges. The Bureau hopes that the framework of a competition analysis presented in the Competition Assessment Toolkit may be helpful in doing so.

The Bureau also encourages the Colleges to consider how pro-competitive policies can benefit patients and healthcare workers outside of times of emergency as well. The Amendments require the Colleges to specify a path for healthcare workers in the emergency class to move into other classes of practice and to be exempted from certain registration requirements in doing so. Such exemptions will lower barriers to entry for those workers on a more permanent basis. These lowered barriers are likely to result in faster entry and more licensed healthcare providers, and as a result, a more resilient workforce. As such, the competitive benefits of the emergency class certification extend outside of times of emergency. We encourage the Colleges to use their expertise to make these exemptions as broad as possible to maximize the benefits of competition, while still meeting the central health and safety objectives of registration requirements.

In making these decisions, as in performing any competition assessment, the Colleges should base their decision to the greatest extent possible on objective empirical evidence.³ To the extent data on the effects of similar exemptions in other jurisdictions or during the COVID-19 pandemic are available, this could inform their decision. It may also be beneficial to track data on worker entry and patient safety for healthcare workers operating under the emergency class provisions going forward. This data could be used to make future adjustments to the exemptions provided for under the emergency class, relaxing or

² Canadian Institute for Health Information (November 2022). [Health workforce in Canada: In focus \(including nurses and physicians\)](#).

³ Competition Bureau (2020). [Strengthening Canada's economy through pro-competitive policies](#). See Step 3: Identify alternatives to address policy goals, if necessary.



tightening them as needed.⁴ Perhaps more importantly, this same data could also be used to determine whether the regular registration requirements are as necessary, narrowly cast and proportionate as can be. Having identified how much these barriers to entry can be safely lowered to offset the risk of worker shortages during times of emergency, those lessons may be used to maximize the benefits of competition in ordinary times.

We're here to help

The Bureau's goal is to promote the benefits of competition across the Canadian economy. On the other end, policymakers, as subject matter experts and authorities, are in a unique and critical position to seize upon these benefits. By incorporating competition analysis into your policy assessment, you can maximize the benefits of competition while still achieving your policy goals.

Such competition analysis can be complex, but is worthwhile and the Bureau can help. If you would like to discuss the Competition Assessment Toolkit, or have questions about particular policy proposals or the suggestions above, please contact our Competition Promotion Branch.

Yours Truly,

**Callaghan,
Bradley** Digitally signed by
Callaghan, Bradley
Date: 2023.04.17
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Bradley Callaghan
Associate Deputy Commissioner
Competition Promotion Branch
Competition Bureau

