



Dr. Catherine Yarrow, Executive Director
Dr. Rick Morris, Deputy Registrar
College of Psychologists of Ontario
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September 3, 2010

Dear Drs. Yarrow and Morris:

On behalf of the Canadian Psychological Association (CPA), I appreciate the opportunity to respond to the request from the College of Psychologists of Ontario (CPO) for feedback on its proposed amendments to Ontario Regulation 533/98, Registration.

As you know the CPA is the country's national association of psychologists with a membership base of approximately 6500. CPA's mandates revolve around the promotion of the practice, science and education of psychologists. One of our key activities in education is the accreditation of the doctoral programs in professional psychology that train Canada's psychologists. The credentials that prospective psychologists bring to regulatory bodies, such as the CPO, are entirely dependent on the requirements exacted of them by the programs that train them and which CPA accredits. Accordingly, CPA brings an important perspective to the registration requirements of psychologists across the country.

CPA has been concerned about the implications and implementation of the AIT and has voiced these in an article published in our quarterly newsletter and which we have shared with the CPO in the past and do so again as an attachment to this submission
([http://www.cpa.ca/cpsite/userfiles/Documents/PsynopsisFall09Final\(1\).pdf](http://www.cpa.ca/cpsite/userfiles/Documents/PsynopsisFall09Final(1).pdf))

Although we appreciate and endorse the importance and benefits to the country when the mobility of our health human resource is supported, the crux of our concern centres on the mechanisms (or lack thereof) upon which mobility will rely.

It is our understanding that the AIT charges regulatory bodies of the country's health care professions to come up with a standard and mechanism to support workers licensed in one jurisdiction to move to and attain registration in another Canadian jurisdiction. Although the regulatory bodies are not being told what standard or mechanism they must put in place to support mobility, neither are they being given the authority to develop and implement any. As needs no explanation to the CPO, the requirements for registration as a psychologist differ across Canada's 12 provincial and territorial regulatory bodies. There is variability around degree required for registration (masters versus doctoral), academic requirements (graduation from a psychology programme with a graduate degree in psychology versus the completion of specific graduate psychology or equivalent courses) title (psychologist versus psychological associate) and, to some lesser extent, scope of practice (differences among jurisdictions in what titles and activities are restricted).

CPA is concerned whether governments will take the position that any registration requirement or standard for regulated practice that is acceptable and successful in one jurisdiction must be acceptable to all jurisdictions. If so, this means that mobility may become based on a practice standard unique to one jurisdiction and discrepant from those upheld in the majority of Canadian jurisdictions. A standard agreed to and upheld by several jurisdictions is more valid than one that is unique to one – whether the unique standard is one that is more or less rigorous than the majority standard. Provincial, territorial and federal governments, in addition to regulatory bodies, need be invested in valid standards for competent practice. By definition, it is a valid standard that can provide better public protection and, it is public protection that is the overriding mandate of governments and regulatory bodies.

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We appreciate that the regulatory bodies organized under ACPRO (Association of Canadian Psychology Regulatory Organizations) are interested and mobilized to develop a consensus standard around registration requirements for Canadian psychologists. This standard, however, will be meaningful and useful only if the regulators have the authority to implement it.

By giving the 12 regulatory bodies a high degree of responsibility to come up with a standard or mechanism for mobility, coupled with a very low degree of authority to enforce any particular mechanism or standard across all Canadian jurisdictions, it is difficult, if not impossible, for a common mechanism or standard to ever be implemented. If the AIT does not give regulatory bodies the authority to implement a common standard for registration then effectively any one jurisdiction gets to determine the registration requirements for the entire country. Although this might not amount to federal regulation of the health professions, it does not respect individual jurisdictions' legislated roles and responsibilities in the delivery of health care. Further, it allows for a situation in which the view of a dissenting jurisdiction(s) determines the standard for the majority. A far better outcome would be were the AIT to confer the authority on regulators to agree on and enforce adherence to a common standard – this way, at the worst we would end up with a situation in which the view of the majority might impact a dissenting few.

We understand that there is a mechanism for each jurisdiction to apply for a legitimate objective such as might be the case when the scope in practice of a profession differs from one jurisdiction to another, but our understanding is that decisions granting legitimate objectives are not consistent from jurisdiction to jurisdiction. Any inconsistency in how these decisions are being made potentiates differences rather than commonalities.

Further, in the absence of the authority necessary to implement a common standard, we can foresee a potential and important impact on the country's health human resource. Registration in a jurisdiction with the least onerous requirements, coupled with ready access to practice in every other jurisdiction, may mean that health care providers will seek licensure in one jurisdiction, fulfil any minimal residency requirements, and then seek mobility to their jurisdiction of choice. This would potentiate an already existing problem that some areas of the country are significantly underserved by health care providers.

As specifically concerns the proposed amendments to Ontario's Regulation 533/98, Registration circulated for comment by the CPO, we have a couple of comments. We applaud the proposed change in Section 5 that registrants must have a degree in a *psychology program*, rather than in a program of study with content that is *primarily psychological in nature*. There is a difference between a degree and a program. A program endeavours to provide organized and comprehensive training, in this instance, in professional psychology. A degree, in the absence of a program, may graduate students who lack certain competencies that are crucial to the practice of psychology. This creates a greater burden on the regulatory bodies when they then have to ascertain whether the graduate of the non-professional programme in fact amassed the competencies necessary for licensure and competent practice in psychology.

As reviewed in more detail in the attached article, a survey we undertook in 2006 revealed that of the relatively few psychology departments that accorded a terminal masters degree that students used to obtain registration in a Canadian jurisdiction were not programmes intended to graduate students with the qualifications for registration as a psychologist or psychological associate. It is of considerable concern to the CPA that psychologists would be registered to practice without having completed a programme of study organized and intended train practitioners. It was of more concern to us to learn through our survey that students are seeking registration as psychologists having completed degrees that may have some related or psychological content but are not psychology degrees offered within departments of psychology.

As you know, the CPA has been accrediting doctoral and internship programmes in professional psychology since 1984. Accreditation is governed by a set of Standards and Procedures to ensure that psychologists in Canada are trained for competent practice. The Standards require the completion of a doctoral degree programme offered, in an area of professional psychology, under the direction of and delivered by a psychology faculty at a provincially or territorially chartered Canadian university. Further, validity of CPA's Standards around degree can be evidenced by the fact that the growing trend among Canadian regulatory bodies of psychology (Quebec and New Brunswick as the most recent examples) is to make the doctoral degree the academic requirement for registration as a psychologist and the fact that the doctoral degree standard has long been universally required by state regulators in the United States.

Neither master's programmes or degrees offered within or outside of departments or faculties of psychology would meet the accreditation standards and criteria set by the Canadian or American Psychological Associations. When considering the training and mobility of our health human resource, it is important to consider the impact of our standards and practices not just upon mobility within Canada but also between Canada and the United States. American students seeking training in Canada will be interested only in accredited doctoral degree programmes so that they may return to licensure in the U.S. and Canadian students seeking internship experience in the U.S. with which to return to practice in Canada will not be eligible for same unless they are also being trained within doctoral degree programmes in Canada.

One concern we do have about Section 5 of the CPO regulations is our understanding that it applies only to registrants seeking initial registration in Ontario. Registrants who seek registration in Ontario under AIT will be exempt from this and virtually all other of the CPO's requirements – as long as the prospective registrant holds *an equivalent certificate of registration as a psychologist in another Canadian province or territory that was signatory to the amended Agreement on Internal Trade and be authorized by law to practice psychology autonomously in that jurisdiction*. Our query here is what will be considered an equivalent certificate and who gets to decide upon equivalency. For the reasons detailed above, it is CPA's view that the skills, knowledge and competencies attained by someone who attains registration based upon the completion of psychology or related master's courses are not equivalent to those attained by someone trained within a doctoral degree programme in professional psychology – particularly a CPA-accredited doctoral programme in professional psychology.

This raises another issue which ACPRO might need to address – because of the variability in requirements for registration across Canada's regulatory bodies of psychology, we cannot assume that because each claims to be regulating psychologists, they are in fact regulating the same kind of practitioner. As you know, there are many regulated and unregulated mental health care providers with overlapping, but not identical, skill sets and scopes of practice. A psychologist in one jurisdiction might have a more similar skill set to a counsellor in another jurisdiction. Though each might be making legitimate and competent contributions to the mental health care of Canadians, they may not be the same contributions.

As you may know, the CPA has been funded by the Public Health Agency of Canada to develop an electronic practice network of psychologists across the country designed to give us an understanding of the demographic and practice characteristics of psychologists and the demographic and clinical characteristics of the clients they treat. We are just in the process of data analysis but to date it appears that one of the factors that impacts practice is type of degree preparation – as an example, doctoral level providers are more likely, and master's level providers are less likely, to diagnose mental health disorders.

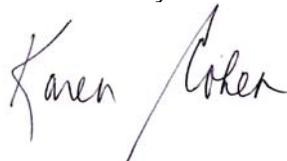
Finally, and this is something that has likely already occurred to the CPO, if the CPO confers the title psychologist to a master's prepared practitioner registered as a psychologist in another Canadian jurisdiction who seeks registration in Ontario under AIT, how can the CPO continue to confer the title psychological associate to the practitioner who is trained to a master's level standard but applying to

Ontario upon initial registration? Will the CPO continue to register initial applicants at the master's level? If so, and they confer them the title psychologist because of the implications of the AIT, then as mentioned earlier, the role and responsibility of the provincial jurisdiction to regulate health practice will effectively have been circumvented by the AIT.

In sum, the CPA appreciates the role and responsibilities of health regulatory bodies in complying with the AIT and we appreciate the value and importance of supporting the mobility of Canada's health human resource. It is our recommendation that in so doing

1. The AIT must give health regulatory bodies the authority not only to develop, but to implement, a standard for registration as a psychologist across Canada that is supported by the majority, not the minority of the country's regulatory bodies in psychology. There must be a mechanism to compel all jurisdictions to meet a standard agreed to by this majority. In its current form, the AIT will succeed in compelling the majority to accept the standard of the minority. The AIT needs to support adherence to a standard upheld by the majority.
2. Having been charged with the responsibility to develop a common standard for registration as a psychologist in Canada, the members of ACPRO need to carefully consider the importance of programme, and not just degree preparation. Programs not only set standards with which to train students but also against which they can evaluate their competencies. A degree or collection of courses that might enable a student to seek registration gives regulators and the public far less assurance about a practitioner's competence to practice than does a program designed and organized to graduate practitioners.
3. In developing a common standard for registration as a psychologist in Canada, the CPA encourages the CPO and ACPRO to consider the prevailing accreditation standards for training in professional psychology in Canada and the United States. Accreditation in psychology in North America has history decades long and is held up as a model worldwide. Competent practice of any profession depends upon the validity of its standards of training. The development of a common standard across the country and reliance on established and tested standards of training like those that underlie accreditation, will help create valid standards against which to assess the competencies of health professionals and, ultimately, with which to protect the public.

Yours sincerely,

A handwritten signature in black ink that reads "Karen Cohen". The signature is written in a cursive style with a large, sweeping initial "K".

Karen R. Cohen Ph.D., C. Psych.
Executive Director