

September 25, 2025

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Dear Dr. Nicholson and Dr. DeBono,

We are writing as the provincial and national professional psychological associations that represent registered psychologists and psychological associates in Ontario and across Canada to urge the council to vote against the proposal to decrease training standards for psychologists and psychological associates in Ontario. Together, the Ontario Psychological Association (OPA) and Canadian Psychological Association (CPA) represent over 80% of the psychologists registered to practice in Ontario.

We recognize the CPBAO's need to address the concerns raised by the Office of the Fairness Commissioner (OFC) in its 2023-24 annual report, which included lengthy and complex registration processes, low success rates for internationally trained applicants, inconsistent entry standards across provinces, and insufficient workforce capacity. We also acknowledge the need for the CPBAO to be responsive to the requirements of proposed "as-of-right" legislation, including the need to improve processes related to interjurisdictional mobility of psychologists. However, significantly altering registration requirements for psychologists and psychological associates—including the potential removal of the doctoral standard for psychologists and the elimination of the post-masters work period prior to supervised practice for associates – is not the way to address these concerns. These are two of the more serious proposed changes, but there are additional aspects of the proposal that are also concerning. The CPBAO, as a signatory to the Association of Canadian Psychology Regulatory Organization's (ACPRO) position statement on a National Standard of Entry to Practice for Psychologists, supported the doctoral degree as the entry-to-practice credential for psychologists in Canada and established this position as one of protection of the public. Indeed, Health Canada's 2025 ethical framework cautions that mobility strategies should not erode registration standards, which is what the proposed changes appear to be doing.

Instead of endorsing the proposed changes to the entry-to-practice requirements, we ask the Council to work collaboratively with other provincial/territorial psychological regulators, professional/territorial psychological associations, and the psychology training community to pursue reforms that address genuine barriers to equity and access, are guided by outcome data and broad consultation, enable inter-provincial/territorial and international labour mobility, and preserve rigorous training and scope distinctions that protect the care Ontarians receive.

In the short-term, reforms that can immediately address the OFC's concerns and "as-of-right" legislation can include:

1. Streamlining and harmonizing registration processes across provinces/territories for already-licensed psychologists.
2. Permitting interim registration for those completing post-masters work.
3. Modifying post-registration supervised practice requirements for accredited graduates

Longer-term reforms can include:

1. Establishing a nationally harmonized doctoral entry-to-practice standard for psychologists to improve labour mobility while maintain public protection.
2. Working with the training community to evaluate and update current training models and curricula - including investing in the creation and expansion of Doctor of Psychology (PsyD) programs - to reduce the time it takes to train psychologists and graduate more psychologists while maintaining training standards.
3. Improving remuneration for psychologists in the public sector to attract and retain talent.

Currently, some provincial psychology regulators are increasing their licensure requirements in recognition of the specialized training required to practice independently as a psychologist. Others are making significant headway in securing government investments in the doctoral standard. Further, the Government of Ontario, is consulting on proposed changes to increase the scope of practice of psychologists to include prescriptive authority. This is not the time for the CPBAO to lower its training standards; doing so risks the quality of care provided to Ontarians and could have unintended consequences for entry-to-practice standards across the country. Such a move would constitute a serious threat to public safety.

Both the OPA and the CPA fully support the labour mobility of our members, as well as the goal of improving representation within – and access to – our profession. It should be recognized that the training and roles of other mental health providers, including but not limited to psychotherapists, social workers, and nurse psychotherapists, do not match the training and expertise required for independent practice as a psychologist.

Evidence-based diagnosis and psychometric assessment, treatment planning and delivery for complex mental health conditions, effective clinical supervision, program development and evaluation, and advance research literacy form part of the core competencies expected of psychologists, and these competencies require significant training. As you know, it is because of their rigorous training that psychologists are uniquely qualified in these areas, providing essential oversight, leadership, and specialized care that protects public safety. Reducing our training standards risks undermining psychologists' contributions to public health and could negatively impact patient outcomes.

We appreciate your careful consideration and urge you to support changes that strengthen—not dilute—the role of psychologists in Ontario's healthcare system.

We would be pleased to discuss these issues with the Council at your earliest convenience and welcome the opportunity to work with you to identify and implement reforms to support the labour mobility of psychologists.

Sincerely,

Laura Nichols, Ph.D., C. Psych.  
President, OPA

Steven M. Smith, Ph.D.  
President (2025-2026), CPA

Richard Morrison  
Chief Executive Officer, OPA

Lisa Votta-Bleeker, Ph.D.  
Chief Executive Office, CPA

## References

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