



OACCPP

An Association of Mental Health Professionals

ONTARIO ASSOCIATION
OF CONSULTANTS,
COUNSELLORS,
PSYCHOMETRISTS AND
PSYCHOTHERAPISTS

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April 4, 2018

Subject: Response from OACCPP Regarding Public Consultations for the Controlled Act of Psychotherapy

Dear Deborah Adams and Carol Cowan-Levine,

On behalf of the Ontario Association of Consultants, Counsellors, Psychometrists and Psychotherapists (OACCPP), I would like to take the opportunity to congratulate the *Controlled Act Task Group* for their continued important work around further defining the *controlled act of psychotherapy*. We have encouraged our members to respond to your call for public consultations directly.

The documents have also been reviewed by our Board Members and Public Policy and Executive Committee members. I would like to share the valuable input we've received and hope that this feedback contributes in some fashion to adding value to your deliberations.

Overall the documents flow well, but further thought may need to be considered for a standard introduction to each section, referencing the other sections. If these documents are meant to form a "package" or complement each other in their clarification of the Controlled Act, it will be important to any reader that there are companion documents that contribute to the understanding of the whole.

Specifically we offer the following comments related to each Section:

Section A: Psychotherapy with a Registered Psychotherapist:

- In the introductory paragraph the use of the word "individuals" may be better served by using "people". In some therapy situations, there is more than one individual receiving therapy - i.e., couples, family and group work.

- There was concern with the use of the term "competent" as this is a subjective term; using language such as "trained" or "registered" conveys a vetting process that reflects "competent".

Section B: Categories of Prescribed Therapies Involving the Practice of Psychotherapy:

Concern has been expressed with the use of the term "prescribed therapies" throughout the entire draft document; specifically, this term held connotations to traditional medicine. It's recommended that the Task Group consider using the term "designated", "assigned", or "recommended" therapies, in lieu of the term "prescribed."

Section C: Activities that are not part of the Controlled Act of Psychotherapy:

- It has been suggested that the title of this Section be adapted to: **Differentiating Activities that Are Part of the Controlled Act From those that are Not.**

Reading the first sentence, there was confusion if the controlled act requires that all the factors in Section C need to be true or just one, for a Registered Therapist to engage in the controlled act of psychotherapy. In addition, there was concern regarding the use of the term “serious disorder.” It’s recommended that this term be further defined for these purposes and in this context. A foot note or note to reference how this is determined or defined may be helpful.

In the listing of activities in the section, under Rehabilitation, we suggest adding “physical” symptoms to the bullet point “*helping an individual to deal with ‘physical’ symptoms of a medical illness.*” In some situations of Rehabilitation, the burden of a medical illness contribute towards emotional or mental issues that may be addressed by some RP’s.

Section D: Companion Document for Registered Psychotherapists,

Beyond our concern with the term “prescribed,” as noted earlier, no further comments related to this portion of the document.

Section E: Self-Assessment tool for unregulated practitioners:

The idea of a Self-Assessment tool is an excellent resource and will prove useful in a number of contexts.

To further assist with the clarity of using this tool, we are recommending that the instructions at the beginning emphasize that it is important to complete all questions.

The bulleted text that appears below each question has the potential to confuse the reader. It’s recommended that the notes under the questions be unified into a “guide” or “answer key” at the end of the self-assessment tool, as opposed to at the end of each question.

Additionally, concern was raised over the use of the term “competent,” as it evokes a certain level of subjectivity; we recommend the use of the term “regulated” in this case.

Document F: Registered Psychotherapists- Information for Ontarians:

Adding clearer language surrounding the scope of work performed by Registered Psychotherapists would strengthen this document. For example, highlighting that RP’s have specific training to deliver and practice the controlled act of psychotherapy.

We suggest reframing the language to increase the trust of Ontarians regarding how Registered Psychotherapists are educated, vetted and regulated within the CRPO and are positioned to practice and deliver the Controlled Act of Psychotherapy.

We are concerned about the use of the term “qualified” practitioners, as this term is rather ambiguous. We recommend the term “regulated” be used instead.

There was noted concern that defining the controlled act of psychotherapy as a smaller aspect of the overall practice of psychotherapy does little to add clarity for either the lay person or the non-regulated professional.

In presenting this collection of our thoughts and reflections, we wish to stress that they are offered as a means to provide clarity and honest reaction to the draft documents presented and are offered in good faith to you.

We look forward to the continued efforts to both engage with us as stakeholders and in the process of creating clarity for all.

Warm regards,

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President,
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