



OACCPP

An Association of Mental Health Professionals

ONTARIO ASSOCIATION
OF CONSULTANTS,
COUNSELLORS,
PSYCHOMETRISTS AND
PSYCHOTHERAPISTS

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CRPO
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Sent via E-mail to info@crpo.ca

RE: OACCPP Draft Response to Proposed By-law changes at CRPO regarding fees for RPs

Good day,

On behalf of the Ontario Association of Counsellors, Consultants, Psychometrists and Psychotherapists (OACCPP), I would like to take this opportunity to express our Association's views on the proposed changes to CRPO's by-laws, in particular Section 19.03 regarding fee amounts.

The Association acknowledges the dedication and work undertaken by the College with regards to defining and administering the Psychotherapy Act. However, that being said, at this time the OACCPP would strongly advise against the fee changes proposed in Section 19.03.

While we believe that the Controlled Act of Psychotherapy is an important and timely piece of legislation, we're also cognizant of the fact that this new regulatory framework has caused significant upheaval among mental health professionals in the province. Our member's, many of whom are members of the CRPO, are facing considerable burdens as they seek to determine where their practice is situated within the new regulatory framework.

In addition RPs continue to face considerable resistance from third-party insurance providers to recognize psychotherapy as an eligible mental health service. Naturally, this leads to much greater out-of-pocket expenses for these mental health services—costs that discourage many Canadians from seeking the support they need to face their mental health challenges.

Finally, RPs continue to work without the HST exemption that is applied to all other RHP professionals, adding yet another financial barrier to their clients.

These factors combined are already putting significant pressure and financial burdens on Registered Psychotherapists. In addition, the College of Psychologists of Ontario's (CPO) recent announcement that RPs should not use the term "supervision" to define the relationship of consultation between a registered psychologist and qualifying RPs; only adds to this environment of uncertainty. This announcement represents a threat to those few third-party insurance arrangement RPs have currently established; as many stipulate the need for a supervisory agreement with a psychologist as a precondition for reimbursement of service fees.

The OACCPP fully recognizes the financial obligations the College must consider for its continued operation; however, with the closure of the Grandparenting route to entry, it would be assumed that this would result in a dramatic decrease in the administrative burdens placed upon the College.

Our member's have expressed concerns surrounding current membership fees and their own value proposition for the College. There is a sense of dismay that even when the costs are in line with other colleges, there is still an unequal value placed on the work performed by Registered Psychotherapists. The work and value reflected through the current turbulent environment, as outlined above, add to the challenges faced for acceptance of the work undertaken by RPs. Unfortunately this is no small challenge.

The Association would challenge the timing of enacting the proposed fee increase; as the mental health profession is in a state of flux due to these proposed regulatory changes. Our membership has clearly expressed their desire to see the CRPO postpone bringing forward the proposed fee increases until some of the above pressures have diminished and until there is a higher recognition within the broader practitioner environment of the title "Registered Psychotherapist"

Thank you for your consideration.

Respectfully submitted on behalf of OACCPP,

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