

Self-Assessment Tool for Unregulated Practitioners

Background

Anyone whose work falls within the [scope of the practice of psychotherapy](#), and who is not already registered with another Ontario regulatory college, whose members can provide the controlled act of psychotherapy, should consider becoming a member of CRPO.

No one may use the title “Registered Psychotherapist” or any abbreviation thereof unless they are registered with CRPO. Members of the other professions that are authorized to provide the controlled act may use the title “psychotherapist” and hold out as qualified to practise as a psychotherapist in Ontario provided they do so in compliance with the regulations and bylaws set out by their regulatory colleges.

Additionally, once the transition period built into the [December 2017 proclamation](#) of the [controlled act of psychotherapy](#) ends on December 31, 2019, anyone whose practice involves the provision of the controlled act must be registered with one of the six colleges authorized to perform that act.

Instructions

This tool is intended to assist unregulated practitioners in determining if they should consider applying for registration with CRPO or another regulatory college, or if they need to consider restricting their practice. There are four components assessed by this tool: the scope of psychotherapy, the controlled act of psychotherapy, the psychotherapeutic relationship and the entry-to-practice requirements. **All seven questions should be answered and considered in determining what course of action a provider should be taking with their practice.**

Questions:

1) Does your work primarily involve one or more of the following *in isolation* or in *the absence of a psychotherapeutic relationship*?

- Advocating
- Applied Behaviour Analysis
- Case management
- Clinical follow-up / care and discharge planning
- Coaching
- Coordinating services
 - *parental coordination*
- Counselling and support
 - *advising / advice giving*
 - *instruction*
 - *assisting in resolution of dilemmas*
 - *assisting in improvement of coping strategies*
- Crisis intervention / management
 - *de-escalation*
 - *safety planning*
 - *referral to other services*
- Hypnotherapy
 - *smoking cessation*
- Information/ advice and knowledge transfer
 - *instructing*
- Intake and referral
- Mediating
- Milieu therapy / milieu-based interventions
- Monitoring
- Problem solving
 - *information and advice giving*
 - *12 step program*
 - *social skill development*
 - *instruction*
 - *emotional regulation*
- Psychometric testing and assessment
- Rehabilitation
 - *helping an individual to deal with the physical symptoms of a medical illness*
 - *resuming activities of daily life*
 - *learning or relearning skills that assist in carrying out the activities of daily life*
- Single session counselling
- Spiritual or faith guidance/counselling
- Teaching
 - *social skill development*
 - *emotion regulation*
 - *prescriptive programs*

Answer: Yes No

Unregulated providers (many of whom work with vulnerable populations in the education, social services, victim services and community sectors) often establish genuine and therapeutic relationships with their clients to improve health outcomes and well-being. While the providers may use some psychotherapeutic techniques as an ancillary to their duties, the goals for meeting and the relationship created are not, nor intended to be explicitly psychotherapy.

2) Are you establishing and maintaining an ongoing psychotherapeutic relationship with your clients as indicated by all of the following:

- There is an explicit intent to engage in psychotherapy.
- You are responsible for having a conversation with clients about the **benefits, risks and expected outcome(s)** of the psychotherapy.
- You are responsible for gaining the client's **informed consent**.
- You are responsible for developing, with the client, a mutually agreed upon **goal** or **plan** for the psychotherapy.
- You ensure that each therapy session has a **clear beginning** and a **clear end** where problems or concerns are presented and discussed and outcomes are explored.
- You demonstrate the appropriate use of **boundaries** to create a **safe and confidential environment**.
- You are responsible for ensuring that the client's well-being is at the forefront of the relationship.
- You work with the client to gather relevant information that will support the formulation of a plan for psychotherapy.
- You continuously evaluate outcomes of each session and the impact on overall treatment goal(s).

Answer: Yes No

Psychotherapy occurs when the Registered Psychotherapist (RP) and client enter into a psychotherapeutic relationship where both work together to bring about positive change in the client's thinking, feeling, behaviour and social functioning. Individuals usually seek psychotherapy when they have thoughts, feelings, moods and behaviours that are adversely affecting their day-to-day lives, relationships and the ability to enjoy life.

While psychotherapy and counselling are two distinct interventions, there is or may be a continuum of care where *Registered Psychotherapists* may include interventions that could be classifiable as 'counselling' as part of the provision of psychotherapy. For instance, RPs may work with a client to address a specific and current dilemma in a particular session by offering information or advice to assist with practical coping. Likewise, counsellors may employ psychotherapeutic techniques to support the fostering of skills to assist clients in increasing their ability to cope with a specific dilemma. In spite of this overlap, providers and observers should be able to discern the distinct difference between psychotherapy and counselling in its intention and focus.

3) Are you providing treatment to clients for cognitive, emotional or behavioural disturbances to improve or maintain their mental health and wellbeing?

Answer: Yes No

4) Are you trained in, competent with and using psychotherapy modalities from one or more of the following five categories of prescribed therapies described in Regulation or policy?

Note: The modalities listed below are intended to be representative but not exhaustive.

Cognitive and Behavioural Therapies

- *Acceptance and Commitment Therapy*
- *Cognitive Behaviour Therapy*
- *Dialectical Behaviour Therapy*
- *Exposure Therapy*
- *Mindfulness Based Cognitive Therapy*
- *Rational-Emotive Therapy*
- *Schema Therapy*

- *Existential Therapy*
- *Psychoanalytic Psychotherapy*
- *Interpersonal Psychotherapy*
- *Jungian Analysis*
- *Object Relations Psychotherapy*
- *Reichian Therapy*
- *Relational Psychotherapy*

Experiential and Humanistic Therapies

- *Art Therapy*
- *Emotion-Focused / Emotionally-Focused Therapy*
- *Gestalt Therapy*
- *Multi-cultural Therapy*
- *Music Therapy*
- *Play Therapy*
- *Psychodrama*
- *Rogerian Person Centred Therapy*
- *Spiritually Integrated Psychotherapy*
- *Satir Transformational Systemic Therapy*
- *Sex Therapy*

Somatic Therapies

- *Biofeedback*
- *Ericksonian Hypnosis*
- *Emotional Freedom Therapy*
- *Eye Movement Desensitization Reprocessing*
- *Neurolinguistic Programing*
- *Sensory Motor Therapy*
- *Somatic Experiencing*

Psychodynamic Therapies

- *Adlerian Therapy*

Systemic and Collaborative Therapies

- *Dialogic Therapy*
- *Family Systems Theory*
- *Multi-systemic Therapy*
- *Narrative Therapy*
- *Solution Focused Therapy*
- *Strategic and Structural Therapies*

Answer: Yes No

The controlled act of psychotherapy is defined as: i) Treating, ii) by means of psychotherapy technique, iii) delivered through a therapeutic relationship, iv) an individual's serious disorder of thought, cognition, mood, emotional regulation, perception or memory that, v) may seriously impair the individual's judgement, insight, behaviour, communication or social functioning (*RHPA 1991*). All five elements of this definition must be present in order for the controlled act to have taken place.

In order to determine if you are performing the controlled act of psychotherapy, service providers must assess the seriousness of an individual's disorder and impairment. This includes an individual's disorder or impairment of thought, cognition, mood, emotional regulation, perception or memory that may seriously impair the client's judgement, insight, behaviour, communication or social functioning. Assessment is a process that is ongoing and issues that may require the controlled act are not always immediately identifiable. In making this assessment, service providers should consider the following:

- The client's subjective assessment of the level of seriousness of their condition.
- The clinician's subjective assessment of the level of seriousness of the client's condition.
- The assessment by another care provider of the level of seriousness of the client's condition.

Consider the above information to determine whether you are practicing the controlled act of psychotherapy, answer the following questions:

5) Are you using psychotherapy technique to treat a client's serious disorder of thought, cognition, mood, emotional regulation, perception or memory?

Answer: Yes No

6) Could your client's judgment, insight, behaviour, communication or social functioning be seriously impaired by the disorder referred to in question 5?

Answer: Yes No

7) Would you meet all of CRPOs entry-to-practice requirements including:

- Have you been awarded a master's degree in a program that has been approved by the Registration Committee or have successfully completed a program that the Registration Committee considers to be substantially equivalent?

Answer: Yes No

Answer Key

If you answered “yes” to question 1, you are most likely *not* working within the **scope of practice** of psychotherapy and *do not need to be registered* with one of the six colleges that are authorized to provide the **controlled act of psychotherapy**, even if these activities are provided to individuals with a serious disorder or impairment.

If you answered “yes” questions 2, 3 and 4, you are most likely working within the **scope of practice** of psychotherapy and should consider applying for registration with the College of Registered Psychotherapists of Ontario or one of the other five colleges whose members are authorized to provide the controlled act of psychotherapy.

A full description of CRPO’s [entry-to-practice requirements](#) and the [registration application](#) process is available on CRPO’s website.

If you answered “yes” to questions 5 and 6, then you are most likely performing the controlled act of psychotherapy and must be registered with one of the six colleges authorized to provide the controlled act.

If you answered “yes” to questions 2 through 6 but cannot answer “yes” to question 7 (related to entry-to practice requirements), you may need to restrict your practice in order to ensure that you are not engaged in unauthorized practice of the controlled act of psychotherapy.