

Briefing Note for Council

Meeting Date:	-
Agenda Item #	-
Issue:	Clinical Experience for Registration Policy
Attachment(s):	DRAFT Clinical Experience for Registration Policy
References:	March 1, 2019 Council Meeting Materials – see page 49 for Previous Draft Policy Definitions
For:	Information <input type="checkbox"/> Discussion <input type="checkbox"/> Decision <input checked="" type="checkbox"/>
Staff Contact:	S. Fraser
Submitted by:	Registration Committee

Purpose & Public Interest Rationale:

Council is asked to consider a revised policy on *Clinical Experience for Registration* for public consultation, which will clearly communicate in one document what is expected of the direct client contact and clinical supervision hours required by a registrant to transfer from Registered Psychotherapist (Qualifying) to Registered Psychotherapist (RP) and for RP independent practice.

The RP title communicates to the public that the registrant is experienced in psychotherapy. This policy ensures the hours accepted to transfer categories were within the scope of practice of psychotherapy and were appropriately supervised.

Background:

A draft clinical experience policy has previously been considered by Council because applicants/registrants are insufficiently informed of whether their clinical experience will fulfill registration requirements. Applicants/registrants may (and do) wrongly assume their hours will be counted and spend time in roles the College will not recognize which then necessitate Registration Committee (RC) panel and HPARB resources clarifying the acceptability of the experience after-the-fact.

At the January 31, 2019 RC plenary meeting, the Committee directed an amended policy be brought forward to Council for public consultation.

MOTION: Moved by S. Kawarsky, seconded by A. Benedetto

That the Registration recommend that Council circulate the Clinical Experience policy for public consultation, as amended.

CARRIED

At the March 1, 2019 Council meeting, Council concluded the draft policy was unclear and required more work.

After the feedback from Council, HPARB decisions concerning clinical experience, and decisions from the first regular route RC panels, staff questioned whether a policy was necessary and recommended that RC rely on current legislation and definitions to make decisions regarding clinical experience. At the April 25, 2019 RC plenary, the Committee agreed to inform Council they would review current policies and definitions and hold off on a clinical experience policy for the time being. Council was informed of this in the June 20, 2019 RC report to Council.

It should also be noted that at the November 7, 2019 RC plenary meeting, the Committee reviewed the group supervision policy, which allows up to 20% of regular route clinical supervision (i.e. a maximum of 30 hours, out of 150 total hours) to occur in groups of 9-12 supervisees. The Committee decided to change the policy to only allow group supervision with eight or fewer supervisees, effective April 1, 2022 so that sufficient notice could be provided to educational institutions, applicants, and registrants. This policy change is incorporated into the revised draft clinical experience policy.

MOTION RC-07NOV2019 – M04

That Registration Committee limit group supervision to eight or fewer supervisees, effective April 1, 2022.

Moved: M. Machan

Seconded: B. Locke Billingsley

CARRIED

At the April 23, 2020 RC plenary meeting, the Committee considered a revised clinical experience policy because staff and panels continue to review submitted clinical experience that is not developing the entry-to-practice competencies and is not adequately supervised. The Committee directed that the revised policy be brought forward to Council for public consultation.

MOTION RC-23APR2020 – M02

That Registration Committee recommend that Council circulate the Clinical Experience policy for public consultation, as presented.

Moved: G. Cockman

Seconded: D. Keast

CARRIED

Key Considerations:

Staff and panels have gained significantly more experience reviewing regular route clinical experience compared to when the policy was first considered.

The revised policy is more detailed than previous drafts and reflects how staff determine whether hours are accepted or referred to panel.

Recommendations:

Given the significant implications for CRPO stakeholders, the Registration Committee recommends circulation of the Clinical Experience for Registration Policy for a 60-day public consultation.

Implementation Date:

TBD

Proposed Motion:

[Be it moved] That Council approve the 60-day circulation of the Clinical Experience for Registration Policy as presented.

Type of policy: Registration	Approved by:
Date approved:	Review date:

DRAFT Clinical Experience for Registration Policy

Purpose

To protect the public, the College needs to ensure that Registered Psychotherapists have gained entry-to-practice competencies through supervised practice of psychotherapy. This policy clarifies what clinical experience the College considers adequate for acquiring and refining these competencies. Clinical experience refers to direct client contact (DCC) and clinical supervision. This policy should enable applicants and registrants to determine whether their clinical experience will be accepted for registration purposes.

Sources of Authority

Regulated Health Professions Act Code

Objects of College

3 (1) The College has the following objects:

2. To develop, establish and maintain standards of qualification for persons to be issued certificates of registration.

Psychotherapy Act

Scope of practice

3 The practice of psychotherapy is the assessment and treatment of cognitive, emotional or behavioural disturbances by psychotherapeutic means, delivered through a therapeutic relationship based primarily on verbal or non-verbal communication. 2007, c. 10, Sched. R, s. 3.

Authorized Act

4 In the course of engaging in the practice of psychotherapy, a member is authorized, subject to the terms, conditions and limitations imposed on his or her certificate of registration, to treat, by means of psychotherapy technique delivered through a therapeutic relationship, an individual's serious disorder of thought, cognition, mood, emotional regulation, perception or memory that may seriously impair the individual's judgement, insight, behaviour, communication or social functioning. 2007, c. 10, Sched. R, s. 4.

Registration Regulation

Definitions

1. In this Regulation,

“clinical supervision” refers to a professional relationship where the individual who is receiving supervision is engaged in a collaborative learning process with a clinical supervisor, which relationship is designed to,

- (a) promote the professional growth of the supervisee,
- (b) enhance the supervisee’s safe and effective use of the self in the therapeutic relationship,
- (c) foster discussion of the direction of therapy and the therapeutic relationship, and
- (d) safeguard the well-being of patients;

Registered Psychotherapist class, registration requirements

6. (1) Subject to section 7 and subsection 13 (2), the following are non-exemptible registration requirements for a Registered Psychotherapist certificate of registration:

3. The applicant must have successfully completed clinical experience in psychotherapy that includes at least 450 hours of direct patient [client] contact and at least 100 hours of clinical supervision where that clinical supervision relates to those hours of direct patient [client] contact.

(7) In order to qualify as clinical experience for the purposes of paragraph 3 of subsection (1), the hours of clinical experience must be undertaken subsequent to the applicant’s commencement of the program, education or training referred to in paragraph 1 of subsection (1).

Registered Psychotherapist class, conditions, etc., of certificate

8. (1) Every Registered Psychotherapist certificate of registration is subject to the following terms, conditions and limitations:

1. The member must practise psychotherapy with clinical supervision until such time that he or she,
 - i. has completed at least 1000 hours of direct patient contact; and
 - ii. has completed at least 150 hours of clinical supervision related to the 1000 hours of direct patient contact referred to in subparagraph i.

Policy

Clinical experience in psychotherapy, such as a placement completed in conjunction with education, employment, or volunteer positions, must meet the following criteria to be counted towards registration requirements for transferring from Registered Psychotherapist (Qualifying) to Registered Psychotherapist and for Registered Psychotherapist independent practice (i.e. practise without clinical supervision):

- Hours must take place after the applicant/registrant’s education program began. Hours completed before the education program accepted by the College to meet the education registration requirement will not be accepted.
- Clinical experience positions must fall within the scope of practice of psychotherapy, which includes both assessment and treatment. See the “Modalities of Psychotherapy” under Related Policies (below) for a list of prescribed therapies and modalities the College considers to be within the practice of psychotherapy.
- Clinical experience positions consisting primarily or exclusively of “Activities Outside the Controlled Act of Psychotherapy” will not be counted for registration. See the “Activities Outside the Controlled Act of Psychotherapy” under Related Policies (below) for a list of activities the College considers as outside the controlled act of psychotherapy.

- Registered Psychotherapist (Qualifying) Registrants shall receive clinical supervision regarding all clinical experience positions. That is, none of the clinical experience positions shall be unsupervised. Clinical supervision shall be spread evenly at an approximate ratio of 1 clinical supervision hour for every 4.5 DCC hours.
- Registered Psychotherapist Registrants without independent practice shall receive clinical supervision regarding all clinical experience positions. That is, none of the clinical experience positions shall be unsupervised. Clinical supervision shall be spread evenly at an approximate ratio of 1 clinical supervision hour for every 10 DCC hours.
- At least 50 out of 100 clinical supervision hours to transfer from Registered Psychotherapist (Qualifying) to Registered Psychotherapist shall be in individual/dyadic format. At least 25 of the remaining 50 clinical supervision to total 150 clinical supervision hours for Registered Psychotherapist independent practice shall be in individual/dyadic format. Until March 31, 2022, up to 20% of reported group supervision hours can be completed in groups of nine to 12 supervisees, provided the clinical supervisor attests that learning is promoted for all supervisees in the group. All remaining reported group supervision hours can include up to eight supervisees. Starting April 1, 2022, reported group supervision shall not include more than 8 supervisees.
- Clinical supervision must meet CRPO's definition of clinical supervision and be provided by an individual who meets CRPO's definition of a clinical supervisor at the time the supervision was provided.
- DCC must meet CRPO's definition of DCC.
- DCC must be confirmed in writing by an employer, educational institution, or clinical supervisor. Confirmation in writing from a professional colleague experienced in psychotherapy may be considered in exceptional circumstances.
- Clinical supervision must be confirmed in writing by a clinical supervisor or educational institution. Confirmation in writing from a professional colleague experienced in psychotherapy may be considered in exceptional circumstances.
- Clinical supervision hours must be in relation to DCC hours that are accepted by the College.
- If clinical supervision hours for a clinical experience position are not accepted, any corresponding DCC hours that occurred after the registrant's registration date will not be accepted.
- There must be reasonable grounds that support the applicant/registrant practises in a safe and professional manner.

Related Policies and Definitions

[Modalities of Psychotherapy](#)

[Activities Outside the Controlled Act of Psychotherapy](#)

[Definitions](#)