



The Partnership of Registered Psychotherapist Associations

PRPA Members
2019

*Canadian Art Therapy
Association (CATA)*

*The Canadian Association for
Psychodynamic Therapy
(CAPT)*

*Canadian Association for
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*Canadian Counselling and
Psychotherapy Association
(CCPA)*

*Canadian Humanistic and
Transpersonal Association
(CHATA)*

*Music Therapy Association of
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*Ontario Art Therapy
Association (OATA)*

*Ontario Association for
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(OAMFT)*

*Ontario Association Mental
Health Professionals
(OAMHP)*

*Ontario Expressive Arts
Therapy Association
(OEATA)*

*Ontario Society of Registered
Psychotherapists (OSRP)*

*Professional Association of
Christian Counsellors and
Psychotherapists (PACCP)*

December 4, 2019

Deborah Adams
Registrar

The College of Registered Psychotherapists of Ontario (CRPO)
375 University Avenue, suite 803
Toronto, ON M5G 2J5

By-law: Posting Registration History on the Public Register for late-payment of fees

Dear Ms. Adams,

The Partnership of Registered Psychotherapist Associations (PRPA) is glad to have a second opportunity to respond to this by-law consultation.

We truly appreciate that you've taken into account feedback from stakeholders and modified the by-law to be less punitive by allowing for the posting of a suspension to be taken off the Public Register after one year. Thanks for listening.

We are pleased that you consider that this is an "administrative" matter regarding an RP's status with the College and that it should be treated differently than a matter of professional misconduct.

However, in treating late payment of fees as an administrative matter, we strongly feel that CRPO should go further by removing the notice of suspension as soon as fees are paid up and RP status is reinstated. Our association members are giving us feedback that having one's name on the Public Register is a serious and humiliating experience. It not only affects their current therapist-client relationships, it jeopardizes their livelihood. And in the case of late-payment of fees it is a punitive way to make something public that should preferably stay between College and registrant.

We feel that CRPO can take care of late-payment of fees internally rather than using the Public Register as a forum for discipline or deterrence.

Here are our questions and recommendations:

If we understand this correctly, there are four conditions in the current by-law for removal of a notation on the Public Register regarding late-payment of fees. 1. Paying the late fees including penalty. 2. Having no other suspension save for non-payment of fees. 3. The

registrant has held continuous College membership for the immediate past 12 months.
4. The registrant files a request with CRPO to remove the notation. We agree with #1 and #2.

Our first question is – in whose interest is it to leave a suspension notice on the Public Register for any length of time once the RP returns to paid-up member status? i.e. The registrant need not have to have held continuous College membership for the immediate past 12 months. Instead, we believe this should depend on the registrant’s reason for the late-payment. If there is no intention to defraud the system, such as dealing with a health or family crisis or technical issues, then the registrant should automatically be reinstated once fees are paid up including a late-payment penalty.

At this point, the suspension notice should be taken down right away. It would be unnecessarily punitive to leave the suspension notice up for any further length of time. Ethically-speaking, there was no intention to practice under false pretences.

In fact, instead of protecting the public, continuing to publish the suspension may unduly deprive the public of access to that registrant’s services as a result of calling into question the RP’s reputation. Not just the “public at large” but especially the clients of that therapist who count on his/her/their therapeutic services.

We recognize CRPO’s fine line to navigate between public protection and public access to psychotherapy services. We ask you to think carefully in this situation about the balance between public protection and public access. Over-penalisation for a late-fee payment that is considered an administrative issue, may deprive a client of their therapist.

RPs’ experience regarding the posting of their name on the Public Register is a serious and humiliating matter. It can potentially end a career. RPs are foremost committed to their clients and late-payment of fees to the College seems unrelated to how we commit to an ethical practice in how we help our clients.

Given that the CRPO puts a huge effort into granting registered status to a psychotherapist, we trust that you put the same effort into calling that status into question. This must require nuanced criteria and decision-making. Given that the core of this field is a psychotherapeutic relationship, there is definitely more nuance than usual in balancing public protection with public benefit.

In cases where an RP fails repeatedly to pay their fees on time or appears to have ulterior motives to delay payment of fees, this may warrant auditing of that registrant’s practice and potentially lead to a finding of a more serious ethical breach. This may in turn lead to an in depth investigation of a pattern of late-payment of fees and may indeed protect the public from using a therapist who has violated ethical standards.

We agree that CRPO’s role is to protect the public in matters of ethical violation between therapist and client and hope you’ll reconsider this By-Law as outside of an ethical violation that needs public protection and treat it as an internal matter between CRPO and its registrants.

There is one other clause that we ask you to reconsider, which is that a suspended member has to file a request in the form provided by the Registrar to have their suspension notation

removed from the Public Register. Can you explain CRPO's rationale for this part of the by-law? Without further explanation, we believe that this step serves no one. It seems to create unnecessary paperwork for both the registrant and CRPO staff with no obvious benefit behind it. We therefore recommend that CRPO automatically remove a notice from the Public Register once a registrant is returned to "good standing" so as not to create needless administrative steps for all concerned.

We trust that you will once again take into account the opinions of RPs as you go into the next round of deliberation on this By-Law. (Not just our letter, but all those who've responded via the Survey Monkey.)

We agree in principle with Regulation and hope that we as RP associations can work with the College in coming up with by-laws that deliver the best balance between protection and access in the best interests of providing people with excellent mental health services. There is a lot of nuance still to be worked out as the College and Associations evolve in our relatively young relationship.

Thank you for inviting this dialogue which is hopefully to be continued.

Respectfully submitted,



Claire Watson

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