

From: Tony DeBono <tdebono@cpo.on.ca>

Sent: April 29, 2024 8:41 AM

To: Glasberg, Irwin (MLITSD) <Irwin.Glasberg@ontario.ca>

Subject: Re: Concerns with the OFC Assessment Report

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Good morning Mr. Glasberg,

In follow-up to my message and your report, I would like to invite you and your team to a College Council meeting for you to inform the Council of your assessment of the College. The Council is well-informed on the data that was collected over the course of a year with respect to the risks of the Master's class; none of which was cited in your report despite citing the issue and the Council meeting where the report was discussed. If we are to have a discussion about this matter, we request that it is data-driven and not ideological in nature. We will be prepared to re-share our findings with the public in Council.

Upcoming meetings are held in June and September. I will need to coordinate timing, but should you have a preference, please let me know.

I would also like to schedule a follow-up meeting with you, so that we can have a one-to-one, if possible. I believe that Ontario consumers require more transparency regarding the registration requirements of their mental health professionals. In my conversations with the public, they are shocked to hear what their loved ones are receiving and that the government is permitting such practices. [REDACTED]

[REDACTED]

Regards,
Tony

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Regulating Psychologists and Psychological Associates



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From: Tony DeBono

Sent: Saturday, April 27, 2024 10:28 AM

To: Glasberg, Irwin (MLITSD) <Irwin.Glasberg@ontario.ca>

Subject: Concerns with the OFC Assessment Report

Dear Mr. Glasberg,

Thank you for your office's report that was sent to the College on April 26, 2024. May I please request that your team read the College's Master's Closure report? I continue to remain concerned about the OFC's preconceived negative biases regarding the regulation of psychology and the impact on fairness. The "first impressions" below from the OFC's report do not appear to be grounded in evidence, but rather opinion. The College has provided the public with significant data on this issue (including the significantly different HPARB appeals rate between Master's and Doctoral applicants), which was not cited in the OFC's report despite referencing the relevant Council meeting.

I continue to remain concerned about partial, unfair "impressions" of the College by your office. I welcome data-driven discussion about this topic.

Before leaving this discussion, we wish to note that, on March 21, 2024, CPO's council passed a recommendation to pursue amendments to its registration regulation to discontinue master's level registration. The recommended amendments would need to be endorsed by the Ontario Ministry of Health.

On first impression, this approach could create barriers to registration for both domestic and internationally trained psychologists. In addition, the implementation of this proposal would represent a major change to registration practices, which is an additional risk factor identified in the OFC's framework. As this proposal is considered, we would welcome further dialogue with the college.

Sincerely,

Tony

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From: Tony DeBono
To: Glasberg, Irwin (MLITSD)
Subject: My Preliminary Response to the OFC Assessment
Date: April 30, 2024 1:58:26 PM
Attachments: Outlook-th53lm5.png
Outlook-z5v4hryv
Outlook-i2wmuhnd
Outlook-lljownpb

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Dear Mr. Glasberg,

RE: Risk Rating for the College of Psychologists of Ontario

I thank you, Mr. Glasberg, and your office for the Risk Rating report provided on April 26, 2024. I must note, however, that I have significant concerns with the nature of the OFC's assessment, and the appearance of bias in specifically not citing quantitative and qualitative data that were collected and made available to both the public and the OFC prior to the release of your report. I will venture to provide preliminary responses to specific areas of concern regarding the OFC's assessment, which I hope to discuss with you in the future. I will prepare a formal note to follow.

Based on the Canadian Occupational Projection System (COPS), the projected supply and demand situation for the psychology profession between 2022 and 2031 is described as "shortage."1 The OFC appreciates that there are different views on whether the origins of this problem involve an actual shortage of mental health professionals, the unequal distribution of practitioners across the province and / or a preference for many practitioners to work in private practice, as opposed to institutional settings, or a combination of these considerations.

I will note that the use of a projection system is not a substitute for a comprehensive economic analysis and can lead to misinterpretation of data, and inaccurate recommendations. An economic analysis requires a review of the macroeconomic and microeconomic factors that impact the economy, including labour market trends (e.g. private vs public incentives), market substitutes, and market stratification, amongst others. Within public organizations and private practices, there are economic forces to consider, such as the ratio of workload demands to level of compensation in the public setting. The use of a projection system, although helpful when combined with other sources of data, when used in the fashion of the OFC can prove to be problematic.

Within the Master's Closure report that was available to the OFC but not cited, the College demonstrated the following actual labour data:

- Setting with the greatest number of Doctoral & Master's registrants = private practice (solo and group practices; n = 2901 for Doctoral; n = 591 for Master's).
- Despite opinion, there are more Doctoral level psychology professionals than Master's level in high-needs areas such as the Education system (n = 424 vs n = 340) & Corrections (n = 80 vs n = 23)

As per the College's Master's Closure report, the Ontario Psychological Association (OPA) historically recommended the fees that private practitioners could charge the public per hour of service. There are presently no differences in the fees between Master's and Doctoral registrants, with a mean range of \$212/hour to \$239/hour and no fee ceiling (i.e. no formal cap on what psychologists can charge).

The OFC appreciates that there are different views on whether the origins of this problem involve an actual shortage of mental health professionals, the unequal distribution of practitioners across the province and / or a preference for many practitioners to work in private practice, as opposed to institutional settings, or a combination of these considerations.

This is false, or at a minimum misleading, as it is not merely a “different view.” This is the actual data of the distribution of professional psychologists across the public and the private sectors in Ontario. The College should not be blamed for a public market that is not competitive in relation to the private sector. Not a single mention in the report. The OFC's opinion appears not to have shifted despite evidence that does not support their conclusions.

For example, the college's requirement for all candidates for licensure as psychologists to possess PhDs, while undoubtedly raising the academic credentials of applicants, may also disqualify worthy candidates. Similarly, the college's policy to not permit internationally trained candidates with doctoral degrees to remediate any gaps in their training, and to require that they retake their degrees, also serves as a barrier to registration.

I strongly refute this point. Over approximately a year, I conducted semi-structured interviews with 15 Directors of Clinical Training of professional psychology programs across Ontario. They overwhelmingly indicated that they did not train students to have the competencies to become independent psychology professionals at the Master's level. This means that those who leave at the Master's level are not exiting their programs because they have attained the necessary competencies for safe practice. In fact, this means that the Ontario consumer may receive care from an individual who prematurely left a training program and was able to become registered through an unaccredited approach to acquiring the knowledge, skill, and judgement for safe practice. This is largely unbeknownst to the public. It is clear that the professional psychology programs are not training professionals to treat the Ontario public at the Master's level, but the OFC failed to cite any of these concerns.

The OFC notes that other regulators of the psychology profession in Canada and internationally have taken more flexible approaches to these issues which the college may wish to consider. The statement above is an example of selection bias. This is not a balanced representation of the state of psychology. Although it is true that Alberta registers those at the Master's level, you failed to indicate that the CPA solely accredits doctoral programs and the ACPRO Canadian standard is the Doctoral degree. Alberta is the outlier, but there is no mention of every other province. A data point was selected to confirm a particular narrative at the exclusion of other data not consistent with the bias. In the United States, any discussion of potential Master's accreditation is accompanied by a **different scope of practice and title between Master's and Doctoral practitioners**. Certainly not the state of affairs in Canada.

In addition, the college currently mandates that all internationally trained applicants complete 1,500 hours of supervised practice hours in Ontario under the oversight of an experienced CPO member. This requirement often negates years of clinical experience that the candidates have obtained in their home jurisdictions, while imposing heavy financial burdens

Although the College is interested in improving the experience of registering newcomers to Ontario, this statement is particularly concerning, given the lack of appreciation of the high-level of variability of psychological practice globally. This requirement does not negate experience, nor does it prevent professionals from entering the workforce during this time. We perceive this as a much-needed mentorship and preparatory period to ensure safe practice of the profession based on the standard in Ontario. Supervised Practice does not prohibit joining the labour market.

The OFC recently undertook an analysis of the number and pattern of appeals that CPO applicants had filed with HPARB over the 2021-23 time-period. This review found that there were 14 appeals in total. In three of these cases, (21%), HPARB returned the original decision to the college for reconsideration.

Again, it is of concern to me that despite the availability of data, the OFC failed to cite valuable information to clarify the pattern of HPARB decisions. It is not clear to me where the OFC obtained 14 appeals in total over the 2021-2023 period. In your annual report, you note the following, with 18 appeals: *High number of appeals (18) that applicants have filed with the Health Professions Appeal and Review Board (HPARB) over the last three years, with HPARB sending eight of these back to CPO for further review.* Hence, it will be helpful to explain this discrepancy in raw numbers, especially given that this was a flag regarding the College's fairness.

There is a significant difference between Master's and Doctoral HPARB appeals rates, which were not disclosed (9-15% vs 0-2%). This is a biased approach to presenting data, and something that I have already flagged as a concern. Furthermore, of the HPARB registration appeals in 2022, half of the cases (nine of the eighteen) were of applicants who were also registered with the CRPO. Is this truly a loss in the labour supply? Why is this not also cited by the OFC?

Based on statistics that the OFC has reviewed, and discussions with CPO officials, there is a consensus that there are gaps in supply of racialized and Indigenous psychologists in Ontario, coupled with access to care concerns for racialized populations.

Although the College is committed to increasing diversity, I have also been clear on concerns with the transparency and quality of data collection by the OFC, particularly by those who are not registrants of the profession and who may be in a real or perceived conflict of interest. I would like the OFC to cite their statistics (and their sources) so that they can be reviewed, accordingly.

Ultimately, I am both disappointed and concerned with the OFC's assessment in terms of its partiality, low level of fairness, and reliance on opinion. It is particularly disappointing that although the Council meeting where the Master's Closure Briefing Note was discussed and provided to the public, not a single statistic was cited despite the following statement:

Before leaving this discussion, we wish to note that, on March 21, 2024, CPO's council passed a recommendation to pursue amendments to its registration regulation to discontinue master's level registration. The recommended amendments would need to be endorsed by the Ontario Ministry of Health.

On first impression, this approach could create barriers to registration for both domestic and internationally trained psychologists. In addition, the implementation of this proposal would represent a major change to registration practices, which is an additional risk factor identified in the OFC's framework. As this proposal is considered, we would welcome further dialogue with the college.

After a year of research, the OFC did not even acknowledge the work that was conducted to ensure that decisions were data-driven, and in the public interest. I will continue to make public protection concerns clear with respect to the devaluation and lack of registration standards of mental health and addictions

professionals in Ontario. The Ontario public has a right to be aware of the qualifications and competencies of their providers, and I firmly believe that the current state and the pressured future state will not add to the mandates of quality and safety for the Ontario public.

Lastly, it is disappointing that the OFC did not acknowledge that through a collaborative relationship with British Columbia we will be working together to pool our health human resource supply to expand overall capacity across provinces. This will increase capacity by up to 1,400 registrants, almost double that of the Master's cohort. Not a single mention.

I reiterate my significant concerns with bias and a preconceived narrative of the College that will not respond to data.

I am looking forward to you joining an upcoming College Council meeting to speak directly with the professional and public members who voted on this important strategic initiative and to speak to the criticisms of the College.

Sincerely,
Tony

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