

WHITE PAPER

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MARCH 2024 COUNCIL MEETING

CLOSURE OF MASTER'S LEVEL REGISTRATION REPORT

STRATEGIC DIRECTION REFLECTION

Innovation in Regulation

MOTION FOR CONSIDERATION

That the Council approve the submission of the Master's Level Registration Report to the Ministry of Health.

Moved by TBD

PUBLIC INTEREST RATIONALE

To ensure that the College's registration practices, particularly as they relate to Master's-prepared applicants, support public protection, the public interest, and the College's vision for excellence in care.

SUMMARY

The Council's motion to close Master's-level registration is substantiated by the overwhelming majority of professional psychology graduate programs in Ontario not providing terminal Master's degrees or having the intention of training autonomous psychological practitioners at the Master's-level. The Doctoral period of study serves a crucial safety function to ensure that only competent and ethical trainees graduate from their programs. Doctoral programs also serve as a quality control function as the gatekeeper for trainees to acquire the knowledge, skill, and clinical judgement to perform professional activities safely, ethically, and competently. In the mandate of public protection, the Council's motion to close Master's registration would be in alignment with Canadian Psychological Association-accreditation standards of Doctoral programs.

This alignment between regulator, accreditation body, and training programs is important for quality care, client safety, and the public's trust in the profession. Master's-level candidates have their applications rejected and then appealed to the Health Profession Appeal and Review Board (HPARB) substantially more often than Doctoral candidates (without having decisions overturned), resulting in significant financial costs and operational backlogs to the College. A review of 2022 HPARB patterns revealed that half of the applicants who were rejected became registered with the College of Psychotherapists of Ontario, suggesting a more suitable regulatory body for their training. Decisions from the Inquiries, Complaints, and Reports Committee were examined and appeared similar between education levels but should be interpreted with caution due to small and/or unequal sample sizes.

In addition to the decision surrounding the closure of the Master's route to initial registration, the ambiguity of the title *Psychologist* poses a significant risk to the public, as it currently lacks transparency with respect to the education level of Psychologists. Doctoral vs Master's-level Psychologists should be clearly delineated by ensuring that the level of training is explicitly noted in the registrant's title. This will serve to clarify the identity of the profession to the Ontario public and will align with the training provided by the majority of graduate programs in the province.

Closure Of Master's Level Registration Report

INTRODUCTION

The mandate of this project was to examine the current educational landscape of Master's-level professional psychology training in Ontario and to review available College data to inform the decision of the Council to close registration at the Master's-level. The College thanks Dr. Paula Garshowitz for her preliminary work on this project. A brief history on the topic of Master's-level registration in Ontario can be found in Appendix A.

In order to provide the Council with current information regarding the training landscape of professional psychology, individual meetings were held with the Directors of Clinical Training (DCTs) of each graduate psychology program in Ontario that is accredited by the Canadian Psychological Association (CPA) as well as Laurentian University (Master's-level applied psychology). Private institutions that are for-profit were not included in this review. Accreditation serves an important quality control function, as professional graduate programs who are CPA-accredited must adhere to specific standards and these programs are reviewed on a regular cycle, ensuring high quality training for future registrants (similar to the Royal College of Physicians and Surgeons of Canada's Accreditation standards). Master's programs are not accredited and, thus, there is significant variability in applicants with degrees ranging from Divinity to Education, all seeking registration as practitioners of psychology.

METHOD AND RESULTS

Data were gathered from the College's database and through semi-structured interviews with DCTs. All DCTs were asked the same questions regarding their training programs to ensure consistency in data collection (see Appendix B). Out of the 15 DCTs interviewed, only one doctoral program indicated that their program was designed to confer a terminal Master's degree in school psychology. Laurentian University confers solely Master's-level psychology degrees and lack of accreditation of the program was noted. Although the majority of Doctoral programs conferred a Master's degree, they all definitively indicated that their training programs were not designed to prepare independent psychology professionals at the Master's-level, but rather, the Master's degree was conceptualized as a stage in the developmental training process leading to the Doctoral degree marked by several years of additional learning to further develop the knowledge, skill, and clinical judgement of trainees.

Less than half of the programs provided the required graduate coursework for registration with the College at the Master's-level and programs noted that more advanced courses were offered at the Doctoral-level. Without standardized education curricula, there is variability in the availability of required courses at the Master's-level for registration with the College. For example, some programs provide psychotherapy training at the Doctoral-level, creating gaps in the core educational experiences expected of candidates for registration with the College. This is particularly problematic from a client safety perspective, as psychotherapy has been deemed a controlled act in Ontario (under specific circumstances) due to the risk of harm to the public. With respect to clinical training, less than half of DCTs indicated that they offered clinical practice at the Master's-level that would prepare students in the required competencies of assessment and intervention. Importantly, the clinical training was described as generally introductory in nature. Irrespective of the course offerings or clinical training provided at the Master's-level, Doctoral program DCTs clearly indicated that they do not train independent psychology professionals at the Master's-level.

When DCTs were asked how many of their students received their Master's degree and subsequently

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registered as Psychological Associates with the College, the consensus was that very few students did not proceed to a Doctoral degree. DCTs indicated that a very small minority of students (e.g., 1 to 2 students), to their knowledge, had pursued registration at the Master's-level and that this was "rare," "unusual" or that it did not occur in their program. When students did not pursue a Doctoral degree, it was reported to be a result of a multitude of factors including, the program not permitting the student to continue due to academic and/or professionalism concerns as well as personal decisions made by the trainee. The transition from the Master's to the Doctoral program serves an important safety function, such that programs are able to decline transition if there are quality concerns with the student. Being able to observe a student's professional development over the course of several years (which is possible with the combined Master's to Doctoral experience), provides faculty with substantial information about a student's level of competence, ethical conduct, and professionalism.

The data from DCTs overwhelmingly indicates that the public educational landscape of professional psychology in Ontario has evolved to train students with the expectation that they will practice at the Doctoral level. Ultimately, there has been an evolution in the field since the proclamation of the Regulated Health Professions Act (1991) and training programs reflect this change to the expected standard of entry to the profession.

Qualitative Comments and Themes from the Interviews

- *Our program is not designed to train autonomous providers at the Master's-level.*
- *The Master's program is not designed as a terminal program leading to autonomous practice.*
- *In rare circumstances a student who is struggling in the PhD program may be granted an MA if they choose to withdraw from the program*
- *We are always looking to pack more opportunities into the PhD – not enough time.*
- *Care about integrity of training and the scaffolding provided from Master's to Doctoral degree.*
- *Practicum in Master's might only be in assessment, not therapy.*
- *Concerns with level of training at Master's-level*
- *Careful oversight across the training from Master's to Doctoral – this is missing if candidate terminates their training after the Master's degree.*
- *Concerns regarding case formulation, synthesis of data, research skills, and critically evaluating the technical properties of psychometrics.*
- *4-years of supervision for Psychological Associates not equivalent to doctoral training*
- *Intentionally a sequential program with PhD – integrated training program*
- *Specialized Courses at PhD and advanced practica*
- *More advanced skills are in PhD.*
- *Reasons not to proceed to PhD: if research skill difficulty/missing deadlines is identified (not a guaranteed entry to PhD, if problems or concerns identified by faculty; sometimes not a clear reason why they opt not to continue to PhD*
- *Concern: no level of accreditation for Master's programs*

Appeals Following the Rejection of Applications

A review of cases that were appealed to the Health Profession Appeal and Review Board (HPARB) over the past five years revealed that Master's applicants are deemed not qualified for entry to the profession in considerably greater numbers than Doctoral applicants (Exhibit 1). This finding is despite the fact that there are significantly fewer Master's applicants to the profession in general. HPARB decisions regarding these registration matters over the last five years have either upheld the College Registration Committee's decision or an application was sent back to the College for further review. Following further review by the College, no registration decision in these cases (including refusal) has

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been overturned by HPARB (due to the ongoing nature of HPARB appeals, there continues to be HPARB cases in process).

Exhibit 1: HPARB Appeals by Education Level

	Appeals Master's Applicants	Appeals Doctoral Applicants	Total Master's Applicants	Total Doctoral Applicants
2017	7	0	77	122
2018	10	1	66	131
2019	13	2	98	120
2020	12	3	103	159
2021	9	3	94	147

Membership Data – What Does it Mean to be a Master's-level Registrant?

To better understand the current state of the College with respect to Master's registrants, a review of the highest degree of membership was conducted which suggested significant variability in the Master's class. Although the issue of restricted titles is distinguishable from registration standards, these concepts overlap, especially when considering the public's understanding of a profession (a title implies a level of training and expertise for consumers). The introduction of the Agreement on Internal Trade (AIT; now the Canadian Free Trade Agreement, CFTA) has resulted in a lack of clarity to the public when choosing a Master's-level registrant for their care.

Historically, the title of "Psychologist" in Ontario was reserved for Doctoral-level registrants. All registrants at the Master's-level in Ontario received the title of "Psychological Associate." Both titles have the same scope of practice. With the CFTA, when registrants in jurisdictions that grant the title of "Psychologist" at the Master's-level seek registration in Ontario, those individuals must be given the title of "Psychologist". This has created a trend of "registration tourism" where members of the College of Psychologists of Ontario who are registered as "Psychological Associates" are seeking additional registration in a jurisdiction that would provide them the title of "Psychologist" and then "returning to Ontario" with this new title without any new competence. This has occurred in situations where there was no physical change of residency, so individuals did not need to "return to Ontario" physically.

This development creates confusion for the public as Master's-level practitioners might be called Psychological Associates, whereas others might be called Psychologists without any additional competence. The value proposition of Master's-level registrants obtaining the title of "Psychologist" in lieu of "Psychological Associate" is solely for the benefit of the registrant, not the public. The public may not have the knowledge to research their psychological care provider to determine whether they are Master's or Doctoral trained, but the title of "Psychologist" confers a greater perception of legitimacy. To demonstrate the value proposition of the title "Psychologist," as of June 2022, 329 Master's-level registrants who were initially registered as Psychological Associates in Ontario have become registered in other jurisdictions as "Psychologists" and have returned to Ontario with this title. From July 1, 2022, to April 19, 2023, there were an additional 19 Master's-level registrants who have changed their titles through the CFTA.

The distinction between clinical psychology and psychotherapy is an important one. Clinical psychologists use psychotherapy as one type of intervention within their greater skillset, whereas psychotherapists do not have the same breadth of assessment skills or the ability to diagnose conditions. The hallmark of clinical psychology is the integration of science with practice. When working with the public, this means that clinical psychologists are trained to interpret research, to

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administer evidence-based psychological instruments (such as standardized tests), and to integrate this knowledge to formulate personalized treatment plans for their clients. Psychotherapy is one intervention that psychologists may leverage to care for their clients. Thus, although psychotherapy is an intervention within the scope of practice of clinical psychology, the profession of psychology requires additional skills beyond that of the psychotherapist.

In addition to the practice of clinical psychology in Ontario, registered psychologists practice in the areas of Clinical Neuropsychology, Forensic/Correctional Psychology, School Psychology, Health Psychology, Rehabilitation Psychology, Counselling Psychology, and Industrial/Organizational Psychology. A unifying hallmark of all psychology practice is the ability to integrate research evidence with professional practice to provide the most helpful recommendations to the public, including evidence-based psychological interventions. Professional psychology's service to the public good has been to provide a scientific approach to understanding human behaviour in a sector impacted by pseudo-science that can exploit vulnerable clients and create harm to the public¹.

Individuals with Master's degrees in psychology have a regulator with whom they can consider registering, the College of Registered Psychotherapists of Ontario (CRPO). In fact, a number of Master's-level registrants are now dually registered with the CRPO, suggesting that their level of psychology training makes them suitable to become a psychotherapist and provides an avenue for Master's-trained psychology graduates. 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. This suggests redundancy in some Master's-level applicants, as these individuals either apply to both the CRPO and CPO concurrently, are already registered with the CRPO when they apply to the CPO, or they become registered with the CRPO after finding that they are not eligible to register with the CPO.

As presented in Exhibit 2, the number of Master's-level "Psychologists" (408) have now surpassed "Psychological Associates" (311) even though candidates for initial registration in Ontario with a Master's degree must undergo the Psychological Associate route. When comparing Master's-level Psychologists who are transitioning their practice to Ontario from another Canadian jurisdiction through the Interim Autonomous Practice route, they are similar in numbers to Psychological Associate supervised practice registrants (37 vs. 48, respectively). This pattern suggests a similar pace of new Master's-level Psychologists and Psychological Associates joining the College, further complicating the profession's public identity. That is, when members of the public are choosing their Psychologist, they may not be aware of their academic credentials and the heterogeneity of training within the title of "Psychologist." It may be argued that the College is insufficiently transparent to the public in terms of the qualifications of the providers of their psychological care, both in the public and fee-for-service systems.

¹ See Lilienfeld, S. O. (2007). Psychological Treatments That Cause Harm. *Perspectives on Psychological Science*, 2(1), 53-70.
<https://doi.org/10.1111/j.1745-6916.2007.00029.x>

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Exhibit 2: 2022 Membership Data (Autonomous, Interim Autonomous, Supervised Practice)

Degree	Title	Degree Total
Master's	C.Psych.	408
Master's	C.Psych. (Interim Autonomous Practice)	37
Master's	C.Psych.Assoc.	311
Master's	C.Psych.Assoc. (Supervised Practice)	48
Doctoral	C.Psych.	3190
Doctoral	C.Psych. (Interim Autonomous Practice)	58
Doctoral	C.Psych. (Supervised Practice)	127

A member snapshot from the May 31, 2022, annual report revealed the following registration pattern:

- 4736 total active members (across all certificates)
- Master's Psychologists account for 9.4% of all registrants
- Psychological Associates account for 7.6% of all registrants
- All Master's-level registrants account for 17% of the total membership

Complaints Data

In order to examine whether there were differences in the proportion of Master's and Doctoral registrants who were referred to the Inquiries, Complaints, and Reports Committee (ICRC), a scan of decision patterns from the 1980s to the 2020s was conducted. Importantly, the percentage of Master's-level registrants varied across time-periods (see Appendix A for a brief history). Although there did not appear to be qualitative differences between Master's and Doctoral registrants, statistical analyses were inhibited by small and/or unequal sample sizes. In general, complaints that resulted in undertakings or discipline were based on a small minority of registrants, particularly over a timespan that was several decades long. Thus, conclusions from these data should be made with caution given those caveats in mind.

Where do Registrants Practice?

Psychology professionals practice across a diverse range of settings. A common argument against the closure of the Master's route to registration is that some practice settings and priority populations will be disproportionately, negatively impacted, particularly in the areas of Education and Corrections. The data, however, suggested that the setting with the greatest number of both Doctoral and Master's registrants was private practice (solo and group practices; $n = 2901$ for Doctoral; $n = 591$ for Master's). In terms of raw numbers of registrants in the Education system, there were more Doctoral than Master's registrants ($n = 424$ vs $n = 340$). The pattern for psychology professionals within the Corrections system is similar with Doctoral registrants outnumbering Master's registrants ($n = 80$ vs $n = 23$). Therefore, although the proportion of Master's level registrants who serve clients within the Education and Corrections systems may be higher than that of Doctoral registrants, the actual number of service providers within these contexts is higher among those with Doctoral degrees. An important factor to consider in the interpretation of these data is that 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). As per the OPA's email to the membership on December 12, 2022, no distinction is made between Master's and Doctoral members:

...What is the difference between the reported fee range as opposed to the previous 2013 OPA recommended fee?

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The OPA is not providing nor publishing a 'recommended' fee rate. Our reasoning remains the same as announced in the spring. The reported fee range provides the actual current range for psychological treatment. In addition, we have provided the mean by specific regions.

Am I allowed to charge clients more than the range within this year's reported fee range?

Yes, this has always been the case. The reported fee range provided by the OPA does not have any bearing on what members are ultimately able to charge for their services. Those factors, as determined by the survey, are influenced by a multitude of various factors.

Psychologists must always inform clients of their rate upfront before service delivery and receive consent from their clients regarding what their agreed rate for service delivery is. The rate for service should be documented in the consent process, accordingly...

Therefore, the greatest number of Master's registrants are in the private marketplace, as it is significantly more profitable than within the public sector, in addition to a range of other factors of consideration (e.g., having one's own hours, not reporting to a manager, etc.). Master's registrants who change their title to Psychologist through the CFTA are more marketable within the private sector due to the greater brand recognition of the title "Psychologist" vs "Psychological Associate," on which the public may make a decision about their choice of service provider. There is a lack of evidence to suggest that the closure of the Master's class of registration would result in fewer psychology professionals to work in the Education or Corrections sectors. It appears that the private practice setting is the most popular context for Master's-level registrants.

CONCLUSION

Considering the College's mandate to protect the public interest, there are aspects of the Master's class that have the risk to cause harm, particularly with respect to the heterogeneity of applicants' academic backgrounds as well as a lack of clarity of title. Overall, there is evidence, at this time, to support the Council's motion to close Master's-level registration.

Risk of Harm: When a regulatory College submits regulation amendments to the Ministry of Health for approval, the College must provide an explanation of how the proposed regulation is in keeping with the RHPA (1991) and the public interest. The College is asked to explain how the change will benefit or protect the public and must identify the risk(s) to the public if the amendment is not passed. To close a Class of Certificate of Registration, the College must demonstrate that the public is at risk of harm from those individuals registered with that class of Certificate of Registration. It is concerning that accredited training programs of professional psychologists in Ontario do not train students for registration at the Master's-level. The lack of standardized curricula at the Master's-level creates variability in training experiences. For example, some programs provide psychotherapy training and more advanced assessment skills required for independent practice solely at the Doctoral-level, creating gaps in the core educational experiences expected of candidates for registration with the College. This is particularly relevant from a public protection perspective, as the communication of a diagnosis and the practice of psychotherapy are controlled acts in Ontario given the potential for harm if not conducted competently. Both controlled acts require knowledge, skill, and clinical judgement which develop through a combination of formal coursework and supervised clinical experiences. This suggests that applicants are attempting to enter the profession with variable academic backgrounds despite the fact that Psychology is a specific academic discipline and science, in addition to being a regulated health profession. At its core, the profession of psychology requires the independent ability to integrate science with practice. It is unlikely that the general public is aware of the significant educational differences between psychology professionals using the title "Psychologist." This lack of

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transparency is not in the best interests of the public.

The Psychological Associate certificate was created to provide clarity to the public between Master's and Doctoral registrants. With the rise in "registration tourism," the title of Psychological Associate has lost significance and has been surpassed by the title of Psychologist. This creates a lack of clarity for the public and can erode public trust in the profession. Although ICRC decisions were similar when accounting for proportional differences between Master's and Doctoral registrants, HPARB data would suggest that the registration of Master's applicants creates significant financial and operational pressure on the College, which ultimately impacts the College's ability to serve and protect the public. Additionally, a number of applicants to the College are already registered with the CRPO (or eligible to apply).

A significant risk to the public is in the lack of clarity and transparency of titles and scopes of practice. It is in the public interest to provide clarity regarding a profession's title(s). For example, in the province of Ontario, both Registered Nurses (RNs) and Registered Practical Nurses (RPNs) can use the title "Nurse." However, when introducing themselves to the public, they must describe their specific title, as the current entry academic standard for RPNs is a College diploma whereas for RNs it is the baccalaureate degree, and there are differences in the scopes of practice between RPN and RN-level nursing practice. As per their Code of Conduct, "3.1 Nurses identify themselves to clients consistent with CNO's public register, using their name, title (RN, RPN, NP) and their role within the health care team. Although these professionals are all "nurses" by general title, they have distinct training experiences and scopes of practice. Thus, the people of Ontario would benefit from clearer delineation between Master's and Doctoral-trained psychology providers.

Psychology Requires Novel Solutions to Increase Health Human Resource Supply: Section 2.1 of the Health Professions Procedural Code being Schedule 2 of the RHPA describes a College's duty to "work in consultation with the Minister to ensure, as a matter of public interest, that the people of Ontario have access to adequate numbers of qualified, skilled and competent regulated health professionals." The public's need for mental health services has increased exponentially during and since the COVID-19 pandemic. The data suggests that Master's registrants are most prevalent in the private sector, not public. This is most likely due to the lucrative nature of private practice.

As of 2021, there were approximately 19,485 professional psychologists across Canada.² Psychology is a "small batch" profession given the extensive knowledge and skill that must be acquired through formal coursework, clinical experience, and research/scholarship. Professional development during these formative years is also guided by extensive supervision across clinical practica and a pre-doctoral internship, in addition to the College's year of supervised practice. The resource-intensive nature of developing a psychologist creates limits to the numbers in the profession. A more efficient method to maximize the number of available psychologists to the Ontario public is to pool health human resources with another jurisdiction, such that potentially capacity in both provinces is increased. This approach is in alignment with the Ministry of Health's "[As of Right](#)" legislation that aims to expedite the onboarding of regulated health professionals from other Canadian jurisdictions in Ontario.

To ensure adequate numbers of practitioners, the College could create novel solutions to increasing health human resource supply, such as interjurisdictional agreements with other Canadian Psychology regulators to create a larger pool of psychological practitioners. There is interest in an "open corridor" with a form of shared registration between British Columbia (BC) and Ontario allowing for virtual and in-person services in both jurisdictions. Given BC's similar requirements to what is proposed in this report, this 'corridor' could serve as an initial pilot to then scale and spread across the country. Allowing for the flow of psychologists between these two provinces is in alignment with provincial and federal

² <https://www.statista.com/statistics/806108/psychologist-number-in-canada/>

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initiatives already in development for other health professions and would serve to demonstrate the College's openness to innovation to meet the public need. The provinces of Atlantic Canada have established a telepsychology MOU to increase the capacity of service provision in the region. A Multi-Jurisdictional Limited Telepsychology MOU between a number of Canadian jurisdictions (Ontario included) is launching to improve continuity of care. However, a fully open corridor between BC and Ontario allowing for in-person and virtual services provision would provide an innovative solution with even greater capacity to alleviate the mental health human resource crisis, particularly with respect to in-person, public sector settings where there is the greatest need.

Labour Mobility Provisions Will Continue to Allow Master's-Level Registration Across the Country:

Under Chapter 7, Labour Mobility provisions of the CFTA, the College must recognize practitioners, as qualified to practice, who are registered with a regulatory body in another province or territory. This is further supported by the requirements of the mobility provisions set out in the College's Registration Regulation (O. Reg. 74/15). Psychology professionals who practice in other provinces and who have been granted the title Psychologist based on Master's-level training, may register in Ontario and use the title Psychologist. The College of Alberta Psychologists, for example, registers Psychologists at the Master's-level. Those who register in Ontario under Labour Mobility provisions, who hold a Master's-level degree and who use the title Psychologist in their home province, must be granted registration with that title.

Psychological Associates registered with the College in Ontario are engaging in "registration tourism" becoming secondarily registered in another province where Master's-level registrants use the title Psychologist and then applying for a Certificate of Registration as a Psychologist in Ontario using Labour Mobility provisions. At this time, the number of Master's-level Psychologists have surpassed the number of Psychological Associates. This pattern is not in the best interest of the public, as it creates confusion and a lack of clarity.

The scope of practice and presence of restricted/controlled acts also differ across jurisdictions. For example, in [Saskatchewan](#), communication of a clinical diagnosis in writing is restricted to those with an Authorized Practice Endorsement over and above College registration which differs from Ontario.

- *In order to identify and communicate a clinical diagnosis in writing, a psychologist in Saskatchewan requires a special additional licence, called an Authorised Practice Endorsement, in addition to membership in the College of Psychologists.*

Regardless of the College's decision with respect to Ontario-trained Master's-level professionals, the College will continue to be required to register applicants from other provinces under Labour Mobility provisions. Should the College decide to close Master's-level registration, it will not fully address the reality of Master's-level Psychologists continuing to get registered from other jurisdictions and current Psychological Associates in Ontario engaging in "registration tourism." Hence, the title issue should also be addressed when the Council decides on the matter of Master's registration.

RECOMMENDATIONS

The College Council's decision to close Master's-level registration is substantiated by the lack of graduate programs in Ontario that are designed to produce autonomous psychological providers at the Master's-level. This issue is further exacerbated at the registration stage, as the College must determine if applicants with heterogeneous academic backgrounds and training experiences (including self-training of foundational concepts) with a Master's degree could qualify for registration. This process is resource-intensive, both from a financial and a human resource perspective. Further exacerbating the issue is that Master's-level applicants who have been rejected appeal their decisions disproportionately more often than Doctoral applicants. A number of Master's-level applicants are registered with the CRPO (or eligible to apply). Given the frequency of Master's-level registrants in

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Ontario becoming registered in another jurisdiction for the purpose of obtaining the title of *Psychologist* with no additional qualifications, there is a need for increased consumer protection. The negative optics of closing a route to registration must be anticipated in order to offset any negative repercussions. If the Ministry of Health approves the College's proposed closure of the Master's-level route to registration, a robust health human resource strategy (such as the open corridor pilot with BC) will be crucial to ensure that the public's access to psychological care is not unduly impacted. An option for the Council's consideration is as follows:

Close Master's-level Registration in Ontario

- a. Grant the title of Psychologist to all registrants with a clear specification of level of training (e.g., Psychologist (Master's-Level); Master's-Level Psychologist; Psychologist (Master's); Use of the title, "Dr" for Doctoral prepared psychologists; Psychologist (Doctoral-Level))
- b. Close new applicants in Ontario at the Master's-Level
- c. Ensure mechanisms and procedures are available to evaluate internationally trained applicants.
- d. Establish an MOU with BC to increase health human resource supply, particularly in much-needed publicly funded positions in Ontario that require on-site service delivery such as hospitals, schools, and correctional facilities. Resource pooling with BC would create an immediate increase of up to 1,400 additional psychology providers who could work in Ontario to fill the much-needed shortage of psychologists working in public settings. This increase in potential psychologists in Ontario would alleviate any human resource shortages that could result from eliminating new Master's-level registration in Ontario. Psychology is a small batch profession with only a few hundred new registrants each year, with Master's-level registrants accounting for a small percentage of overall membership. Larger scale initiatives such as pooling health human resource capacity across jurisdictions would not only address any potential decreases in registrants due to eliminating the Master's-level route to entry into the profession but would actually serve to increase the human resource pool considerably. When considering scale, it is important to note the benchmark comparators of other mental health professionals within the province. The CRPO and the College of Social Workers/Social Service Workers have significantly more members than the College of Psychologists (approximately 13,000 and 27,000, respectively), and there is no indication that the College of Psychologists will ever be able to reach parity due to differences in training, supervision, and registration.

An interjurisdictional solution between BC and Ontario would be in alignment with leaders in the regulatory space, such as the College of Physicians and Surgeons, and would provide consumers with increased choice. Pan-Canadian registration is the zeitgeist in healthcare regulation in Canada and would demonstrate to government that the College is forward-thinking and is attempting to align with "As of Right" legislation as much as possible. An agreement with BC could serve as an innovative pilot to create proof of concept that could eventually be scaled to the other Canadian psychology regulators, maximizing the pool of potential psychological providers across the country.

ATTACHMENTS

1. Appendix A: A Brief History
2. Appendix B: Director of Clinical Training – Masters-Level Training Interview

CONTACT FOR QUESTIONS

Tony DeBono, MBA, Ph.D., C.Psych.
Registrar & Executive Director

Appendix A: Brief History

Early History

Psychology in Ontario was initially regulated by the [Psychologists Registration Act, 1960](#). The academic requirement into the profession was established as the Doctoral degree. For the first six years post-proclamation, psychology professionals with a Master's degree were grandparented if they had four years of acceptable experience. This was repealed in June 1966, ending the six-year grandparenting period. When the [Psychology Act, 1991](#) was proclaimed into law the scope of practice authorized to members of the College did not differentiate between Psychologists (Doctoral-level trained) or Psychological Associates (Master's-level trained). No distinction is made in the Act between professionals holding these two titles with respect to scope of practice or authority to perform controlled acts authorized to the profession. The College made efforts during the early years of the RHPA to restrict those registered with Master's-level education from performing controlled acts unless they met additional registration requirements. In 1999 this requirement was appealed to HPARB which concluded that "the Psychology Act made no distinction between members with different academic credentials" and "the College purported to establish a new class of member that is not in accord with the existing statutes and regulations".

Task Force on Shaping the Future of Psychology Regulation in Ontario - March 2013

Following the proclamation of the Psychology Act, 1991 and the implementation of Labour Mobility provisions under the AIT, the College Council discussed the implications of these pieces of legislation. At its March 26, 2010, meeting, the College Council appointed a Task Force to propose a plan of action to the Council in June 2010. This group became known as the Task Force on Shaping the Future of Psychology Regulation in Ontario ("the Task Force") and in June 2010, Council approved the following mandate:

- To consider the implications of the amended AIT for regulation of the profession of psychology in Ontario.
- To consider current issues and trends in psychology regulation, training and employment/human resources needs in Ontario.
- To consider issues and trends for regulation of the profession outside of Ontario (for example, issues and trends in psychology regulation and training in other Canadian jurisdictions and possibly in the United States).
- To propose a plan of action that would assist Council in reaching a solution that is appropriate for regulation of the profession in Ontario while meeting its obligations to issue a certificate of registration to an applicant, from another Canadian AIT signatory jurisdiction, who holds a certificate of registration equivalent to a certificate of registration that the College is authorized to issue.

On March 22, 2013, the Task Force presented its report, suggesting two options for Council consideration, based on its research:

1. Change to limited Master's-level registration and grandparent Psychological Associates as Psychologists; or
2. Discontinue Master's-level registration, grandparent Psychological Associates as Psychologists and develop a mechanism for evaluating internationally trained applicants.

The Council voted in favour of adopting Option 2.

In 2015, the College consulted with members and stakeholders on a possible implementation plan to discontinue Master's-level registration, grandparent Psychological Associates as Psychologists and develop a mechanism for evaluating internationally trained applicants. The consultation found that there was concern regarding the Council's decision among some respondents.

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ACPRO-NATIONAL STANDARD POSITION STATEMENT

On November 16, 2014, ACPRO adopted a Position Statement - National Standard for Entry to Practice which states:

"Consistent with the public protection mandate of the Canadian Psychology Regulators the following is the position of ACPRO on a National Standard for entry to practice requirements for practice in Psychology. The National Standard for registration as a Psychologist is graduation from a doctoral program in Psychology accredited by the Canadian Psychological Association (CPA)."

The position statement provides details of required Foundational Knowledge, Training Program Elements, Assessment of Core Competencies and Licensure Examinations that form the basis of competent, safe, quality care of clients by Psychologists. These requirements are not detailed here as they are well documented by ACPRO. The statement is supported by a robust CPA-accreditation system for Doctoral-level programs. There is no doubt, that there is support for the training of Psychologists at the Doctoral-level as this provides the most comprehensive and focused clinical training program for psychology professionals.

ACPRO also recognized the variations in Master's-level training compared to training at the Doctoral-level and left it to the provinces to determine if they would accept Master's-level applicants for registration. The College of Psychologists of New Brunswick recently adopted the Doctoral standard for entry into the profession. British Columbia adheres to the Doctoral standard, and they have established a specific [certificate of registration for School Psychology based on Master's-level training which will be proclaimed on May 1, 2024](#).

In BC, the "Restricted Activities" differ between Psychologists and School Psychologists as the latter is specific to practice within a learning environment and diagnoses are made in relation to learning and intellectual functioning.

Restricted activities

- 6(1) *A registrant who is a psychologist may, in the course of practising psychology, make a diagnosis identifying a mental condition or disorder as the cause of the signs or symptoms of an individual.*
- (2) *A registrant who is a school psychologist may, in the course of practising school psychology within a learning environment, make a diagnosis identifying a mental condition or disorder as it relates to learning and intellectual functioning as the cause of the signs or symptoms of an individual within that environment.*
- (3) *Only a registrant may provide a service that includes the performance of an activity set out in subsection (1) or (2).*

LABOUR MOBILITY

Prior to 2010, the College relied on an MOU among the jurisdictions to register applicants who applied under the AIT. At that time, those registering in Ontario with a Doctoral degree, would have access to the title Psychologist, while those who registered with a Master's degree (regardless of the title used in their home province) would use the title Psychological Associate.

In 2010, changes were made to AIT, which continues today, under the CFTA. Psychology professionals who practise in other provinces and use the title Psychologist, regardless of the educational background accepted for registration in their home province, can register in Ontario and use the title Psychologist.

Closure Of Master's Level Registration Report

These registrants are not restricted to the use of the title Psychological Associate as is required of those registering directly in Ontario with Master's-level education.

As noted previously, Psychological Associates in Ontario, who wish to use the title Psychologist have learned that they can register in another jurisdiction where Master's-level psychology professionals use the title Psychologist (e.g. Alberta). They can then re-register in Ontario as Psychologists, under the Labour Mobility provisions, allowing them to use the title Psychologist. The College is required to register applicants under the Labour Mobility provisions making it impossible for the College to refuse registration to Master's-level applicants who are registered in another province.

Motions by Council re: Close Master's-Level Registration – March 22, 2013, September 21, 2018 and September 27, 2019

On March 22, 2013, following a discussion of the Task Force on Shaping the Future of Psychology Regulation in Ontario, the College Council passed a motion to "Discontinue master's level registration, grandparent Psychological Associates as Psychologists and develop a mechanism for evaluating internationally trained applicants." While this motion was discussed on numerous occasions at many subsequent Council meetings, it did not return to the Council Agenda for specific direction until September 2018.

On September 21, 2018, the Council passed a motion to "continue registration of individuals with a master's degree plus four years of supervised experience and grant them the title of Psychologists and investigate a mechanism to accomplish this". This motion, in effect, rescinded the 2013 decision to close Master's-level registration but supported the granting of the title Psychologist to all Ontario registrants. In the spring of 2019, the College embarked on an extensive consultation process seeking feedback from members and stakeholders on the proposal to grant the title Psychologist to all providers of psychological services in Ontario as suggested in the March 2013 and September 2018 motions.

Council considered the consultation feedback at the September 27, 2019 meeting and decided that since training at the Doctoral and Master's-levels were not equivalent, there should not be a single title, as previously decided. Based on this, the Council rescinded the motion made a year earlier, on September 21, 2018. The effect of rescinding the motion was to confirm the "status quo". That is, maintain Master's-level registration and the use of the title Psychological Associate for these registrants. The motion was carried by a majority vote, albeit with four Council members who did not support the motion.

Having rescinded the motion to maintain the "status quo", Council then revisited the issue of closure of Master's-level registration, which had been decided in March 2013 and was subsequently rescinded in September 2018. Following extensive discussion, minutes of the meeting of September 27, 2019 reflect the following:

It was MOVED DiZazzo

That the College pursue amendments to O. Reg. 74/15 - Registration under the Psychology Act, 1991 to discontinue Master's level registration. CARRIED

Staff was tasked with implementation of the action item associated with the motion; "To pursue amendments to O. Reg. 74/15 - Registration under the Psychology Act, 1991 to discontinue Master's level registration and at that time, grant the title Psychologist to all existing Psychological Associates."

Closure Of Master's Level Registration Report

Appendix B: Director of Clinical Training – Masters-Level Training Interview

Y/N: Does your program confer Masters degrees in Clinical Psychology (or other practice areas, such as school psychology, neuropsychology, etc.)?: _____

Y/N: If the answer is "yes", Does your program offer a terminal Masters degree in Clinical Psychology (or other practice areas, such as school psychology, neuropsychology, etc.)?: _____

Y/N: If yes, was the terminal Masters degree designed to prepare graduates as Psychological Associates?

Y/N: If yes, how do terminal Masters degree students obtain clinical training?: _____

Y/N: If yes, what percentage of your graduates go onto registration with the College as Psychological Associates and where do they work? _____ %

If your program does not offer a terminal Masters degree in Clinical Psychology (or other practice areas, such as school psychology, neuropsychology, etc.):

- Y/N: Does your program offer the required graduate courses for registration with the College at the Masters level?
- Y/N: Does your program offer clinical training at the Master's level intended to prepare graduates with the experience required for registration with the College?
- %: What percentage of your students do not proceed to the doctoral program and become registered with the College at the Masters level?
