

August 11, 2025

Dear CPBAO,

As the incoming and outgoing Chiefs of Psychology at the Centre for Addiction and Mental Health (CAMH) - Canada's largest mental health teaching hospital — and with the full support of our Chief Medical Officer, we are writing to express our strong opposition to the proposed changes to registration standards for Psychologists and Psychological Associates in Ontario.

The proposal to remove the doctoral-level requirement for Psychologists, shorten supervised practice for Psychological Associates, weaken accreditation standards, and eliminate defined scopes of practice risks lowering the quality, safety, and integrity of psychological care in Ontario. While we share the goals of improving access, equity, and interprovincial mobility, these aims must not come at the cost of public protection or clinical excellence. This omnibus lowering of standards, we argue, compromises the core mandate of the CPBAO to protect the public interest in relation to psychological services.

At CAMH, our strategic priorities include **driving innovation in care, improving access to integrated mental health services, and ensuring care is equitable, high-quality, and evidence-based**. Psychologists are essential to achieving these goals. Their advanced training enables them to conduct complex diagnostic assessments, lead interdisciplinary care for high-risk populations, and provide specialized interventions - functions that cannot be substituted by less-trained providers without compromising safety and care quality. Lowering entry standards would blur professional distinctions, risk misdiagnosis, undermine evidence-based treatment, and ultimately harm public trust.

Ontario is not experiencing a shortage of master's-level mental health providers; rather, we face a shortage of highly trained doctoral-level Psychologists. The solution lies in expanding accredited Ph.D. and Psy.D. training capacity, enhancing diversity in admissions, creating bridging pathways for internationally trained psychologists, and making better use of Psychologists' expertise in leadership, supervision, and consultation across the system.

Lowering standards would especially harm marginalized communities, who often require the highest levels of expertise due to complex and intersecting needs in the delivery of high-quality, equitable, and culturally-relevant care. Equity requires equal access to quality—not a two-tiered system with reduced expertise for some populations.

We urge the CPBAO to protect Ontario's longstanding high standards, consistent with other jurisdictions in Canada, the US, and the UK, where the title "Psychologist" requires doctoral-level training. Ontario should be a leader in mental health excellence, not an outlier in reduced standards.

Thank you for your attention to this matter and for your commitment to safeguarding the mental health of Ontarians.

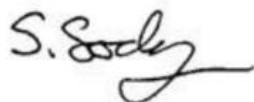
Sincerely,



Lena C. Quilty, PhD, CPsych
Incoming Chief of Psychology, CAMH



Sean Kidd, PhD, CPsych
Outgoing Chief of Psychology, CAMH



Sanjeev Sockalingam, MD, FRCPC, MHPE
Senior Vice President, Education and Chief Medical Officer, CAMH