



## Private Practice FAQ

### Contents

Contents .....	1
WHO CAN OPEN A PRIVATE PRACTICE.....	2
Considerations for opening a private practice.....	2
Can an RP (Qualifying) open a private practice? Is independent practice a requirement to open a private practice? .....	4
Can an RP (Qualifying) who is still a student open a private practice?.....	4
Can a student (non-registrant) open a private practice? .....	4
TYPES OF BUSINESSES.....	5
Do I have to incorporate? .....	5
How do I incorporate?.....	5
Do I need to register my business? .....	6
Can I operate a private practice from my home? .....	6
Can I open a private practice that focuses on one population?.....	7
I am registered with CRPO but my practice is registered in another province. Do I also need to register my business with CRPO? .....	7
What can I name my practice?.....	8
INTER-PROFESSIONAL RELATIONSHIPS.....	9
Can I hire other health professionals if I own a private practice? .....	9
Can a non-registrant have a psychotherapy business and hire CRPO registrants? .....	9
FEES.....	9
Can I offer a promotion to increase access to services? Can I offer a package deal?.....	9
Can I offer gift cards? .....	11
Can a student therapist charge fees? .....	12

## WHO CAN OPEN A PRIVATE PRACTICE

### Considerations for opening a private practice

RPs practice in a variety of environments and with different client populations. There are a lot of ways to set up your practice in a way that fits your context, provided that you are complying with CRPO [Professional Practice Standards](#). In addition to reviewing the available resources listed below, you are encouraged to discuss these matters with your legal, financial, and clinical advisors.

All registrants are required under CRPO's [By-laws](#) to carry professional liability insurance. CRPO requirements for liability insurance can be found on this page of our website: <https://www.crpo.ca/professional-liability-insurance/>. Registrants in private practice may want to consider additional, optional forms of insurance, including general commercial, cyber, business interruption, life, disability, and employment insurance (EI).

If you begin working in private practice, be sure to update your practice sites in the Public Register: <https://www.crpo.ca/updating-your-public-register-or-personal-contact-information/>

The following resources can help inform your decision-making as you set up your practice:

### CRPO resources

- Business Practice: <https://crpo.ca/registrant-information/professional-practice-information/naming-your-practice/>
- Professional Practice Standards Section 6: Business Practices: <https://www.crpo.ca/standards-section-6-business-practices/>
- Personal Health Information Protection Act (PHIPA): <https://crpo.ca/resource-articles/personal-health-information-protection-act-hipa/>

Practice Matters articles: <https://crpo.ca/registrant-information/professional-practice-information/practice-matters/>

- Fees: <https://crpo.ca/resource-articles/i-am-an-rp-and-i-am-opening-a-private-practice-im-confused-about-fees-and-billing/>
- HST: <https://crpo.ca/resource-articles/are-crpo-registrants-required-to-charge-hst/>
- Professionalism in business relationships: <https://crpo.ca/resource-articles/my-employers-policies-clash-with-crpos-practice-standards-which-one-should-i-follow-copy/> and

- Contingency planning: <https://crpo.ca/resource-articles/what-happens-to-my-clients-and-clinical-records-if-im-suddenly-no-longer-able-to-practise/>
- Health information custodian and health information custodian successor: <https://crpo.ca/resource-articles/health-information-custodian-and-health-information-custodian-successor/>
- Options for Clients When an RP Leaves a Group Practice <https://crpo.ca/resource-articles/options-for-clients-when-an-rp-leaves-a-group-practice/>

#### Electronic practice resources:

- Implementing Electronic Practice <https://crpo.ca/resource-articles/implementing-electronic-practice/>
- What Platform Should I Use? <https://crpo.ca/resource-articles/what-platform-should-i-use-if-i-decide-to-provide-services-over-videoconferencing/>
- Selecting a Communications Platform for Electronic Practice: <https://crpo.ca/resource-articles/practice-advisory-selecting-a-communications-platform-for-electronic-practice/>
- Standard 3.4 Electronic Practice <https://www.crpo.ca/standard-3-4-electronic-practice/>
- Electronic Practice Guideline: <https://crpo.ca/wp-content/uploads/2024/09/Electronic-Practice-Guideline-Mar19.pdf>
- Security Practices Checklist: <https://crpo.ca/wp-content/uploads/2024/09/Security-Practices-Checklist-for-Electronic-Practice-Oct824.pdf>
- Webinar [How to Expect the Unexpected in Online Practice – YouTube](#)
- Cross-border therapy tool <https://crpo.ca/registrant-information/professional-practice-information/cross-border-therapy-tool/>

#### Other resources

[Canadian Counselling and Psychotherapy Association \(ccpa-accp.ca\)](https://ccpa-accp.ca): there are several resources on this page on varying topics related to setting up a private practice.

## **Can an RP (Qualifying) open a private practice? Is independent practice a requirement to open a private practice?**

Registrants in the Qualifying category of registration can have their own private practice, as long as they have the competence to do so safely and effectively (see CRPO Professional Practice Standards Section 2: [Competence](#)). Similarly, independent practice is not a prerequisite for opening a private practice. Registrants need to make sure they continue to obtain appropriate supervision of their private practice until CRPO staff confirm they have met the independent practice requirement.

RP (Qualifying) registrants must practise with ongoing clinical supervision and each of their practice sites must be supervised. As well, RP (Qualifying) registrants must be actively pursuing the completion of any of the requirements to achieve full status as a Registered Psychotherapist (in other words, it is not okay to stay at Qualifying status indefinitely). This includes successfully completing the Registration Examination and gaining the required clinical experience of at least 450 hours of direct client contact and at least 100 hours of clinical supervision where that clinical supervision relates to those hours of direct client contact.

## **Can an RP (Qualifying) who is still a student open a private practice?**

We have a helpful Practice Matters article that answers this question. Please see: Can a student work in an employment or private practice setting, if they are a CRPO registrant, i.e., in the Registered Psychotherapist (Qualifying) registration category?

<https://crpo.ca/resource-articles/can-a-student-work-in-an-employment-or-private-practice-setting-if-they-are-a-crpo-registrant/>

## **Can a student (non-registrant) open a private practice?**

CRPO does not have direct jurisdiction to govern the practices of students and those awaiting approval of their application, though their conduct may be reviewed as part of their application for registration with CRPO.

Until a student becomes registered with CRPO, they may not:

- Use the title “psychotherapist”, “Registered Psychotherapist” or any abbreviation or variation thereof in any language.
- Hold themselves out as qualified to practise as a psychotherapist in Ontario (no matter what title they use).
- Perform the controlled act of psychotherapy (unless they are supervised by an RP during a practicum).

Someone can work in the broader scope of practice of psychotherapy if they adhere to the above restrictions.

## Scope of Practice of Psychotherapy

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.

## Controlled Act of Psychotherapy

In the course of engaging in the practice of psychotherapy, a member is authorized, subject to the terms, conditions and limitations imposed on their 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.

You can use the Self-Assessment Tool to determine whether you are performing the controlled act (Questions 4-6): <https://crpo.ca/apply-to-crpo/how-to-apply/do-i-need-to-apply/>

## TYPES OF BUSINESSES

### Do I have to incorporate?

CRPO registrants can choose to practise

- personally (i.e., in their own name/sole proprietor/employment setting);
- through a partnership; or
- through a professional corporation.

Registrants are not required to practise through a professional corporation.

### How do I incorporate?

If a person wishes to practise psychotherapy through a corporation, it needs to be through a **psychotherapy professional corporation** that meets all the requirements to hold a certificate of authorization issued by CRPO.

To obtain a Certificate of Authorization, the registrant must complete the [Professional Corporation Certificate Application form](#), pay the fee and submit detailed substantiating information. The Certificate must be renewed annually.

It is important to note the following points about professional psychotherapy corporations:

- only CRPO registrants can hold shares in the professional corporation;
- the officers and directors of the professional corporation must be shareholders; and
- the professional corporation can only offer psychotherapy services, or provide related or ancillary services.

Other considerations are outlined on this page of our website: <https://crpo.ca/registrant-information/professional-practice-information/naming-your-practice/>

As highlighted above, psychotherapy professional corporations are the only kind of corporation that can itself practise psychotherapy. At the same time, the only business a psychotherapy professional corporation can engage in is the practise of psychotherapy, along with related and ancillary activities.

This does not prevent RPs from being involved with other kinds of corporations or arrangements. For example, other kinds of corporations can offer different services, like renting space to psychotherapists, providing support/marketing, etc., but the RP would need to seek independent business or legal advice on how to set up such business arrangements.

Setting up and administering a psychotherapy professional corporation has various added costs, including government, legal, accounting and CRPO fees. It is mainly intended for RPs with sufficient income such that the tax and liability advantages offset associated costs.

We encourage registrants to seek business and legal advice from appropriately trained professionals. Because of the many possible corporate, legal, and business arrangements, it is not possible for CRPO to give an opinion on someone's situation.

### **Do I need to register my business?**

If you begin working in private practice, please be sure to update your practice sites in the Public Register: <https://www.crpo.ca/updating-your-public-register-or-personal-contact-information/>

Beyond this, you may need to register information about your business elsewhere (e.g., with Service Ontario). We would advise you to contact your financial and legal advisors for guidance about this. In general, business name registration is required when practising under anything other than one's own personal name e.g., registration is required if using a clinic or brand name.

### **Can I operate a private practice from my home?**

There is no College Standard or policy that prevents you from providing therapy from an office that is also located in your place of residence. However, your municipality may have relevant by-laws or regulations in place related to the operation of a business (especially if clients are physically attending the place of business), and it would be prudent to look into this prior to establishing a residential office.

Registrants are expected to practice in accordance with CRPO's [Professional Practice Standards](#) in any practice environment. For example, Standard 6, [Business Practices](#), states: "Clients expect their therapists to provide a suitable practice environment..."

Key considerations when operating a psychotherapy practice from a residential office include taking measures to protect the client's privacy and your own safety. With respect to privacy, you may need to consider the physical space and how it can be set up and maintained to protect privacy and confidentiality (See Standard 3.1, [Confidentiality](#)). With respect to your safety, you may wish to think through the risks of providing therapy to clients in your place of residence and plan accordingly.

You may find it helpful to connect with a colleague who has an established residential office to discuss their experience. It may also be helpful to connect with a lawyer and (as noted above) your municipality to inquire about the operation of a business in a residence.

### **Can I open a private practice that focuses on one population?**

Many therapists have expertise in specific areas that would not be a fit for every client. The important issue would be that you are working within your area of competence (see Professional Practice Standard 2.1: Competence). A registrant must not refuse to provide services to a potential client in bad faith, i.e., for discriminatory reasons (see Standard 6.3).

Consultation with a trusted supervisor may be also useful as you navigate your new practice.

### **I am registered with CRPO but my practice is registered in another province. Do I also need to register my business with CRPO?**

If you are establishing a new practice site, be sure to update your practice sites in the Public Register: <https://www.crpo.ca/updating-your-public-register-or-personal-contact-information/>

CRPO registrants who practise from another jurisdiction must be able to comply with the laws where they are located, in addition to the requirements that apply as a registrant of CRPO. You are encouraged to inquire into which laws impact your practice while you are physically located in another province or territory. For information, please see this page of our website: <https://crpo.ca/registrator-information/registrator-requirements/requirements-overview/#out-of-province-registrants>

CRPO cannot provide advice or direction regarding where your business needs to be registered. You should consult with your lawyer and/or accountant for guidance on your specific situation.

### **What can I name my practice?**

CRPO registrants are permitted to choose a name for their practice, whether they operate as a partnership or a professional corporation, or they are self-employed. In all cases, the name will need to comply with CRPO's [Standard 6.2: Advertising](#), as well as general Ontario law regarding business names.

The [Professional Misconduct Regulation](#) states that it is professional misconduct to permit the advertising of a registrant's practice in a manner that is false or misleading or that includes statements that are not factual and verifiable. Therefore, the name registrants choose for their practice must not make claims that are false or misleading. Also, any specific information contained in the name (e.g. location, name of practitioner), must be factual and verifiable.

On official documents, e.g. invoices, and when identifying themselves to a client, a registrant must use their name as set out in the College's [Public Register](#), in addition to any business name. The practice name may appear alone in other settings such as on signage and various marketing materials. Please see below for more information about naming a professional corporation.

Examples of appropriate practice names could include:

- Harmony Family Counselling Centre
- Deerhurst Psychotherapy Services (if the practice is located there)

Examples of inappropriate practice names include:

- Best Therapy Services (claim is not verifiable and potentially misleading)
- Guaranteed Results Psychotherapy Clinic (claim is not verifiable and potentially misleading)
- M. Jones and Associates Psychotherapists (if there are no associates, the name would not be factual)
- Brockville Municipal Care Centre (if it is not a municipally run practice, the name would be misleading)

College staff cannot provide advice or direction regarding business names. You should consult with your legal or business advisor for further information. [Please see Business Practice <https://crpo.ca/registrator-information/professional-practice-information/naming-your-practice/>]



## INTER-PROFESSIONAL RELATIONSHIPS

### **Can I hire other health professionals if I own a private practice?**

A Registered Psychotherapist (RP) can hire or work with different health professionals. In fact, it is encouraged by Standard 3.3 – [Communicating Client Care](#). The other regulated health professional would follow the rules from their own college. Clients should be made aware of what services they are receiving, from whom, how information is shared, and any limits on treatment that can be provided.

CRPO also has a Practice Matters article on professionalism in business relationships that provides important considerations when working with others: [Professionalism in Business Relationships](#). In general, when working with others, RPs should vet the credentials of associates, have contracts in place, act as the point of escalation, and maintain broad oversight.

Because this can be a technical, specialized process, legal advice is recommended.

### **Can a non-registrant have a psychotherapy business and hire CRPO registrants?**

A non-registrant, especially one who is not part of any health profession, is not accountable for meeting professional standards. There is a risk that if an RP agrees to work for an unregulated individual, the RP may feel pressured to act against CRPO Standards in order to promote the business.

To mitigate these risks, RPs must be cautious and carefully review written contracts. The RP must be satisfied that they will be able to uphold CRPO Standards while working for the business. If sharing business revenues with unregulated individuals, RPs are required to have a contract clause stating that the registrant will have control over, and be responsible for, their own professional decisions, and for maintaining professional standards (see Standard 1.6).

## FEES

### **Can I offer a promotion to increase access to services? Can I offer a package deal?**

RPs are expected to be transparent and reasonable in their billing practices and avoid conflicts of interest. This includes ensuring that clients understand what is included in the fees they are paying, documenting any discussions about fees, and indicating the reasons why a fee may have been reduced or waived. (See Standard 6.1: Fees and Standard 5.5: Financial Records, linked below.)

### **Promotional rates**

RPs are permitted to offer a promotional rate to clients; however, it is important to avoid potential risks. These risks may include an offer that promotes unnecessary treatment, unduly influences a client's decision to receive treatment, or acts as a barrier once the promotional rate ends. It is not permitted to offer a discount for prompt payment, e.g., an 'early bird' rate. Offering gifts (other than of nominal value) or partnered promotions to begin therapy could create the perception of a conflict of interest and should be avoided.

While different from promotional rates, it is worth noting that registrants may accept payment on a sliding scale, i.e., a variable fee depending on ability to pay. Such an arrangement must be considered on a case-by-case basis and documented in the record.

### **Block fees and package deals**

Offering a set number of sessions for an agreed upon fee is a block fee arrangement. Standard 6.1.7 allows block fees for psychotherapy services as long as there is a written agreement in place detailing the following:

- services covered by the fee;
- the total fee;
- arrangements for paying the fee; and
- refund requests and procedures.

The last point is a safeguard that protects clients from receiving unnecessary treatment because they have already paid or paying for services when they are no longer attending treatment. To accomplish this, the agreement may hold that a portion of the block fee is refunded to the client if the relationship ends before all the services are provided. Clear policies on these matters will help a registrant avoid complaints.

You can access all CRPO Professional Practice Standards at the following links:

- Website: <https://crpo.ca/practice-standards/>
- PDF: <https://crpo.ca/wp-content/uploads/2024/09/Professional-Practice-Standards-Jan124.pdf>

## Can I offer gift cards?

The [Professional Practice Standards](#) do not provide specific reference and guidance on the matter of gift cards. For this reason, you must make your decision based on general principles.

Standard 1.6, [Conflict of Interest](#), defines a conflict of interest as “A situation that could interfere with a registrant’s ability to exercise appropriate professional judgment. A conflict of interest may be actual, potential, or perceived. The standard for judging a conflict of interest is to ask what a reasonable person, aware of the situation, would conclude. It is unnecessary to prove that the registrant’s judgment is actually compromised.”

Standard 6.1, [Fees](#), states the following:

*6.1.1 Registrants establish a standardized fee schedule and make it available to current and prospective clients. Registrants inform clients of their fee schedule prior to providing services.*

*6.1.2 Registrants charge fees that are reasonable in relation to services provided; fulfill the terms of agreements established with clients; and provide itemized accounts upon request.*

*6.1.3 Registrants do not offer discounts or incentives for pre-payment or prompt payment of services.*

*6.1.4 Registrants do not charge for services that are not provided, with the exception of late cancellations, missed appointments, or deposits.*

*6.1.5 Registrants do not unduly restrict methods of payment and do not provide discounts for preferred methods of payment.*

*6.1.6 Registrants should not barter their services with clients due to the risks of dual relationships and conflicts of interest.*

*6.1.7 Registrants offering block fees to clients ensure there is a written agreement in place detailing the services covered by the fee, the total fee, arrangements for paying the fee, and refund requests and procedures.*

When considering offering a gift card or other type of promotion to clients, there are several risks to be aware of. These risks may include: an offer that promotes unnecessary treatment, unduly influences a client’s decision to receive treatment, or acts as a barrier once the promotional rate ends. It is not permitted to offer a discount for prompt payment, i.e., an ‘early bird’ rate.

In the situation of a gift card, we would encourage you to anticipate how you might handle possible situations that might come up.

Here are a few examples:

1. Unbeknownst to you, a client of yours that you are seeing individually purchases a gift card for a member of their family. The family member contacts you wanting to book an appointment with you and use the gift card. How would you handle this conflict-of-interest situation?
2. A client wants a refund for a gift card previously bought. How do you handle this?
3. Years later, you are working in a different capacity, a former client wants to use the gift card. How do you handle this situation?
4. The recipient of a donated gift card wants to use it to book services, but their needs don't match what the clinic can provide. How do you handle this situation?

While selling gift cards is not prohibited, there are risks and you must be clear on how you will handle possible situations that may arise and ensure continued alignment with best clinical practices and the Professional Practice Standards.

### **Can a student therapist charge fees?**

Billing for services provided by a student or supervisee often reflects the supervisory arrangement. Dependent on this arrangement, billing can be generated from the practice itself (e.g., generated by an office manager), it can come directly from supervisor, or it can be generated by the student themselves.

Fees are generally paid to the entity issuing the invoice; however, it depends on the circumstances.

As a health profession regulator, the College is responsible for setting and enforcing practice standards on fees, however, we do not set the fees themselves. Information regarding this topic for CRPO registrants is covered in Professional Practice Standards 5.5 [Financial Records](#) and 6.1: [Fees](#).

As long as registrants and students comply with Standards 5.5 and 6.1, students could charge a fee for services, i.e., registrants and students must ensure that the client understands what is included in the fees they are paying, document client consent in the client record, and indicate the reason or reasons why a fee may have been reduced or waived.

It may be helpful for you to review these public web pages of recognized education programs for examples, and you could also consider reaching out to other RPs to learn more about how things are structured. Each situation is different though, and you would need to get your own advice, and consider the policies from the student's school if any: <https://tirp-lowcost-therapy.ca/>; <https://gestalt.on.ca/low-cost-therapy-clinic/>; <https://www.oaja.ca/analyst-training/training-candidates/>; <https://ticp.on.ca/finding-therapy/>

We would also note that the billing record must clearly state who provided the service. If a student sees clients for which fees are charged, the billing record must indicate that the student provided the service.

Standard 5.5 [Financial Records](#) indicates the following information should be included in financial records:

- clear identification of the person(s) providing the service and their title, and a clear identification of the client to whom the service was provided – client’s full name and address, and unique identifier (if applicable);
  - identification or description of the service provided, the cost of the service and the date and method of payment received; and
  - fees charged for services provided by supervised personnel.

For more information about billing and receipts, please see this Practice Matters article on [billing](#).

Finally, the College does not regulate students; however, students who provide psychotherapy services should have their name and title/student status on any invoice that is being issued to a client or to an insurance company. Please note, students, individuals fulfilling the requirements to apply to CRPO, and people awaiting approval of their submitted application, are not yet CRPO registrants. They may use the titles “student therapist” or “therapist in training.” Please see this Practice Matters article on considerations for practising before registration: [What can I call myself?](#)