College of Registered Psychotherapists of Ontario

Consultation

Registration Regulation Amendments

Introduction

This consultation document is released on behalf of the College of Registered Psychotherapists of Ontario (CRPO) to seek feedback from applicants, registrants, system partners, and stakeholders about the following five proposed amendments to the Registration Regulation (https://www.ontario.ca/laws/regulation/150067) under the *Psychotherapy Act, 2007*:

- Adding Independent Practice Requirement for RP (Temporary) Registrants
- Removing RP (Qualifying) Upgrading After Two Exam Failures
- Removing Substantial Completion of Education Option for Initial Registration for RP (Qualifying)
- Adding Minimum Clinical Experience Hours (125 direct client contact hours and 30 clinical supervision hours) for Recognized Education Programs
- Removing Currency Option of Completing Clinical Experience Requirement (450 direct client contact hours and 100 clinical supervision hours)

The proposed draft amendments to the Registration Regulation are attached as Appendix A.

Adding Independent Practice Requirement for RP (Temporary) Registrants

Current Requirement

- RP (Temporary) registrants are not required to practise with clinical supervision.
- See this link for more information: https://crpo.ca/apply-to-crpo/how-to-apply/temporary-category/

Proposed Change

- Add requirement that RP (Temporary) registrants must receive regular clinical supervision if they have not met the independent practice requirement of 1000 direct client contact hours and 150 clinical supervision hours.

Key Considerations

- Requiring clinical supervision if an RP (Temporary) registrant has not met the independent practice requirement ensures there is oversight of client work and support to the registrant while they work in Ontario for up to nine months.
- Applicants that register through other application types, including labour mobility, are required to meet the independent practice requirement. This change ensures consistency in supervision requirements across registration categories.

Removing RP (Qualifying) Upgrading After Two Exam Failures

Current Requirement

- CRPO's Examination Committee may require an RP (Qualifying) registrant to complete upgrading after two exam failures and before they may make their third attempt at the exam.
- See this link for more information: https://crpo.ca/wp-content/uploads/2024/09/Third-Exam-Attempt-Policy-Jun2124.pdf

Proposed Change

- Remove the requirement to complete upgrading after two exam failures.

Key Considerations

- The upgrading process has evolved over the years into the development of the Supervision Tool (https://crpo.ca/wp-content/uploads/2026/02/Supervision-Tool-June1424.pdf) intended to be used by an RP (Qualifying) registrant and their clinical supervisor who is best positioned to support their supervisee in identifying gaps in competence or experience and creating a plan with activities to address those gaps.
- There is currently a significant administrative burden for CRPO staff and the Examination Committee to approve learning plans for upgrading and monitor completion of activities.
- The Examination Committee has observed an increased prevalence of AI-generated learning plans by RP (Qualifying) registrants, reducing the impact and value of upgrading activities.

- Other safeguards remain in place for public protection including the requirement for all RP (Qualifying) registrants to practise with clinical supervision, actively pursue the requirements to transfer to RP, and make a third exam attempt within five years of the date of registration.

Removing Substantial Completion of Education Option for Initial Registration for RP (Qualifying)

Current Requirement

- Applicants can apply and register in the RP (Qualifying) category once they have substantially completed their education and training program and before they have graduated.
- See this link for more information: https://crpo.ca/apply-to-crpo/how-to-apply/application-overview/#substantial-completionof-education

Proposed Change

- Remove the option to apply and register in the RP (Qualifying) category prior to graduating.

Key Considerations

- Most other regulatory bodies, including other provinces that regulate psychotherapy in Canada, require graduation to apply for registration.
- Applicants often apply to CRPO too early and find the substantial completion of education definition confusing. Making this change improves clarity and ensures consistency across education programs regarding eligibility to apply to CRPO.
- Removing the option to apply prior to graduation eliminates the risk of a student registering with CRPO and then not completing their education program.
- There is a significant administrative burden with maintaining a substantial completion of education option for initial registration. Two program letters/transcripts must be sent from the educational institution and reviewed by CRPO staff. Removing the substantial completion option also eliminates the need for CRPO to track whether a registrant has graduated and has become eligible to write the exam. CRPO would no longer need to send tailored communication based on whether a final transcript has been received. This change would also eliminate registration expiries where the registrant fails to submit a final transcript by a deadline, resulting in interruption to client care while they re-apply to CRPO.

Adding Minimum Clinical Experience Hours (125 direct client contact hours and 30 clinical supervision hours) for Recognized Education Programs

Current Requirement

- It has been set out in policy that recognized programs must include a clinical placement with direct client contact and clinical supervision hours. Recently, the policy has been updated to specify that recognized programs have a minimum of 125 direct client contact hours and 30 clinical supervision hours.
- See this link for more information: https://crpo.ca/wp-content/uploads/2026/09/Program-Recognition-Policy-1.pdf

Proposed Change

- Add a requirement to the Registration Regulation that recognized programs must provide students with a minimum of 125 direct client contact hours and 30 clinical supervision hours.

Key Considerations

- Adding minimum clinical experience hours for recognized programs to the Registration Regulation promotes public confidence in the profession.
- The minimum hours work out roughly to four direct client contact hours and one clinical supervision hour per week for an eight-month practicum. The minimum hours balance developing competence and experience at a rate that allows for sufficient oversight and support from a clinical supervisor.
- The requirement for non-recognized program applications remains that the education and training must be substantially equivalent to a recognized program. CRPO is receiving a high number of applications where the applicant completed a program that did not include a clinical placement in psychotherapy. Adding minimum clinical experience hours for recognized programs to the Registration Regulation helps to ensure that decisions made by panels of the Registration Committee to refuse applications with no clinical placement are defensible on appeal to the Health Professions Appeal and Review Board.

Removing Currency Option of Completing Clinical Experience Requirement (450 direct client contact hours and 100 clinical supervision hours)

Current Requirement

- Applicants are required to demonstrate currency in one of the following ways:

    - Education and training program completed within the past 12 months from the date of application.
    - Currently completing education and training program.
    - Completed 450 direct client contact and 100 clinical supervision hours within the past 12 months from the date of application.
    - Completed 750 currency hours within the three years immediately prior to the date of application. Currency hours includes any activity related to psychotherapy.
- See this link for more information: https://crpo.ca/apply-to-crpo/how-to-apply/application-overview/#registration-requirements

Proposed Change

- Remove the currency option: Completed 450 direct client contact and 100 clinical supervision hours within the past 12 months from the date of application.

Key Considerations

- This currency option is not necessary and historically has not been used by applicants. Applicants that have graduated from their education and training program more than 12 months from the date of their application rely on the 750 currency hours within the three years immediately prior to the date of application because it is a more flexible option that can include any activity related to psychotherapy (e.g., direct client contact, record-keeping and preparation, providing clinical supervision, receiving clinical supervision, professional development, managing, teaching, other professional activities).
- Removing this option improves clarity for applicants.

Appendix A

Amendments to Ontario Regulation 67/15: Registration DRAFT 0.1

Section 16

16. ~~It is an additional term, condition and limitation on e~~Every Temporary certificate of registration is subject to the following terms, conditions and limitations~~that~~:

(a) the member's certificate of registration expires on the earlier of the expiry date noted on their certificate of registration and the day that is nine months after the date on which the certificate was issued, and

(b) The member must practise psychotherapy with clinical supervision until such time that they,

i. have completed at least 1000 hours of direct patient contact; and

ii. have completed at least 150 hours of clinical supervision related to the 1000 hours of direct patient contact referred to in subparagraph i.

Section 6, paragraph 4

(4) Subject to subsections (5) and (6), the requirement in paragraph 2 of subsection (1) is not considered to have been met unless the applicant,

(c) successfully completes the examinations~~,~~

~~(i)~~ within ~~two~~ three attempts~~, or~~

~~(ii) on a third attempt after having first successfully completed such further upgrading, if any, required by a panel of the Examination Committee~~.

Section 10

10. It is a non-exemptible registration requirement for a Qualifying certificate of registration that the applicant must have met all the requirements for the issuance of a Registered Psychotherapist certificate of registration except for,

(a) paragraph 2 of subsection 6 (1); or

(b) paragraphs 2 and 3 of subsection 6 (1)~~; or~~

~~(c) paragraphs 1, 2 and 3 of subsection 6 (1), where the applicant is actively engaged in satisfying the requirement in paragraph 1 of subsection 6 (1) after having already substantially completed the requirements of that paragraph~~.

Section 6, paragraph 3

(3) No program may be approved under paragraph 1 of subsection (1) unless:

(a) one of the core components of the program is designed to develop competency in the safe and effective use of self in a psychotherapeutic relationship, and

(b) the program provides students with at least 125 hours of direct patient contact and at least 30 hours of clinical supervision.

Section 6, paragraph 2

(2) Except in the case of an applicant to whom subsection 9 (1) applies, if the applicant has not completed ~~all~~ the ~~applicable~~ requirement~~s~~ set out in paragraph 1 ~~or 3~~ of subsection (1) within the one-year period immediately before the date that the applicant submitted their application, the applicant must,

(a) have completed at least 750 currency hours during the three-year period that immediately preceded the date that the applicant submitted their application; or

(b) have successfully completed such upgrading activities as approved by a panel of the Registration Committee.