College of Registered Psychotherapists of Ontario

# Substantial Completion FAQ for Applicants

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## APPLYING IN 2026

### What is the current substantial completion definition?

Under the current definition in effect through December 31, 2026, substantial completion means that you:

- are in your final semester before graduation;
- have completed 90% of your program*; or
- have completed your program with the exception of a thesis.

CRPO will accept applications from students who have substantially completed their coursework (i.e. 90% done classroom courses) even if they have not started or substantially completed clinical placements.

CRPO requires a transcript or confirmation letter from your program showing that you have completed 90% of your program.

### What will change on January 1, 2027?

At its December 11, 2025 meeting, CRPO's Council approved changes to the substantial completion definition.

Effective January 1, 2027, the minimum requirements for substantial completion of education and training for applying for registration with CRPO are all of the following:

- 100% of coursework completed
- Graduation is within three months of applying to CRPO
- Minimum 125 direct client contact hours and 30 clinical supervision hours successfully completed

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You must meet all of these requirements at the time you submit your application to CRPO. Your program must send confirmation to CRPO that you are expected to graduate within three months.

### I already graduated. Do I need to have completed 125 direct client contact hours and 30 clinical supervision hours in my program to apply?

Yes. All applicants must complete a clinical placement as part of their psychotherapy education program.

If you completed a CRPO recognized/accepted program, it must include a clinical placement with a minimum of 125 direct client contact hours and 30 clinical supervision hours. These hours must meet CRPO's definitions.

If you completed a non-recognized program, your program must be substantially equivalent to a recognized program. This includes requiring a clinical placement with direct client contact and clinical supervision hours that meet CRPO's definitions.

For more information, see the Recognized and Non-Recognized Programs page.

### I want to apply under the current definition by submitting an application on or before December 31, 2026. What dates do I need to know?

- Before December 11, 2026: Ask your program to send CRPO a transcript or substantial completion letter.
- December 11, 2026: Deadline for programs to send documentation to CRPO.
- December 11-23, 2026: CRPO staff will process documentation received by December 11.
- December 11-31, 2026: After CRPO processes your documentation, you will be able to complete the rest of the application form and pay the fee to submit your application under the current substantial completion definition
- January 1, 2027: The new substantial completion definition comes into effect. The new definition applies to applications submitted on or after this date.

CRPO's office will be closed from December 24, 2026 through January 1, 2027. CRPO will not process documentation or respond to questions during this time. Please plan accordingly.

### Is there a deadline for programs to submit documentation before the December 31 deadline?

Yes. CRPO has notified programs that they need to submit transcripts/letters by **December 11, 2026**. It is your responsibility to ask the program to submit the documentation by this date. You must monitor your account so that you can submit

your application by December 31, 2026 once we have processed the documentation.

### What if my program cannot send documentation by December 11?

Contact your program directly. Programs set their own timelines for final grades and documentation. CRPO is not involved in this. If your program does not issue documentation by December 11, you can apply under the new substantial completion definition in 2027.

### If my program submits documentation by December 11, is there anything else I need to do?

Yes. You still need to log into your CRPO account, finish filling out the application form, and pay the fee to submit your application. To apply under the current definition, you must do this by December 31, 2026. You will receive an email confirming that you have submitted your application.

### I will finish 90% of my coursework by December 31, 2026, but my grades will come out in January 2027. Which substantial completion definition applies to me?

The definition depends on when you submit your application, not when you finish your coursework. You cannot submit your application until CRPO has received and processed documentation from your school. If you submit your application before January 1, 2027, the current definition of substantial completion applies. If you submit your application on or after January 1, 2027, the new definition applies. In that case, you will need to wait to apply until you have completed 100% of your coursework, 125 direct client contact (DCC) hours, and 30 clinical supervision hours, and are within three months of graduation.

### I will complete 85% of coursework by December 31, 2026. Can I still apply under the current substantial completion definition?

No. The current substantial completion definition requires you to complete at least 90% of your coursework, so you would not be eligible to apply if you have completed under 90% of your coursework.

### I'm not sure when I will complete 90% of my coursework, how can I get more information?

Please contact your school directly to confirm how they calculate substantial completion.

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### Which definition applies if I submit in 2026 but my application is approved in 2027?

The definition depends on when you submit your application, not when it is approved. If you submit by December 31, 2026, the current definition applies, even if CRPO approves your application in 2027.

## APPLYING IN 2027

### What is the substantial completion definition in effect as of January 1, 2027?

Effective January 1, 2027, the minimum requirements for substantial completion of education and training for applying for registration with CRPO are all of the following:

- 100% of coursework completed
- Graduation is within three months of applying to CRPO
- Minimum 125 direct client contact hours and 30 clinical supervision hours successfully completed

You will have to meet all of these requirements at the time you submit your application to CRPO. A letter from your education program confirming you are expected to graduate within three months will be required.

## DEFINITION OF COURSEWORK

### What does it mean to complete 100% of my coursework?

You must have final grades for all coursework in your program. If you have completed all instructional hours and assignments but don't have your final grades, you are not yet considered to have completed your coursework.

### While I complete my practicum placement, I am enrolled in a seminar to help me integrate my practicum experiences and further develop entry-to-practice competencies. Is this seminar considered part of my coursework?

Yes. CRPO is aware that capstone learning components such as integration seminars are critical for entry-to-practice practitioners. The College sees this as the gold standard for psychotherapy training. You must finish all coursework, including integration seminars, before you apply.

### My practicum placement includes skills training. Is this considered part of my coursework?

If the training is separate from your practicum placement (for example, it has a separate syllabus and/or grade), it counts as coursework and you need to have

completed 100% of the training to be eligible to apply. If the training is part of your practicum course, you must be within three months of graduating to be eligible to apply.

### Do research papers or projects count as coursework?

If the research paper or project is required for a class, it counts as coursework. You need to have completed 100% of the paper or project to apply. If it is separate from a course (for example, a thesis or dissertation requirement), you need to be within three months of graduating to be eligible to apply.

### I haven't completed 100% of my coursework yet, but I have more than enough direct client contact and clinical supervision hours. Can I apply before I've completed 100% of my coursework given my high number of clinical experience hours?

No. You must meet each of the requirements to meet the substantial completion definition. Even if you have more than the required DCC and clinical supervision hours, you cannot apply until you have completed 100% of your coursework.

## GRADUATION TIMING

### Does graduation refer to finishing my program or attending convocation?

It refers to the date you finish all program requirements, not the date of your convocation ceremony. CRPO will accept your application three months before you finish all program requirements, even if the convocation ceremony is more than three months away.

### I met the substantial completion definition when I applied, but I am no longer on track to graduate within three months of my application. What should I do?

Email registration@crpo.ca as soon as possible. Explain what happened and your new timeline for graduation. As a Qualifying registrant, you are required to actively pursue the completion of all requirements, including graduating you're your psychotherapy training program. If you are not actively pursuing the requirements, your certificate of registration may expire. You would need to re-apply for registration to continue practising.

### I graduated more than three months ago. Can I still apply?

Yes. The substantial completion definition is only relevant to applicants who have not yet graduated. If you have already graduated, you can apply at any time, as long as you meet the registration requirements.

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## CLINICAL EXPERIENCE REQUIREMENT

### I already graduated. Do I need to have completed 125 DCC hours and 30 clinical supervision hours in my program to apply?

Yes. All applicants must complete a clinical placement as part of their psychotherapy education program.

If you completed a CRPO recognized/accepted program, it must include a clinical placement with a minimum of 125 direct client contact hours and 30 clinical supervision hours. These hours must meet CRPO's definitions.

If you completed a non-recognized program, your program must be substantially equivalent to a recognized program. This includes requiring a clinical placement with direct client contact and clinical supervision hours that meet CRPO's definitions.

For more information, see the Recognized and Non-Recognized Programs page.

### Am I required to register with CRPO before seeing clients in my practicum placement?

No. CRPO does not require you to register before your practicum placement. As clinical experience is required for registration, CRPO expects you to start seeing clients before registration.

All non-registrants can work in the broader scope of practice of psychotherapy. Additionally, because you are working towards registration, you fall under one of the exemptions in the *Regulated Health Professions Act, 1991* to perform the controlled act of psychotherapy if you are supervised by a Registered Psychotherapist. CRPO has FAQs specific to practicum placements and supervision of the controlled act before registration. You are expected to have professional liability insurance when you see clients. This may be through your education program, your clinical placement, or your own student insurance policy.

**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.

CRPO's article on practising before registration explains what you can call yourself and other points to consider.

### Do I need supervision by a Registered Psychotherapist (RP) before registration?

Yes, if you are in Ontario and performing the controlled act of psychotherapy.

The *Regulated Health Professions Act, 1991* (RHPA) sets out 14 controlled acts that are inherently risky and should only be performed by a properly qualified professional to ensure client/patient safety. It is illegal for someone to perform the controlled act if they are not authorized.

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The RHPA includes the following exemption for non-regulated individuals to perform the controlled act of psychotherapy:

> 29 (1) An act by a person is not a contravention of subsection 27 (1) if it is done in the course of,
>
> > (b) fulfilling the requirements to become a member of a health profession and the act is within the scope of practice of the profession and is done under the supervision or direction of a member of the profession;

A key part of the exemption is where it says, "the profession". This means that if you are not yet registered but are fulfilling the requirements to register with one of the six colleges whose registrants practice psychotherapy, and you are performing the controlled act, you can do so under the supervision of someone of the same profession (that is, the same college) that you intend to register with. If you are a graduate student who intends to register with CRPO, you must have an RP supervisor if you are performing the controlled act in your Ontario placement.

If you are in Ontario and not yet registered with CRPO, you will need to confirm with your placement site whether you will be performing the controlled act. If so, you need an RP supervisor to fulfill the terms of the exemption above and enable you to perform the controlled act. You can **also** have a non-RP supervisor who meets CRPO's definition (for example, a social worker or psychologist). Hours from both individuals will count towards registration as long as the supervisors meet our definition of a clinical supervisor. Please see Who Can Supervise Who?.

As an RP (Qualifying) registrant, you are a full member of CRPO and can legally perform the controlled act. As soon as you are an RP (Qualifying) registrant, you no longer need supervision from an RP to meet the exemption criteria to perform the controlled act. You could receive supervision from a psychologist alone, for example.

| **Supervisee** | **Supervisor for the controlled act** | **Supervisor for the broader scope of practice** |
|---|---|---|
| Someone fulfilling requirements to register with CRPO (for example, a student) | RP | RP, social worker/social service worker, psychologist/psychological associate, physician, nurse, occupational therapist |
| RP (Qualifying) or RP without independent practice | RP, social worker/social service worker, psychologist/psychological associate, physician, nurse, occupational therapist | RP, social worker/social service worker, psychologist/psychological associate, physician, nurse, occupational therapist |
| Graduate not registered with CRPO | N/A | RP, social worker/social service worker, psychologist/psychological |

| | | |
|---|---|---|
| | | associate, physician, nurse, occupational therapist |

### Has the clinical supervisor definition changed as a result of the substantial completion definition change?

No, the clinical supervisor definition has not changed. You can read about the criteria for providing supervision on CRPO's website.

### My practicum site expects me to be registered with CRPO before starting a practicum placement. I am concerned this will make it hard for me to find a practicum placement.

You and your program are welcome to direct practicum sites to CRPO's website. The website explains that students do not need to register before treating clients in a practicum placement. Potential practicum sites can contact CRPO directly if further clarification of the legal requirements is needed. You can also ask your program about other ways to find clients, such as in-house clinics.

### Can clients submit insurance claims for our sessions if I am not registered?

It depends on each client's policy. Please ask your client to contact their insurer directly. For more information on insurance billing, see CRPO's Practice Matters articles.

### Can I complete more than 125 direct client contact hours and 30 clinical supervision hours in my practicum?

Yes. The 125 direct client contact hours and 30 clinical supervision hours are the minimum for applying to CRPO. CRPO expects you will complete more than the minimum before graduation. CRPO encourages programs to continue providing a high number of clinical experience hours to help you develop the entry-to-practice competencies, including performing the controlled act of psychotherapy.

### What if my program requires fewer than 125 DCC hours and 30 clinical supervision hours?

Speak with your program about completing additional hours in your current placement or at a second placement.

### Can I participate in group supervision to meet the 30 required clinical supervision hours?

Yes, you can.

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### Is there a limit on how many of the 30 supervision hours can be group supervision?

No. The Registration Committee did not specify a maximum number of group supervision hours. You can complete 100% of your hours in a group format. However, you should be aware that the number of hours required to transfer out of the Qualifying category is capped at 50% group supervision hours.

### Do my 125 direct client contact hours and 30 clinical supervision hours count toward other CRPO requirements like transferring out of the Qualifying category and independent practice)?

Yes. However, you will need to submit these hours for review in your CRPO account or have your program submit them through the clinical experience recognition reporting process. The substantial completion form only confirms that you can apply. It cannot be used to have your hours accepted toward other requirements.

### What should I know about seeing clients while I wait for my application to be approved?

CRPO has a Practice Matters article on considerations when waiting for your application to be approved, including what to call yourself and how to represent yourself transparently to clients.

## REPORTING TO CRPO

### How will my program tell CRPO that I am eligible to apply?

Your program must complete CRPO's substantial completion form. If you are in a recognized program, your program can send this form instead of a transcript. If you are in a non-recognized program, your program must also send a transcript to confirm the courses you completed.

You are responsible for asking your program to send the substantial completion form to CRPO. You cannot submit your application until CRPO receives and processes the documentation from your program.

After you finish all program requirements, ask your program to send CRPO a letter or final transcript. CRPO requires this documentation to confirm your eligibility for the Registration Examination.

After you register with CRPO, upload your Direct Client Contact Confirmation and Clinical Supervisor Attestation forms to your CRPO account. Staff will review them. If your program has clinical experience recognition, it will report your hours instead, as explained below.

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### Will a program with clinical experience recognition still report my final practicum hours to CRPO?

Yes, the clinical experience recognition reporting process will stay the same. Your program can send the substantial completion form once you meet the requirements to apply. After you finish all practicum hours, your program will report your final clinical experience totals to CRPO.