



## Draft<sup>1</sup> Framework

### For Reviewing and Recognizing Psychotherapy Education & Training Programs

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<sup>1</sup> This document is still considered a “draft”, as it will go before Council for approval in May 2013.

## I. Preamble

The transitional Council, College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario was established in 2009 under the *Regulated Health Professions Act, 1991 (RHPA)* and the *Psychotherapy Act, 2007* to regulate psychotherapists in the public interest. The RHPA model for professional self-regulation supports a strong public protection mandate: practitioners are expected to be competent, ethical and accountable.

In order to accomplish this mandate, the transitional Council has drafted three foundational regulations required for proclamation of the remaining provisions of the *Psychotherapy Act* and creation of the College: the Professional Misconduct, Quality Assurance and Registration Regulations.

The Professional Misconduct Regulation defines parameters of professional practice, identifying specific activities that constitute misconduct, which could trigger disciplinary action. Provisions cover a wide range of professional activities, from record-keeping to advertising and billing practices, as well as unacceptable behaviours, such as abuse of a client or client's representative and inappropriate use of titles.

The Quality Assurance Regulation provides the framework for developing the College's quality assurance program, a statutory program designed to support members' continuing competence and quality improvement through on-going professional development.

The draft Registration Regulation sets out the requirements for obtaining and maintaining registration with the College. It also creates a time-limited route to entry known as '[grandparenting](#)' for established practitioners. This process was developed to protect ongoing client-therapist relationships, so that critical mental health services are not interrupted when the Act is proclaimed.

An earlier version of the draft Registration Regulation established requirements for Registered Mental Health Therapists (RMHTs); however, in November 2012, the Ministry of Health and Long-Term Care informed the College it could not support the registration of the practitioners proposed for that category. The ministry will seek another solution in the public interest for those practitioners who engage in the controlled act of psychotherapy and who will not be regulated by this college (or one of the other colleges whose members are authorized to perform the controlled act of psychotherapy).

As a result of this significant change, Council will defer further consideration of the RMHT title and reserve it for future use. The implication for psychotherapy education and training programs is that the College will focus solely on programs whose graduates are expected to seek registration with the College as Registered Psychotherapists.

The draft Registration Regulation establishes four categories of members:

- Registered Psychotherapist (RP)
- Temporary
- Inactive
- Qualifying.

The Registration Regulation also describes education and training requirements for applicants who will be seeking registration with the College via the regular route to registration (i.e. not grandparenting). It is these requirements that are relevant to education and training programs.

## II. Values and Philosophy

The fundamental values of the College are reflected in its Vision and Mission Statements, Code of Ethics and three foundational regulations described above.

### ***Our Mission***

*To develop standards and procedures to regulate psychotherapists in the public interest, striving to ensure competent and ethical practice within a professional accountability framework.*

### ***Our Vision***

*Leadership in professional self-regulation, dedicated to the principles of excellence, fairness, openness, responsiveness and respect for diversity.*

The College anticipates that education and training programs seeking Recognition will be in alignment with these core values. The College values and honours the tremendous diversity in the field of psychotherapy, and recognizes the many pedagogical methods and educational approaches employed in training, developing and mentoring practitioners. It expects to engage directly with applicants using an interactive approach in applying this Framework, and anticipates a productive evolution of this review process.

## III. Introduction

The transitional Council has developed this Framework primarily to facilitate the processing of applications for registration.

Inherent in the regulatory process is the need to assess whether applicants for registration are competent to practise the profession at entry-level. The College must determine whether the education and training program completed by an applicant has enabled her or him to achieve the required entry-to-practice competencies. This Framework will assist programs in developing or revising their curricula, and will facilitate their application for Recognition by the College. In addition, it may help students select a program that meets the requirements of the College.

### **Education & Training Requirements for registration as a Registered Psychotherapist (as set out in the draft Registration Regulation)**

5.(1) 1. The applicant must have successfully completed:

- i. a structured, coherent program of education and training in psychotherapy which has as a prerequisite an undergraduate degree and which includes 360 hours of training and education central to the practice of psychotherapy, which hours exclude direct client contact hours and clinical supervision hours, recognized by the Registration Committee or by a body that is approved by the Registration Committee, or

- ii. a master's degree, which includes at least 10 semester courses (360 hours) of training and education central to the practice of psychotherapy, which hours exclude direct client contact hours and clinical supervision hours, recognized by the Registration Committee or by a body that is approved by the Registration Committee, or
- iii a program in Indigenous practice of psychotherapy recognized by the Registration Committee or by a body that is approved by the Registration Committee, or
- iv. a program that is deemed by the Registration Committee to be substantially equivalent to a program referred to in subparagraph i or ii, or education and training that may be comprised of one or more programs, that when viewed in its entirety, is deemed by the Registration Committee to be substantially equivalent to a program referred to in subparagraph i or ii.

The Registration Committee or a body approved by the Registration Committee shall not recognize a program unless one of its core components is to develop competency in the safe and effective use of self in the psychotherapeutic relationship.

### **Clinical Experience Requirements for registration as a Registered Psychotherapist (as set out in the draft Registration Regulation)**

5.(1) 3. The applicant must have successfully completed clinical experience that includes at least 450 direct client contact hours and at least 100 hours of clinical supervision related to these client contact hours. This clinical experience must not commence before the commencement of the educational program referred to in paragraph 1.

**Note:** Some or all of these requirements may be delivered by the Education & Training program. When the full clinical experience requirements are not delivered by the program, a graduate may apply for registration in the Qualifying category, and work toward achieving the required number of hours of direct client contact and clinical supervision.

Although the primary purpose of the Framework is to support the Registration Committee or its delegates in the review process, it is also designed to assist faculty of education and training programs to evaluate their programs. Underpinning the development of this Framework are the education and training requirements set out in the Registration Regulation and entry-to-practice Competency Profile for RPs.

The Council is committed to developing criteria and review processes that are transparent, objective, impartial, and fair. It anticipates that the review and assessment of applications or Recognition may be administered by an arms-length, third party organization, and that independent reviewers will be involved. The transitional Council recognizes that its work is evolutionary and will continue to develop during and after the transitional period.

Programs seeking Recognition by the College will be asked to demonstrate how their students learn and how they achieve entry-to-practice competencies. This means that programs must

begin with a clear picture of what is important for students to be able to do, then organize the curriculum, instruction, and assessment to ensure this learning takes place.

## **IV. Commitment to Good Practice**

Although the College is not establishing a formal accreditation process, it is committed to a Review and Recognition process that is consistent with good practices. The process is designed to be transparent, impartial, objective and fair, and to incorporate the principle of quality assurance.

## **V. Overview of the Application Process**

There are two stages to the review process: an initial administrative review and a comprehensive review and assessment of the education and training program.

### ***Stage 1***

To begin this process, psychotherapy education and training programs seeking Recognition by the College must submit a fully completed application form and other required information. The College will create an application package that can be viewed, completed and submitted electronically along with an application fee payable to the College.

#### ***Application Package***

**The application package will include the following:**

- **Completed Application form**
- **Statutory Declaration attesting that the information and supporting materials provided are complete and accurate**
- **Completed Competencies Mapping Form**
- **Application Fee**
- **Supporting documents: in completing the application, programs will be asked to reference various documents, policies, course descriptions, syllabi, student guides, faculty biographies (see Section VI), etc. These must be appropriately referenced in the Application and Competencies Mapping Form and included with the submission.**
- **Evidence of accreditation or other recognition: programs are encouraged to submit evidence of any previous recognition, approval or accreditation obtained through another process. This evidence, if relevant to the practice of psychotherapy, may provide additional support for the application. It will not, however, preclude a thorough review of the application, nor will it necessarily lend any additional weight or implied authority.**

Receipt of the application will be acknowledged.

An initial review of the submission will take place to determine whether it is complete and provides sufficient evidence to support a more thorough review. Questions may be asked of applicants at this stage; if answered satisfactorily, the review process will enter its second stage. If not answered satisfactorily, the submission package and the application fee (less a reasonable administration charge) will be returned to the applicant with written reasons explaining why the application is being returned.

## **Stage 2**

A more detailed review will then take place. Programs will be assessed primarily against an identified subset of entry-to-practice competencies established for Registered Psychotherapists (RPs).

### **ETP Competency Profile**

The [Entry-to-Practice Competency Profile for Registered Psychotherapists](#) lists the competencies that must be possessed by individuals entering the profession for the first time, in order for them to practise safely, effectively and ethically across a variety of practice settings.

The Profile identifies five general areas of competence for practitioners at entr-to-practice:

1. Foundations
2. Collegial and Interprofessional Relationships
3. Professional Responsibilities
4. Therapeutic Process
5. Professional Literature and Applied Research

For the purposes of programs seeking Recognition, the *Competency Profile* has been reworked from the perspective of an education and training program and reduced in number to focus on key competencies likely developed within an education and training setting (other competencies may be developed prior to enrolment, or in clinical placements or with clinical supervision). The Competencies Mapping Form presents the subset of competencies that education and training programs are to focus on.

At this stage, the reviewers may request clarification or additional information, and may ask for supporting materials referenced in the application.

If a request for clarification or additional information cannot be met within the specified period, the applicant will be advised to withdraw the application. It is expected that three reviewers who are members of the profession will review and assess each application independently. Collectively, they will discuss their findings and make a recommendation to the College to recognize a program or to defer Recognition. It is not possible to predict in advance how long

the process will take but all efforts will be made to deal with applications as expeditiously as possible.

In the event that a program is not recommended for Recognition, a report will be provided to the program outlining deficiencies, and identifying areas for improvement. When appropriate changes are implemented, programs may then submit a new application.

### **Reviewers**

**The College expects to recruit and train reviewers, most likely experienced psychotherapists who understand curriculum development, student learning and competency development. The College will be sensitive to the diversity of the profession in selecting reviewers; reviewers will be bound by strict confidentiality requirements.**

### **The Outcome**

Once the review has been completed, a written report will be prepared for consideration by the Registration Committee. The report will make one of the following recommendations:

1. That Recognition be granted.

The report will identify the date of Recognition; students graduating from the program after that date may correctly claim to have graduated from an education and training program recognized by the College.

2. That Recognition not be granted at this time.

Recognition will be deferred where, in the opinion of the Registration Committee, there is insufficient evidence that the eligibility criteria have been met. Requirements for meeting the criteria will be clearly stated in the report and a reasonable time provided for the criteria to be met. If no response is received within that time period, the application will be deemed to have lapsed.

Recognition will not be granted until the education and training program has submitted additional evidence demonstrating that all outstanding issues have been met.

The outcome of the Review and Recognition process, as evaluated by Registration Committee will be communicated to the program. When Recognition has been granted, the College will update its list of Recognized Programs and inform stakeholders.

Recognition status will be granted for a period of five years, after which the program must submit a new application for Recognition.

## **VI. Organizational Attributes of Recognized Education & Training Programs**

The following are *suggested* organizational attributes that may indicate a program is capable of developing the entry-to-practice competencies in students. These attributes will assist reviewers in forming a comprehensive understanding of the program.

1. At the time of application, a minimum of two cohorts has graduated from the training program;
2. The training program has no fewer than three core faculty members;
3. Faculty members are academically, professionally, and experientially qualified, and sufficient in number to achieve the education and training goals of the program;
4. The program's staffing structure and policies are clearly spelled out;
5. Program faculty has regular meetings and consultations;
6. The program shows intent to address objectivity, transparency, and fairness by publishing its policies and procedures related to the training and education of students;
7. Program faculty engages in regular review of the program, with input from students and, especially, reference to student competency outcomes;
8. Faculty, students and supervisors subscribe to a published code of ethics and professional practice standards;
9. The program has established policies and procedures by which it defines and reviews formal student complaints; and
10. An undergraduate degree is required for admission to the program.

## **VII. Key Components of Recognized Education & Training Programs**

Applicants must provide evidence of the following:

1. Teaching/learning practices and learning environment that support the achievement of the education and training goals of the program;
2. Regular review of the entry-to-practice Competency Profile and other registration requirements of the College to determine whether students can reasonably be expected to successfully enter the profession;
3. Program mission, philosophy, goals and educational outcomes;
4. Admission criteria and processes;
5. Prior Learning Assessment (PLA) processes, if employed;
6. Program delivery, e.g. lectures, group learning, etc.;
7. Teaching philosophies/methods;
8. Faculty and supervisor qualifications;
9. Program evaluation (including student feedback);
10. Program content as it relates to entry-to-practice registration requirements for RPs:



- 10.1. Curriculum [see Introduction re draft Registration Regulation, provision 5.(1) 1.];
- 10.2. Demonstration that the program develops student competency in the Safe and Effective Use of Self in the therapeutic relationship;
- 10.3 Direct client contact hours and clinical supervision hours [see Introduction re draft Registration Regulation, provision 5.(1) 3.].

Programs **must** offer the education and training requirements set out in provision 5(1)1 of the Registration Regulation in order to be Recognized. In addition, programs **may** meet some or all of the clinical experience requirements set out in 5(1)3. Graduates of programs that do not deliver the full client contact and clinical supervision hours required for registration may seek registration in the Qualifying category.

Programs will be asked to indicate whether their program achieves the education and training requirements, and some or all of the clinical experience requirements (direct client contact hours, hours of clinical supervision).

## VIII. Mapping Competencies

Programs applying for Recognition will attach a completed Competencies Mapping Form to show how components of the program achieve the identified subset of entry-to-practice Competencies for RPs.

## IX. Maintenance and Renewal of Recognition

Recognition will continue for five years, provided that all substantive program recognition criteria continue to be met, and the College is informed in advance of all proposed significant changes to the program.

A program is required to apply for renewal of Recognition before its current term of recognition expires. Programs will be given sufficient notice of renewal requirements and procedure prior to their expiry date

## X. Resources

- a. [www.collegeofpsychotherapists.on.ca](http://www.collegeofpsychotherapists.on.ca)
- b. Draft Registration Regulation
- c. The Entry-to-Practice Competency Profile for Registered Psychotherapists
- d. Professional Misconduct Regulation
- e. Code of Ethics
- f. Quality Assurance Regulation; Quality Assurance Program (when available)
- g. *Psychotherapy Act, 2007*
- h. Application Form (to be created)

- i. Competencies Mapping Form (to be created)

## **XI. Acknowledgements**

The profession in Ontario is transitioning to self-regulation under the RHPA and establishing a regulatory college with a strong mandate of public protection. In developing this Framework, the transitional Council has learned from the knowledge, skills, judgment and experience of others, including the following:

- *CCPA Accreditation Standards*, Canadian Counselling and Psychotherapy Association
- *Accreditation of Training Courses including the Core Curriculum* ©, British Association for Counselling and Psychotherapy (used with permission)
- *Accreditation Standards*, Commission on Accreditation for Marriage and Family Therapy Education, American Association for Marriage and Family Therapy
- *ASPA – Member Code of Good Practice*, Association of Specialized and Professional Accreditors.
- *AAAC Guidelines for Good Practice*, Association of Accrediting Agencies of Canada