

From: College of Registered Psychotherapists of Ontario

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To: newsletter@cacpt.com

Subject: November Communiqué 2020



Communiqué

November 2020

[version française](#)

This month: Survey results on Record-Keeping, Annual Report, Practice Matters, Billing and more.

Coronavirus Resources

Looking for information, resources and advice about your practice during the coronavirus pandemic? [We've got all that on our website](#), plus FAQs we're updating all the time.

Webinar: How to Expect the Unexpected in Online Practice



As a psychotherapist, you can't always predict what's going to happen in a therapy session when you're practicing remotely. So how do you prepare for the unexpected? Join Talia Singer, PhD, RN, RP for a lively one-hour webinar about the intersection of ethical standards and practical decision-making in an online world. She'll explore how to be mindful of boundaries in the unbounded space of electronic practice, discuss practical examples of crossing the invisible line online, highlight the power dynamics present in the online environment, and answer burning questions you may have.

This event is taking place live on Wednesday, December 4, 12:00 to 1:00 pm. [Register](#)

[here](#) to secure your seat. Questions? Email s.hikel@crpo.ca

Practice Matters: Out of Province Practise related questions

Question: I practise in Ontario but have a client outside of Ontario who wants to work with me.

Whether a client resides in Ontario or in another jurisdiction, registrants may provide services using communications technologies as long as:

- they are able to do so competently and in a manner that abides by the Professional Practice Standards;
- there is no law, regulation or standard in the other jurisdiction that would restrict or prohibit the registrant from providing services to a client located in that jurisdiction; and
- they have appropriate liability insurance coverage considering the particular technologies used to provide services, the risks these technologies may present, and the possibility that the registrant's practice will cross into other jurisdictions.

Registrants who provide psychotherapy using communications technologies (e.g. phone, video conference, etc.) have an electronic practice. Professional Practice Standard 3.4: Electronic Practice and the accompanying Guideline set out expectations for registrants who engage in electronic practice, some of which are highlighted below.

Registrants who wish to work with a client located in another jurisdiction must determine whether any law or regulation in that jurisdiction that would prevent them from providing therapy to the client. This might require, for example, that registrants investigate whether the practice of psychotherapy or counselling is regulated in the client's jurisdiction and if so, that the registrant makes inquiries with the regulatory body there.

To an extent, a communications platform is its own therapeutic milieu that influences the therapeutic relationship and the therapy itself. Being able to leverage this therapeutic milieu safely and to the benefit of clients is an important skill. Familiarity and comfort with the technologies that are used in electronic practice can help registrants meet their obligations with respect to confidentiality and enable them to resolve technical issues that might arise during a session.

Before any therapy is provided, registrants must first evaluate the appropriateness of therapy, given the nature of the client's concerns, their ability to access technologies safely and privately, and their overall comfort and capability with communications technologies. Therapists must also consider whether providing therapy in this manner would present a risk of harm to a client in light of the client's symptoms and individual

risk factors, for example safety in the home or possibility of adverse reaction during therapy.

There are added considerations for the informed consent process. For example, registrants are expected to enter into a contract with clients before providing services. In addition, therapists must inform clients of the technologies that will be used and discuss the risks to confidentiality that these technologies may present.

Can I be registered with CRPO but be located in another jurisdiction?

Residence in Ontario is not required in order to register with CRPO.

If a therapist who is regulated with CRPO is located outside Ontario, they will need to assure there is no law, regulation or accepted standard in that jurisdiction that would prevent them from offering services while in that jurisdiction. This applies whether the therapist is working with Ontario-based clients or clients in another jurisdiction.

Question: I am not in Ontario but I have a client in Ontario who wants to work with me.

CRPO does not require practitioners who reside in another jurisdiction to become registered in order to work with a client in Ontario providing:

- the therapist does not intend to advertise or otherwise promote their services in Ontario; and
- Ontario-based clients do not form a substantial proportion of the therapist's workload

If any of these factors were to change, CRPO would revisit the facts and consider whether the therapist should apply for registration, even on a temporary basis.

In Ontario, non-registrants cannot use the title "psychotherapist" or hold themselves out as a psychotherapist. If you use the title or hold yourself out as a psychotherapist in your home jurisdiction, and your connection to Ontario is insignificant, CRPO will not take the position that you are using the title or holding out in Ontario. However, if your connection to Ontario is substantial (e.g. your advertising focuses on Ontario, a significant number of your clients are in Ontario, or you are regularly physically present in Ontario), you would not be able to use the title psychotherapist or hold yourself out as a psychotherapist unless you become regulated in Ontario.

In addition, non-registrants cannot perform the controlled act of psychotherapy in Ontario, defined as:

Treating, 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.

Non-registrants cannot perform this act on clients in Ontario, except in cases of emergency or where another exception applies (e.g. indigenous or spiritual healing). For information about the controlled act, see our web site.

For more information about registration please contact the Registration Department.

If you have other practice-related questions please contact practice@crpo.ca.

Administrative Staff and Billing



Do you practise in a setting where an administrative staff-person bills clients or insurance providers for you? If your answer is yes, this information is for you. This situation often occurs for registrants who bill through the Health Claims for Auto Insurance (HCAI) system.

Registrants are required to issue accurate documentation at all times. Honest representation is expected when communicating with clients and third-party payors, even if the registrant is not the person who issued the invoice. This includes information about the date and cost of services provided, client name, type of service provided, registration category and any other information used in the billing process. **Billing errors or inaccuracies made by staff are the responsibility of the registrant who provided the psychotherapy services.**

There are serious consequences for issuing false or inaccurate documentation which could include a College investigation and possible discipline hearing. Registrants may be delisted from insurance providers thereby limiting clients' access to services. Finally, your actions may diminish the public's trust in the profession of psychotherapy.

Here are some recommendations to maintain clear, accurate and honest billing practices:

1. Be very cautious about working for an employer who is not transparent about how your services are being billed.
 2. Provide extensive and ongoing training to staff about billing requirements. Training might include information from [CRPO's Professional Practice Standards](#) or [CRPO's Financial Records Checklist](#).
 3. Review documentation before applying your signature. Registrants should never allow a staff person to apply their signature to a document the registrant has never seen.
 4. Check in often. Schedule time on a regular basis to review forms and invoices being issued.
 5. If you discover someone engaging in inaccurate, improper or unauthorized billing on your behalf, immediately take steps to correct errors, provide instruction and prevent the situation from recurring.
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Results of Record-Keeping Survey

In September's Communiqué, we sent out a short survey on designating a health information custodian successor. Thank you to all who responded! Here are highlights of the results:

- 173 RPs responded
- 131 are primarily in solo private practice
- 145 are the custodian of client records
- 73 have designated a client record successor in writing, 76 have not, and 21 said their employer is the custodian of client health records

Registrants are encouraged to plan who takes custody of client records in the event of incapacity, death, or other end to practice. It is preferable for the successor to be a Registered Psychotherapist or other regulated health professional. However, the successor may be another person, for example, a member of the registrant's family. This [resource from Ontario's Information and Privacy Commissioner](#) has useful information on avoiding abandoned health records.

CRPO will be adding questions to the annual renewal and resignation forms collecting the name and contact information of health information custodian successors. CRPO will not share this information without consent. In the event a client reaches out to CRPO seeking access to their record and the registrant is unreachable, CRPO may contact the successor regarding the request for access.

Registered in 2016 or 2018? What are your PD Requirements?

Your PD requirements are due **November 30, 2020**.

Here is a list of what must be submitted:

1. At least one Self-Assessment that was completed sometime between your initial date of registration and November 30, 2020.
2. A Learning Plan that includes your professional development goals with at least one goal having the action plan and reflection parts completed.
3. A Learning Record that reflects your engagement in at least 80 hours of learning activities if you are a 2016 registrant and 40 hours of learning activities if you are a 2018 registrant. These hours must have occurred between your initial date of registration and November 30, 2020. In addition, ensure you have at least one didactic and at least one experiential activity.

Need help or have questions? Please contact QA@crpo.ca or check our [FAQ](#)

Missed the virtual town hall? WE GOT YOU

Click [here](#) to access the recording.

Annual Report



CRPO's 2019 – 2020 [Annual Report](#) is now available. The report reviews highlights from the past year, including five key areas CRPO worked to maintain public safety.

Council



The next meeting of CRPO Council will take place on **November 20, 2020**. Want to attend? Register ahead of time and review the [guidelines on attendance](#).

Open for Business

A reminder that, although the CRPO offices are physically closed and staff are working

offsite, our day-to-day business is ongoing. This includes processing registration applications. Staff are currently reviewing applications that were submitted in September. Be sure to [follow us on Facebook](#) where we post updates about which batch of applications we're reviewing.



CRPO is now on [Twitter](#), [Facebook](#) and [LinkedIn](#).
Follow our feed for the latest on new resources, Council election updates, governance decisions and more!

Please do not unsubscribe. CRPO uses email to communicate with registrants about important College updates. If you choose to unsubscribe, it is then your responsibility to regularly check our website to keep yourself informed about your College obligations. It is the responsibility of each registrant to make sure CRPO has your current contact information, updated within 30 days of a change, and ensure that the organization you work for does not block CRPO emails.

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