

STOP PSYCHOTHERAPY TAKEOVER (SPT)

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c/o 279 Columbus Avenue

Ottawa, ON K1K 1P3



March 15, 2016

College of Registered Psychotherapists of Ontario

163 Queen Street East, Fourth Floor

Toronto ON M5A 1S1

Attn: Registrar and Council

Dear Sir/Madam:

Cease and Desist Letters to Psychotherapists

According to the CRPO January 2016 Communiqué, your College has sent out some 40 or more Cease and Desist letters to lawfully practicing psychotherapists in Ontario.

We believe that prohibition of psychotherapy promotion and provision by those choosing not to become Members of your College was/is entirely unlawful and violates the *Regulated Health Professions Act (RHPA)*, 1991.

In fact, we are in possession of documentation that seems to make it clear that CRPO was advised by Ministry of Health and Long-Term Care bureaucrats in 2014, as well as in 2015 during Inter-College Psychotherapy Group meetings, that imposition on any person who chooses to offer psychotherapy and promote themselves as psychotherapists is forbidden by the *RHPA*. It is clear from the law that the only restriction is that a psychotherapist is not permitted to hold themselves out as being 'Registered' or a member of your College.

The documentation we have accessed indicates that you were advised that:

- While the title of *Registered* Psychotherapist is currently restricted to members of the College of Registered Psychotherapist and Registered Mental Health Therapists of Ontario (CRPRMHTO) only, practitioners may continue to provide psychotherapy services to patients. Furthermore, nothing prevents non-members from promoting those services to the patients and the public.



- It has never been the intention that *Act (RHPA)* regulate professionals who, while they may provide services that fall under the broad range of psychotherapeutic techniques, are not necessarily psychotherapists (e.g., marriage counsellors, etc). Under the *RHPA*'s overlapping scopes of practice, there is no prohibition against any unregulated practitioner performing services within a regulated profession's scope of practice.

While the *Psychotherapy Act* may appear to make the title psychotherapist a 'restricted' title, the fact is that this would be void on its face because the superior *RHPA* prevents this sort of monopoly activity by any College.

We believe that it is clearly your job to know and understand the limitations imposed by superior laws, especially when it is clear that the *Psychotherapy Act* far exceeds the level of imposition on trade and commerce and personal liberties permitted by the *RHPA, 1991*.

We expect that in view of your violation of the *RHPA, 1991* and the Constitution of Canada which informs the *RHPA, 1991*, you will take immediate steps to withdraw all Cease and Desist letters forwarded to non-members of your College by your Council.

Please provide a date by which you intend to have this accomplished and please provide proof that this has been done.

Sincerely,



Grace Joubarne, Christine Massey
Co-founders, Stop Psychotherapy Takeover

cc: Dr. Eric Hoskins, Minister of Health and Long-Term Care, Premier Kathleen Wynne, Policy Analysts—Douglas Ross, John Amodeo, Allison Henry, Derek Cheung, Lauren Eggar, Stephen Cheng.