

MORE EXAMPLES OF INCONSISTENCIES BETWEEN MINISTRY OF HEALTH INFORMATION AND CRPOs STATEMENTS

1. As the MOH officials started succumbing to the mind-numbing antics of the former Registrar of the CRPO in 2015, suddenly in MOH officials started to suggest that the now former Registrar, Joyce Rowlands, could define the legislation's terms (psychotherapeutic techniques, serious, therapeutic relationship, etc) as a way of setting *criteria* for a 'controlled act of psychotherapy'. [notice the unilateral changes made to the spirit and intent of the law itself: a controlled act is therefore no longer a specific, identifiable, inherently dangerous technique, but instead, a bunch of subjective criteria]

Rowlands to practitioners: we are not required to define the terms used in the legislation...the courts will do that. This narrative continued in April 21st, 2016 when the CRPO was suggesting the controlled act was about 'serious' conditions (see 12:42 minute mark of 2016 CRPO Webinar compilation of statements at https://youtu.be/o_UQ9bhY2F0). At the 26:29 minute mark, the CRPO is advising anyone who might 'stray' into the controlled act territory to join the College as 'insurance' against being thrown out of work or becoming the CRPO's test court case!

2. Ministry Officials tell Rowlands: *"While the title [Registered Psychotherapist] is currently restricted to members of the College of Registered Psychotherapists... practitioners may continue to provide psychotherapy services to patients. FURTHERMORE, NOTHING PREVENTS THEM (non-members) FROM PROMOTING THOSE SERVICES TO THE PATIENTS AND THE PUBLIC."*

Rowlands however told the frightened and confused practitioners: *'The scope of practice of psychotherapy **will not** be exclusive to members of the new College of Registered Psychotherapists of Ontario or to members of other colleges.'* Then she adds: *"Any person can provide services that fall within the scope of practice of psychotherapy, so long as they do not....'hold themselves out as qualified to practice as a psychotherapist in Ontario or perform the controlled act of psychotherapy.'* The problem is that psychotherapy is defined so broadly that any human interaction is now 'psychotherapy'.

Rowlands then sent Cease and Desist letters to those safe and innocent persons promoting their psychotherapy services to the public in direct contradiction to MOH advisement. Further, **Rowlands wrote that family therapy, marriage counselling and spiritual care were the exclusive domain of Registered Psychotherapists, again, even though the Ministry was telling her that she could not restrict non-members from providing their services as they saw fit and that it was not the Ministry's intention to regulate marriage counsellors, etc.**

3. The Ministry officials and the Minister's advisors stated: the psychotherapy profession has never been able to legitimately identify a core body of knowledge common to all psychotherapy practice and this must be done before proclamation of the controlled act of psychotherapy (once the dangerous 'act' within the practice of psychotherapy is actually identified).

In 2015, Rowlands told practitioners: the College established 4 core competencies, but her answer to enquiries about what they were received a response refusing to explain the core competencies. In 2016, there are now 22 core competencies, all centered in the **psychiatric**

framework. 'Professional training' has suddenly manifested, with that approved training being centered in **psychological and psychiatric** theories and frameworks, such as Gestalt.

4. Ministry officials stated: There are no academic degrees in other disciplines that could be said to be essential to training in psychotherapy. Membership in the new College **cannot be based on academic credentials**, therefore core knowledge and skills to encompass the broad range of approaches must be defined and transparent.

Up to 2015, Rowlands tells practitioners: **all members must have a Master's Degree or equivalent, despite there being NO university degree program associated with psychotherapy, and no Masters Degree program in any field that remotely overlaps with psychotherapy, even if psychotherapy could be defined.** The ONLY training approved by the College in 2015 was Gestalt (**psychological**) 5-year program. Now there are 5 more 'approved programs', all based in **psychological/psychiatric** theory and framework. The primary and only real criteria for membership in the new College is a Masters Degree or 'equivalent'.

5. The Ministry stated: 'creeping credentialism' must be avoided; **there cannot be a reliance on academic credentials as a criteria for membership**, such as a requirement for a Master's Degree.

Rowlands told practitioners: 2,000 people had been 'grandfathered' into the CRPO by mid-2015. They had a Master's degree (or equivalent) despite the grandfathered members not having a single common denominator in psychotherapy-related or health-related education among them. At last count, only 47 applicants were to write the manufactured-just-in-time psychotherapy exams. **Seven years after passing of Psychotherapy Act, Master's degrees in fields not remotely associated with psychotherapy, had ended up as default solutions for membership criteria because a common body of knowledge for training in psychotherapy could not be agreed upon.**

6. Ministry officials stated: unique sets of skills, core bodies of knowledge and well-defined psychotherapy specific training and approaches **must be identified and made clear to the public and healthcare practitioners.** CRPO must be transparent with the public and provide clear answers so all practitioners know how the law affects them.

Rowlands refused to answer questions about non-medical model healthcare approaches, refused to identify the core 'acts' amongst the various non-medical healthcare approaches to be deemed a '*controlled act of psychotherapy*' and refused to answer questions as to the reliance the CRPO will place on the new definition of psychotherapy conveniently installed in the 2006 and 2013 editions of the American Psychological Association's Dictionaries of Psychology. She has persistently refused to answer any questions about who is affected, except to tell everyone that if they are caught engaging in the *controlled act of psychotherapy* they will be prosecuted. It is up to a practitioner to figure out for themselves if they are in compliance she claimed!

7. Ministry stated: A protected title or titles must be understandable to the public, and there **should be a recognized link between the title(s) and the services being provided.**

Rowlands led practitioners to believe: Whether you are a family therapist, marriage counselor, spiritual counselors or anyone else, **you must join the CRPO to continue to work, you must use**

the title Registered Psychotherapist, and you must adhere to the psychotherapy scope of practice. [Shortly, no one will know if they are getting a genuine spiritual care counselor or a psychotherapist and a mental illness diagnosis.]

8. HPRAC (advisors) to Minister, 2006: the intent of the RHPA: "*Anyone, with or without credentials, may practice psychotherapy and call him/herself a psychotherapist.*" RHPA was designed specifically to encourage all practitioners to promote and practice their chosen profession freely and call themselves what they wish in order to keep healthcare in the public domain...and to do so without imposition of self-interest groups. Professions are to share overlapping scopes of practice without restriction, except in the 2-3 most dangerous areas of healthcare.

Rowlands stated: no one can practice psychotherapy unless they join the College of Registered Psychotherapists. (CRPO sent Cease and Desist letters to those who were previously offering psychotherapy for years, but who would not join the College or could not join because they lacked the Master's or equivalent.) No unregistered practitioners can engage in psychotherapy because the entire activity and not just one 'act' within the practice of psychotherapy is 'controlled' and 'restricted'. Unregulated people will be able to provide services, as long as they do not engage in the controlled act, i.e. treat individuals with serious disorders...; do not use any restricted title or abbreviation; and do not hold themselves out as qualified to practice psychotherapy.

9. Ministry Officials stated: it was never the intention of the government to regulate family therapists, etc.

Rowlands to Family Therapists, Spiritual Care workers, marriage counsellors and others: in order to protect your titles and scopes of practice (aka, your livelihoods and the important services relied upon by your clients), you must be a Registered Psychotherapist. Family Therapy, Spiritual Care and counseling are now psychotherapy and only College members can provide psychotherapy services.

10. Ministry Officials stated: Fines, imprisonment or other penalties should not be imposed by regulation, and regulations should not shift the onus of proof of innocence to a person accused of an offence.

Rowlands stated to practitioners: (The penalty for practising psychotherapy without being a member of the College: a possible \$25,000 fine and prison time!) By virtue of refusing to join the College while insisting on the right to continue their livelihood, an unregulated practitioner is deemed automatically guilty and Rowlands says she has sent them a cease and desist letter.