

Supervision of the Controlled Act of Psychotherapy in Ontario

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 to do so.

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 an individual not yet registered but who is fulfilling requirement to register with one of the six colleges (e.g., student), and who is performing the controlled act can do so under the supervision of someone of the same profession (i.e., college) that they intend to register with. A master’s student who intends to register with CRPO must have an RP supervisor if in their Ontario placement they are performing the controlled act.

Students in Ontario who are not yet registered with CRPO will need to confirm with their placement site if they will be performing the controlled act. If so, they need an RP supervisor to fulfill the terms of the exemption above and enable them to perform the controlled act. They can ALSO have a non-RP supervisor who meets CRPO’s definition (e.g., 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.

RP (Qualifying) registrants are full members of CRPO and are therefore authorized to perform the controlled act. As soon as they are an RP (Qualifying) registrant, they no longer need supervision from an RP specifically to perform the controlled act. They could receive supervision from a psychologist alone, for example.

Students can use the Self-Assessment Tool to determine whether their work falls within the scope of practice of psychotherapy (Questions 1-3) and whether they are performing the controlled act (Questions 4-6): <https://www.crpo.ca/self-assessment-tool>

Further resources:

<https://www.crpo.ca/controlled-act-of-psychotherapy/>

<https://www.crpo.ca/controlled-act-faq/>

<https://www.crpo.ca/who-can-supervise-who/>