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Letter to Insurance Company

May 8, 2025

To Whom It May Concern:

I am reaching out on behalf of the Ontario College of Social Workers and Social Service Workers (OCSWSSW) to provide clarification about the provision of psychotherapy services and the use of the title "psychotherapist" by OCSWSSW registrants, as well as share information regarding scope of practice.

The OCSWSSW currently regulates over 31,000 social workers and social service workers, the largest group of regulated mental health professionals in Ontario.

To provide some context, the OCSWSSW, as well as the Ontario Association of Social Workers (OASW) and the Ontario Social Service Worker Association (OSSWA), have received numerous reports related to insurance claims for psychotherapy services provided by social workers and social service workers being denied by insurance providers. The OCSWSSW, OASW and OSSWA share the concern that refusal of these claims creates barriers to client care and thus is a public protection concern.

We are also troubled by the dissemination of inaccurate information about the role of social workers and social service workers and the scope of their practice – describing social workers and social service workers' role in a very limited way as one of helping individuals and families through referrals to community resources, for example. This description omits, among other things, our registrants' important role in providing psychotherapy and counselling to treat stress, relationships, and mental health disorders.

We have also received reports from registrants who have had claims denied because they do not have a Masters of Social Work degree, although they do have a Bachelor of Social Work degree or a Diploma of Social Service Work and are registered with the OCSWSSW. The OCSWSSW makes no distinction for registration between these educational qualifications; registrants who do not have a Masters of Social Work degree are allowed to practise the controlled act of psychotherapy. Additional reports received state that insurance companies are requiring social workers and social service workers to be under supervision, for example by a psychologist, if they offer psychotherapy services. The



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 ${\tt OCSWSSW}\ does\ not\ place\ any\ supervisory\ restrictions\ on\ registrants'\ practising\ {\tt ocswssw.org}$ psychotherapy.

By way of background, the controlled act of psychotherapy was proclaimed in force on December 30, 2017, becoming one of fourteen controlled acts defined in the Regulated Health Professions Act, 1991 (RHPA). A controlled act is an activity which is restricted to certain regulated professionals because of the risk of harm it poses to the public. Performing the controlled act of psychotherapy is currently restricted to registrants of six regulatory colleges, including OCSWSSW registrants.

This legislation means that OCSWSSW registrants may perform the controlled act of psychotherapy and use the title "psychotherapist" in compliance with certain requirements, without also being registered with the College of Registered Psychotherapists of Ontario. We are therefore requesting that insurance companies reimburse clients for psychotherapy services provided by OCSWSSW registrants.

In the midst of rising mental health concerns across Canada, I have no doubt that you will agree that it is essential to minimize barriers to mental health care, including psychotherapy services. I hope that this context assists you in reconsidering your reimbursement policies and practices.

For more information, visit the OCSWSSW's psychotherapy webpage.

Please feel free to reach out to practice@ocswssw.org if you have any questions.

Sincerely,

Denitha Breau, RN, MSN, MBA

Registrar and CEO