



Ontario College of
Social Workers and
Social Service Workers

Ordre des travailleurs
sociaux et des techniciens
en travail social de l'Ontario

250 Bloor Street E.
Suite 1000
Toronto, ON M4W 1E6

Phone: 416-972-9882
Fax: 416-972-1512
www.ocswww.org

**SUBMISSION TO THE STANDING COMMITTEE
ON SOCIAL POLICY**

**BILL 171,
*HEALTH SYSTEM IMPROVEMENTS ACT, 2006***

MADE BY:

**ONTARIO COLLEGE OF SOCIAL WORKERS
AND SOCIAL SERVICE WORKERS**

PRESENTED BY:

**Rachel Birnbaum, Ph.D., RSW, President
Glenda McDonald, M.S.W., RSW, Registrar and Chief Executive Officer
Debbie Tarshis, WeirFoulds LLP, Legal Counsel**

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**ONTARIO COLLEGE OF SOCIAL WORKERS
AND SOCIAL SERVICE WORKERS'
SUBMISSION ON BILL 171,
*HEALTH SYSTEM IMPROVEMENTS ACT, 2006***

EXECUTIVE SUMMARY

This submission is made by the Ontario College of Social Workers and Social Service Workers (College). The College is the regulatory body for social workers and social service workers in Ontario with approximately 11,500 members. The College was established by the *Social Work and Social Service Work Act, 1998* (*Social Work and Social Service Work Act* or SWSSW Act). Its mandate is to serve and protect the public interest through self-regulation of the professions of social work and social service work. The College is governed by a Council of 21 elected members and members appointed by the Lieutenant Governor in Council. The College sets entry to practice requirements for the members of both professions, approves the standards of practice for both social workers and social service workers and follows the procedures set out in the SWSSW Act to handle complaints, discipline and fitness to practise matters.

The College understands that one of the purposes of Bill 171, the *Health System Improvements Act, 2006*, as set out in Schedules Q and M, is to increase the protection of the public of Ontario by adding psychotherapy as a profession to be regulated under the *Regulated Health Professions Act, 1991* (RHPA) and by strengthening the harm clause under the RHPA. The College supports these initiatives. The College wishes to ensure, however, that Bill 171 recognizes the key role that members of this College play in the delivery of health and psychotherapy services to Ontarians and enables them to continue making that contribution by being authorized to practise psychotherapy under the legislative framework proposed by Bill 171.

The College has been an active participant in the steps leading up to the proposed regulation of psychotherapy and the proposed amendments to the RHPA. The College provided

comments in 2001 on the report by the Health Professions Regulatory Advisory Council (HPRAC), "Adjusting the Balance: A Review of the Regulated Health Professions Act". The College also actively participated in HPRAC's consultation process respecting the referral by the Minister of Health and Long-Term Care (MHLTC) on the regulation of psychotherapy and the legislative framework of the RHPA and in the MHLTC's consultation process regarding HPRAC's Report "Regulation of Health Professions in Ontario: New Directions", released on April 27, 2006.

Needless to say, the College was extremely concerned when Bill 171 was introduced and members of the College were excluded from the practice of the controlled act of psychotherapy and the use of the restricted title "psychotherapist". There are currently thousands of social workers regulated under the *Social Work and Social Service Work Act, 1998* who are competently providing psychotherapy services. Without amendments to Bill 171, this legislation, if passed, will have a serious impact on the thousands of Ontarians who currently receive psychotherapy services from members of the College.

The College is appreciative that the Minister of Health and Long-Term Care acknowledged, at the outset of the second reading debate on Bill 171, the valuable contribution made by social workers to the delivery of psychotherapy services in Ontario and committed to presenting a legislative amendment to recognize the profession and ensure that social workers who provide psychotherapy services associated with the new controlled act will continue to be able to provide these very important services in the province. The College also appreciates the Minister's commitment to circulate, and consult with us, on the amendments to accomplish this objective. While we have been working with the Ministry, to date the important public policy issues we have raised have not been resolved.

This submission will highlight the issues that, in the College's view, need to be addressed in order to ensure that people in Ontario continue to have access to the psychotherapy services they are receiving from members of the College and that nothing in Bill 171 will have the unintended impact of limiting their access to those services.

The College is seeking amendments to Bill 171 to ensure that the Bill recognises the key role played by almost 7,000 social work members currently working in settings delivering psychotherapy services and enables them to continue playing that role by being included in the proposed legislative framework under Bill 171. No one disputes that social workers have the skill, judgment, and qualifications to provide psychotherapy services and, in fact, both HPRAC and the Minister of Health and Long-Term Care have already recommended and acknowledged that social workers must be authorized to continue to provide psychotherapy services in Ontario.

Therefore, the College is seeking amendments to Bill 171 that will:

- Recognize the psychotherapy services currently provided by social workers;
- Treat social workers on an equal footing to the other regulated health professions authorized to provide psychotherapy services under Bill 171; and,
- Positively *authorize* social workers to continue to provide psychotherapy services in Ontario.

In order to accomplish these public policy objectives, the College is seeking the following amendments to Bill 171:

- 1) That Schedule Q be amended to provide positive authorization for social workers to perform the controlled act related to psychotherapy.**
- 2) That Schedule Q be amended to permit social workers to use the restricted title "psychotherapist", provided this title is used in conjunction with the restricted titles "social worker" or "registered social worker".**
- 3) That Schedule Q be amended to exempt social workers from the holding out provision in the *Psychotherapy Act, 2006*, provided they comply with the SWSSW Act, its regulations and by-laws, so that a social worker would be able to represent that he or she is qualified to practise as a psychotherapist in Ontario.**
- 4) That Schedule Q be amended so that the regulated health professionals who are authorized to perform the controlled act related to psychotherapy can use the restricted title "psychotherapist" and are exempt from the holding out provision in the *Psychotherapy Act, 2006*.**
- 5) That Schedule Q be amended to require the Council of the College of Psychotherapists of Ontario to engage in a consultation process with other Colleges whose members provide psychotherapy services before a regulation is made under section 11 of the *Psychotherapy Act, 2006*.**

- 6) That section 33 of the RHPA be amended so that registered professionals with an earned academic doctoral degree, including social workers, may use the title "doctor" in the course of providing health care, provided that the title and nature of the degree and the discipline in which the doctorate is held are clearly identified, and that the title is used together with the restricted professional title.**

Public policy is set in legislation. If it is the public policy intent to allow social workers to continue to provide psychotherapy services, this needs to be clearly reflected in the Bill. Without positive authorization for social workers to practise psychotherapy, the public will be left with the impression that social workers do not have the same knowledge, skill and judgment as do the other professions authorized to perform the Controlled Act of psychotherapy. It must be transparent to the public receiving these services that registered social workers possess the necessary qualifications, experience and regulatory accountability required to provide psychotherapy services. Social workers and their clients should be treated no differently than members of the regulated health professions providing psychotherapy services to their clients. This can only be accomplished through a positive authorization to practise, rather than an amendment that would simply exempt social workers from being prohibited from practising psychotherapy.

The case for extending the title of Psychotherapist, and being able to hold oneself out as a Psychotherapist is the same. Without an amendment authorizing social workers to use the title “Psychotherapist”, and to “hold themselves out” as a Psychotherapist, the public will be confused about who is qualified to practise psychotherapy in Ontario. Clearly that could not have been the intent of the Minister when he committed to ensuring that social workers will continue to be able to provide these very important services in the province under Bill 171. If the government is truly committed to ensuring that social workers can practise psychotherapy under Bill 171, then the appropriate amendments need to be made in order to ensure that the public policy objectives are reflected in the Bill and that their status is transparent to the public receiving those services or seeking to receive them.

As a regulatory college, our mandate is to regulate in the public interest. It is in the public interest to ensure that access to psychotherapy services is maintained. The College believes that the amendments we are recommending to Bill 171 will ensure that the public

interest will continue to be protected by making it very clear who is authorized to practise psychotherapy and to call themselves a Psychotherapist in Ontario.

SUBMISSION

I) BACKGROUND

Regulatory Role of Ontario College of Social Workers and Social Service Workers

The Ontario College of Social Workers and Social Service Workers is the regulatory College for the practice of social work and social service work in Ontario and was established on March 1, 1999 by the *Social Work and Social Service Work Act, 1998* (SWSSW Act). All of the provisions of the SWSSW Act were brought into force by August 15, 2000. The College's current membership is approximately 11,500 social workers and social service workers.

The primary duty of the College, in carrying out its objects, is to serve and protect the public interest. The objects of the College include:

- to regulate the practice of social work and social service work and to govern its members
- to develop, establish and maintain qualifications for membership in the College
- to issue certificates of registration to members of the College
- to establish and enforce professional standards and ethical standards applicable to members of the College
- to receive and investigate complaints against members of the College and to deal with issues of discipline, professional misconduct, incompetency and incapacity

The framework of self-regulation established under the SWSSW Act is similar to the framework of self-regulation provided under the RHPA which governs the regulated health professions. Under the SWSSW Act, there is a registration process for determining whether an applicant meets the qualifications for membership in the College in accordance with the requirements of the SWSSW Act and regulations made under the SWSSW Act. There is a process for complaints and mandatory reports to be filed with the College. There is a

Complaints Committee whose responsibility it is to consider and investigate complaints regarding the conduct or actions of members of the College. Matters may be referred to the Discipline Committee for a hearing to determine any allegation of professional misconduct or incompetence on the part of a member of the College. Matters may be referred to the Fitness to Practise Committee for a hearing to determine whether a member of the College is incapacitated. The Code of Ethics and Standards of Practice for members of the College, prescribed by by-law in accordance with the SWSSW Act, provide professional standards and ethical standards to which members of the College must adhere. There is a public register providing information to the public about the members, their professional status, any terms, conditions and limitations imposed on a certificate of registration, any notations of revocation, cancellation or suspension of a member's certificate of registration, and information directed to be added to the register by committees of the College, such as the results of discipline or fitness to practise proceedings.

The SWSSW Act provides a title that is restricted to the members of each profession – social worker or registered social worker and social service worker or registered social service worker. While the SWSSW Act does not legislate a scope of practice for social workers and social service workers, the College has prescribed, by by-law, a scope of practice for both professions. Each scope of practice has been recognized by the government in connection with the registration regulation made under the SWSSW Act, which defined the role of a social worker and social service worker for purposes of assessing applicants who had experience in performing the role of a social worker or social service worker.

The scope of practice of the profession of social work is the assessment, diagnosis, treatment and evaluation of individual, interpersonal and societal problems through the use of social work knowledge, skills, interventions and strategies, to assist individuals, dyads, families, groups, organizations and communities to achieve optimum psychosocial and social functioning.

The scope of practice of the profession of social service work is the assessment, treatment and evaluation of individual, interpersonal and societal problems through the use of social service work knowledge, skills, interventions and strategies, to assist individuals, dyads,

families, groups, organizations and communities to achieve optimum social functioning.¹

II) COMMENTS ON SCHEDULES Q AND M OF *THE HEALTH SYSTEM IMPROVEMENTS ACT, 2006 (BILL 171)*

The College supports the government's initiative to increase the protection of the public of Ontario by adding psychotherapy as a profession to be regulated under the RHPA. The College also supports the proposed amendment to the "harm clause" of the RHPA so that, if passed, the "harm clause" will encompass psychological harm, as well as physical harm.

The College is pleased that Minister Smitherman has made a commitment to present a legislative amendment that will recognize the profession of social work and to ensure that social workers who provide psychotherapy services associated with the new controlled act will continue to be able to provide these important services in the province.

The College believes that the legislative amendments to Bill 171 need to ensure that Bill 171 authorizes social workers to continue to provide psychotherapy services, recognizes the psychotherapy services provided by social workers and treats social workers on an equal footing to the regulated health professions. The College believes that these three objectives must be met in order to ensure continued access to the public of Ontario to psychotherapy services provided by social workers.

Set out below are the College's comments regarding Schedules Q and M of Bill 171 and the solutions proposed by the College. Set out in Schedule A of this submission is a list of the College's recommendations.

¹ Code of Ethics and Standards of Practice, Ontario College of Social Workers and Social Service Workers, 2000.

1. Regulation of Psychotherapy

Psychotherapy Act, 2006 (Schedule Q of Bill 171):

In order to appreciate the implications of the Psychotherapy Act, it is important to understand the RHPA system of regulation of health professions. The RHPA system of regulation of health professions has a number of elements: a scope of practice statement, controlled acts and a harm clause. In addition, each health profession Act has a title restriction and a holding out provision.

The first element is a scope of practice statement. The scope of practice statement, for each health profession, provides a description of a profession's activities and a frame of reference for the performance by that profession of the "controlled acts" authorized to its members.

The second element is the restriction on the persons who are authorized to perform "controlled acts". Controlled acts are those activities specifically listed in the RHPA as controlled acts. They may only be performed by a member of a regulated health profession who is authorized by a health profession Act to perform the controlled act.²

The third element is the harm clause. The harm clause prohibits a person from treating or advising a person with respect to his or her health in circumstances where it is reasonably foreseeable that serious physical harm may result from the treatment or advice. A member of a regulated health profession practising within the scope of practice of his or her profession is exempted from the harm clause.

Lastly, there is a title restricted to each regulated health profession and a prohibition from others holding themselves out as persons qualified to practise the profession.

² There is also authority for such members to delegate the performance of a controlled act to other persons or for a regulation to be made which provides an exemption.

What are the relevant provisions of Schedule Q in the context of the RHPA system and the implications for access to psychotherapy services by Ontarians? First, Schedule Q establishes a controlled act related to psychotherapy:

To treat, 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.

Schedule Q authorizes physicians, psychologists, nurses, occupational therapists and members of the new College of Psychotherapists of Ontario to perform the controlled act. As indicated above, under the RHPA, no person, other than a member of a regulated health profession who is authorized by legislation to do so, may perform a controlled act. Therefore, a legislative amendment to Bill 171 is necessary in order for social workers to be authorized to perform the controlled act related to psychotherapy.

Secondly, Schedule Q establishes the title of "psychotherapist" and "registered mental health therapist" and restricts their use to members of the new College of Psychotherapists of Ontario. Schedule Q also prohibits a person from holding himself or herself out as a person who is qualified to practise in Ontario as a psychotherapist or a registered mental health therapist. Therefore, a legislative amendment to Bill 171 is necessary in order for social workers to be permitted to use the title "psychotherapist" and to hold out that they are qualified to practise in Ontario as a psychotherapist.

Thirdly, Schedule M amends the harm clause of the RHPA by changing the current threshold for a breach of the harm clause from "serious physical harm" to "serious bodily harm". We understand that the purpose of this amendment is to add psychological harm to the scope of the harm clause. This change to the harm clause emphasizes the importance of social workers being authorized to perform the controlled act related to psychotherapy.

Social Work Practice and its Regulation:

Currently, approximately 7,000 registered social workers practise in settings which provide psychotherapeutic services. Of these, 1,200 social work members work in either full time or part time private clinical practice. Accordingly, the College estimates that thousands of Ontarians are currently receiving psychotherapeutic services from members of the College.

During the second reading debate on Bill 171, the members of the Legislative Assembly of Ontario heard that social work is the largest single discipline providing psychotherapy services in North America and that psychotherapy services in the area of adult mental health, children's mental health, marital, family and individual counselling, addictions, child welfare, and hospitals are largely provided by social workers. The members of the Legislative Assembly also learned about the wide range of settings in which social workers provide psychotherapy services. A number of letters from social workers were quoted during these debates. Included were letters from:

- a psychotherapist in private practice who works with individuals on a range of mental health issues (including family issues, separation/divorce, blended families, depression, anxiety, stress, self-esteem, parenting issues, anger management, abuse, grief issues, marital counselling, teenage problems).
- a social worker who works in a hospital as an oncology social worker and whose practice involves the provision of psychotherapy services to patients facing illnesses that include leukemia, lymphoma and multiple myeloma.
- a social worker who described the key role of social workers with respect to the delivery of children's mental health services in agencies such as Niagara Child and Youth Services, and the delivery of individual, couple, family and group services at community agencies such as Family Counselling Centre, Canadian Mental Health Association, and Niagara Region Sexual Assault Centre.

The College believes that the critical role that social workers play in delivering psychotherapeutic services to the public of Ontario has been well demonstrated through the letters, faxes and e-mails received by MPPs with respect to Bill 171.

The practice of social workers is regulated by the College under the authority of the SWSSW Act. Although social workers are not regulated under the RHPA, the primary duty of this College, just like the health regulatory Colleges, in carrying out its objects, is to serve and protect the public interest. Just like the health regulatory Colleges, the objects of the College include to regulate the practice of the professions and to govern its members, to develop, establish and maintain qualifications for membership in the College, and to establish and enforce professional standards and ethical standards applicable to members of the College. Just like the health regulatory Colleges, the College has regulation-making and by-law making authority with respect to various matters. Just like the health regulatory Colleges whose members will be authorized to provide psychotherapy services, this College intends to regulate the provision of psychotherapy services by its members in order to serve and protect the public interest.

Issue:

The College believes that, based on second reading debate, there is unanimous agreement that the exclusion of social workers from Bill 171 needs to be fixed. The College believes that there is unanimous agreement that this needs to be done so that Bill 171 will not impact on the public's access to these important services provided by social workers. The College also believes that the problem needs to be fixed in a manner that puts social workers on an equal footing to the other health professions that will be permitted to provide psychotherapy services – members of the new College of Psychotherapists of Ontario, psychologists, physicians, nurses and occupational therapists. To do otherwise will leave the public impression that social workers do not have the same knowledge, skill and judgment as do the other professions authorized to perform the controlled act related to psychotherapy. It must be transparent to the public receiving these services that registered social workers possess the necessary qualifications, experience and regulatory accountability required to provide psychotherapy services. Otherwise, members of the public will not have equal access to the services of qualified professionals – social workers.

The College believes that a critical element of the solution is to authorize social workers to perform the controlled act related to psychotherapy. This is critical because, without legal authority to perform this controlled act, members of the College would be in breach of the controlled act provision of the RHPA when they provide psychotherapy services to clients. This is also important because the scope of the harm clause is to be extended to include psychological harm.

But the College believes that this is not the only element of the RHPA system that needs to be addressed. The title restriction provision set out in the Psychotherapy Act will prevent social workers who are qualified to provide psychotherapy services from using the title "psychotherapist" or "registered mental health therapist". The holding out provision set out in the Psychotherapy Act will prevent a social worker from representing to members of the public that he or she is qualified to practise in Ontario as a psychotherapist. In HPRAC's report, "Regulation of Health Professions in Ontario: New Directions", HPRAC recommended that social workers (as well as members of the health regulatory Colleges who are qualified to practise psychotherapy) be authorized to use the title "psychotherapist". HPRAC also recommended that social workers (as well as members of the health regulatory Colleges who are qualified to practise psychotherapy) be authorized to represent that they are qualified to practise psychotherapy in Ontario. It is apparent from the letters that were quoted during the second reading debate that social workers who provide psychotherapy services describe themselves as psychotherapists.

If Schedule Q is passed, psychotherapy services will be provided by qualified professionals belonging to a number of different regulated professions. The public associates the provision of psychotherapy services with the title "psychotherapist". The College believes that it will be confusing to members of the public if those who are qualified to provide psychotherapy services cannot continue to describe themselves as "psychotherapists". The College believes that this confusion will result in limiting access to psychotherapy services.

The main purpose of the restricted title and holding out provision is to prevent unregulated practitioners from holding themselves out as qualified to practise a profession, not to limit access to services provided by those who are qualified to provide psychotherapy

services. The College believes that Schedule Q should be amended to permit those regulated professionals qualified to provide psychotherapy to use the title "psychotherapist" and to hold themselves out as qualified to provide psychotherapy.

Recommendation Nos. 1 to 4: The College recommends that:

- 1) **Schedule Q be amended to provide positive authorization for social workers to perform the controlled act related to psychotherapy.**
- 2) **Schedule Q be amended to permit social workers to use the restricted title "psychotherapist", provided this title is used in conjunction with the restricted titles "social worker" or "registered social worker".**
- 3) **Schedule Q be amended to exempt social workers from the holding out provision in the *Psychotherapy Act, 2006*, provided they comply with the SWSSW Act, its regulations and by-laws, so that a social worker would be able to represent that he or she is qualified to practise as a psychotherapist in Ontario.**
- 4) **Schedule Q be amended so that the regulated health professionals who are authorized to perform the controlled act related to psychotherapy can use the restricted title "psychotherapist" and are exempt from the holding out provision in the *Psychotherapy Act, 2006*.**

The College believes that these recommendations can be achieved by amendments to the *Regulated Health Professions Act, 1991* and the *Psychotherapy Act*.

2. Regulation-Making Authority under the Psychotherapy Act

Psychotherapy Act and Regulation-Making Authority:

Under section 11 of the *Psychotherapy Act, 2006*, the Council of the new College has authority, subject to Cabinet approval and with prior review by the Minister of Health and Long-Term Care, to make regulations prescribing therapies involving the practice of psychotherapy, governing the use of prescribed therapies and prohibiting the use of therapies other than the prescribed therapies in the course of the practice of psychotherapy. The practice of psychotherapy is defined in section 3 of the *Psychotherapy Act, 2006* as "the assessment and

treatment of cognitive, emotional or behavioural disturbances by psychotherapeutic means, delivered through a therapeutic relationship based primarily on verbal or non-verbal communication".

Issue:

HPRAC's report, "Regulation of Health Professions in Ontario: New Directions", noted that individuals currently providing psychotherapy services in Ontario include regulated professionals (social workers, psychologists, physicians, psychiatrists and nurses) and unregulated practitioners. Members of the new College of Psychotherapists of Ontario will be authorized to perform the controlled act related to psychotherapy. Through complementary amendments to the relevant health profession Acts, physicians, psychologists, nurses and occupational therapists will also be authorized to perform the controlled act related to psychotherapy. The College is hopeful that, through legislative amendments to Bill 171, social workers will also be authorized to perform the controlled act related to psychotherapy. Therefore, if Schedule Q of Bill 171 is enacted, a number of professions will be providing psychotherapy services.

The College believes that the regulation-making authority under section 11 means that the nature of the practice of psychotherapy may be further delineated through regulations made under the *Psychotherapy Act*; however, there is no formal mechanism for other regulated professions, who may be impacted by these regulations and may have important comments to make regarding them, to participate in the process.

The College believes that a consultation process prior to regulations being made under section 11 of the *Psychotherapy Act, 2006* would inform any such regulations and promote consistency with respect to the delivery of psychotherapy services. The College notes that there is precedent for a consultation process for regulations being required by legislation. Under section 95(1.4) of the Health Professions Procedural Code, health regulatory Colleges are required to circulate proposed regulations to their members at least 60 days before a regulation is made under section 95(1) of the Code. The government has also recognized a requirement for

public consultation regarding regulations to be made under the *Personal Health Information Protection Act, 2004* (section 74) and the *Local Health System Integration Act, 2006* (section 38).

Recommendation No. 5:

- 5) **The College recommends that Schedule Q be amended to require the Council of the College of Psychotherapists of Ontario to engage in a consultation process with other Colleges whose members provide psychotherapy services before a regulation is made under section 11 of the *Psychotherapy Act, 2006*.**

3. "Doctor" Title

Restrictions on Use of the Title "Doctor" under RHPA:

Under section 33 of the RHPA, the use of the title "doctor" in the course of providing or offering to provide health care to Ontarians is prohibited unless the person is a physician, dentist, psychologist, optometrist or chiropractor. Under the *Traditional Chinese Medicine Act, 2006*, a member of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario may, by regulation, be authorized to use the title "doctor". Under Schedule P of Bill 171, a naturopath will be authorized to use the title "doctor", provided that the person uses the phrase "doctor of naturopathy" immediately following his or her name.

Social Workers who have attained a Ph.D.:

A significant number of social work members of the College have attained a Ph.D., following a graduate degree, most often a Master of Social Work degree. These members use the designation "RSW" after their name, in accordance with the registration regulation made under the *Social Work and Social Service Work Act, 1998*, and thereby inform the public that they are registered social workers. Under section 33 of the RHPA, these members are not entitled to use the title "doctor" in the course of providing or offering to provide health care.

Issue:

Like other professions, the social work members of the College who have attained a Ph.D., often combine clinical practice with research, which is critical to ensure that knowledge is transferred from research into clinical care. Clinical social work practice often occurs in health care facilities or in private practice where a client may assume that health care is being provided. The College notes that the use of the doctor title in Ontario is more restrictive than in other jurisdictions and agrees with the recommendations of HPRAC in its report, "Regulation of Health Professions in Ontario: New Directions", that the restrictions on the use of the title "doctor" should be amended.

Recommendation No. 6:

- 6) The College recommends that section 33 of the RHPA be amended so that registered professionals with an earned academic doctoral degree, including social workers, may use the title "doctor" in the course of providing health care, provided that the title and nature of the degree and the discipline in which the doctorate is held are clearly identified, and that the title is used together with the restricted professional title.**

CONCLUSION

The College is committed to the regulation of the professions of social work and social service work in the public interest. The College supports the important initiatives that the government has undertaken under Bill 171 to improve public protection through the regulation of new professions. The College believes that amendments to Bill 171 are needed, however, to ensure continued access for the people of Ontario to the important services that social workers provide in connection with psychotherapy. The College appreciates the responsiveness of the Minister of Health and Long-Term Care in acknowledging that Bill 171 needs to be amended in order to recognize the important role of social workers in the delivery of psychotherapy services. The College also appreciates the willingness of the government to consult on the amendments to

accomplish this objective. The College hopes that the Standing Committee will take this opportunity to amend Bill 171 so that this objective is accomplished.

Thank you for the opportunity to make this submission to the Standing Committee and for your consideration of the College's concerns and recommendations.

SCHEDULE A

SUMMARY OF RECOMMENDATIONS OF THE ONTARIO COLLEGE OF SOCIAL WORKERS AND SOCIAL SERVICE WORKERS

No.	Recommendation	Page No.
1.	That Schedule Q be amended to provide positive authorization for social workers to perform the controlled act related to psychotherapy.	15
2.	That Schedule Q be amended to permit social workers to use the restricted title "psychotherapist", provided this title is used in conjunction with the restricted titles "social worker" or "registered social worker".	15
3.	That Schedule Q be amended to exempt social workers from the holding out provision in the <i>Psychotherapy Act, 2006</i> , provided they comply with the SWSSW Act, its regulations and by-laws, so that a social worker would be able to represent that he or she is qualified to practise as a psychotherapist in Ontario.	15
4.	That Schedule Q be amended so that the regulated health professionals who are authorized to perform the controlled act related to psychotherapy can use the restricted title "psychotherapist" and are exempt from the holding out provision in the <i>Psychotherapy Act, 2006</i> .	15
5.	That Schedule Q be amended to require the Council of the College of Psychotherapists of Ontario to engage in a consultation process with other Colleges whose members provide psychotherapy services before a regulation is made under section 11 of the <i>Psychotherapy Act, 2006</i> .	17
6.	That section 33 of the RHPA be amended so that registered professionals with an earned academic doctoral degree, including social workers, may use the title "doctor" in the course of providing health care, provided that the title and nature of the degree and the discipline in which the doctorate is held are clearly identified, and that the title is used together with the restricted professional title.	18