

December 14, 2012

Ms. Suzanne McGurn, Assistant Deputy Minister
Health Human Resources Strategy Division
2nd Floor, Macdonald Block
900 Bay Street, Suite M2-61
Toronto, ON M7A 1R3

Dear Ms. McGurn,

CAPT appreciated the invitation to meet with you, Tim Blakley and Melissa Quan at the November 21 stakeholder meeting at the Ministry office.

In a recent letter to the Ministry of Health and Long-Term Care, the president of the transitional Council, Carol Cowan-Levine, responded to your letter from the Ministry regarding the draft Registration Regulation. In your letter you stated that the Regulation would be sent back to the transitional Council for revisions as it was concluded that the definition of Registered Mental Health Therapist would, if implemented as currently defined, be detrimental to the ongoing practice of many professionals whose practice touches on the scope of practice of psychotherapy, but for whom psychotherapy is not the predominant definition of what they do. In this sense, the Ministry does not want the practice of these professionals to be interrupted.

In her letter to the Ministry, Carol Cowan-Levine respectfully suggests that the Ministry might have come to this conclusion earlier in the process and not at this relatively late date. CAPT fully supports the transitional Council in this position and is concerned that a great deal of fine work will be wasted.

CAPT, among other stakeholders, originally felt that having the two titles (RP and RMHT) would be confusing to the public. In our submission to the transitional Council of February 2012, we stated that

CAPT is not convinced that there is a clear need for the college trained group of practitioners identified by consultant Liz Yorke to register with the

College as RMHTs. The area of overlap between an Addiction Counselor or a Child and Youth Worker, for example, and the Scope of Practice as defined in the Psychotherapy Act represents a very small portion of their work and training.

The above position is very similar to the position expressed by the Ministry in the letter to the transitional Council from Suzanne McGurn dated November 12, 2012. The Ministry is trying to avoid interrupting the services provided by already highly trained practitioners, a position we have endorsed and will continue to endorse. While on the one hand, CAPT agrees with the spirit of the Ministry's current view regarding the two titles, on the other we fully agree with Ms. Cowan Levine and the transitional Council's response to "the length of time it took the ministry to inform us of its position".

We are aware of the diligent work the transitional Council has done on our behalf and wish there was more we as stakeholders could do to assist them. To this end, over the past year, CAPT has been working to bring stakeholders together to discuss our diverse experience as psychotherapists. The result of this is that CAPT, the OAMFT and the Adler Graduate Professional School have been inviting our colleagues, the other stakeholders from across the entire psychotherapy profession, to approach the transitional Council about the possibility of forming an informal Advisory Group. This group, among other things, could be consulted by the transitional Council (and the Ministry) on the sometimes difficult process of bringing together disparate groups under one umbrella. In coming together as stakeholders with a common purpose, we have been reminded that what seemed like differences quickly became matters of interpretation: we are united in our profession, however differently we may practice.

The process of regulating such a diverse profession is an arduous one, and we applaud the Ministry and especially the transitional Council for the perseverance and vision they have shown over this time. We hope that if *all* the interested parties can continue to communicate with one another – from the Ministry through to the individual practitioner or client – this process can be effective and rewarding for all concerned.

Sincerely,

Susan Wood,
President, CAPT
On behalf of the CAPT board of directors
info@psychodynamiccanada.org