

## THE COLLEGE OF PSYCHOLOGISTS OF ONTARIO L'ORDRE DES PSYCHOLOGUES DE L'ONTARIO

#### **ENTRY-TO-PRACTICE REVIEW**

March 2011

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#### **Executive Summary**

The College of Psychologists gathered comparative data from other Canadian psychology regulators, other similar sized Ontario health profession regulators, and other stakeholders relevant to the questions posed for this Entry-to-Practice Review.

The findings in this review indicate that the College of Psychologists' practical training and work experience requirements are comparable to that of other psychology regulators and to national standards, and support the relevance and necessity of these requirements. College response timelines are reasonably comparable to those of other Ontario health care regulators of this size, and to other psychology regulators. In general, the College of Psychologists' fees fall within the same range as other Canadian psychology regulators and similar sized Ontario health care regulators.

Recommendations focus principally upon increased effectiveness of communication about, and monitoring of, response timelines, supported by an enhanced new database. The College of Psychologists' fees currently are within the range of other regulators' fees. Any potential increase will continue to strike a balance between reasonable cost to applicants and managing expenses.

#### **General Objectives and Scope**

This review was completed by the College of Psychologists in response to a direction from the Office of the Fairness Commissioner (OFC) in June 2010. It is, therefore, a mandatory Entry-to-Practice Review. As per the OFC communication, the limited scope of the review revolves around three specific areas:

- (a) an analysis of the necessity and relevance of the requirements for practical training and/or work experience, including any practicum, mentorship, internship or residency;
- (b) an analysis of the efficiency and timeliness of decision-making, including decisions related to assessment, registration and appeals;
- (c) an analysis of the reasonableness of the fees charged by the regulated profession in respect of registration, including fees charged by third-party assessment agencies.

Because the scope, methodology, and analysis for each of these specific areas varies, the report will be divided into sections (A), (B) and (C) accordingly.



#### Objectives and Scope: Section (A), Practical Training and Work Experience

The College of Psychologists has the following practical training requirements for members to achieve a Certificate Authorizing Autonomous Practice as one of the two regulated titles (Psychologist and Psychological Associate):

For Psychologists (doctoral level):

- practicum/internship training during the graduate program, as defined in the Guidelines for Academic Credentials, including supervised experience relevant for the controlled act of diagnosis (prior to beginning the registration process); and
- one year (1500 hours) of postdoctoral supervised practice (while holding a certificate for supervised practice and working in the field as a member of the College) as required in Section 5.(1) 1. ii. of Regulation 533/98, Registration.

For Psychological Associates (masters level):

- practicum/internship training during the graduate program, as defined in the Guidelines for Academic Credentials, including supervised experience relevant for the controlled act of diagnosis (completed prior to beginning the registration process);
- four or more years of work experience as required in Regulation 533/98,
   Registration in Section 5.(6)1. ii. and Section 5.(9)2 (prior to formal authorized supervised practice); and
- one year (1500 hours) of post-degree supervised practice (while holding a certificate for supervised practice and working in the field as a member of the College) as required in Section 5.(6) 1.iii. of Regulation 533/98, Registration.

Given the specific practical requirements for registration in this profession, the Objective and Scope for Section (a) was operationalized more specifically with respect to the relevant practical training required by the College of Psychologists. The review was, therefore, focused on the following practical training requirements: the practicum/internship training required as part of the academic program (both titles), the year of supervised practice (both titles), and the four years of work experience (for psychological associates only).

The governance and approval process for this Review were as follows. The Review Process laid out by the OFC was followed (Step 1. Project plan; Step 2. Collect and analyze data; Step 3. Make recommendations; Step 4 Write the Final Report).

The complete report was presented to the entire Registration Committee for approval in mid February 2011, then to the Executive Committee of the College (acting on behalf of the Council) in later February 2011, for their final approval.

#### Methodology: Section (A), Practical Training and Work Experience

For Section (A) regarding practical training, a Sub-committee was struck, which included the Director of Registration as well as three members of the Registration Committee of the College who are current or former directors of academic training programs and/or internship programs and thus, knowledgeable about practical training requirements as well as their necessity and relevance for entry-level practice. Two of the Sub-committee members are also members of the Council of the College. The Sub-committee gathered the data, analyzed the data and drafted Section (a) of this report.

The methodology for Section (A) regarding practical training involved several sources of information, which were identified as being useful to address the question. It was decided: 1. to gather all relevant information regarding these issues (an environmental scan) from documents and websites of relevance; and 2. to conduct a survey of relevant stakeholders regarding the requirements for practical training. Each of these is described further below.

**Professional Environmental Scan.** Information was gathered by the sub-committee regarding requirements for practical training in other jurisdictions and as articulated by other authoritative bodies, from websites and policy documents including:

- other Canadian Psychology Regulators in other provinces and territories
- the Canadian Council on Professional Psychology Programs (CCPPP)
- the Canadian Psychological Association (CPA) Accreditation Standards, used to accredit the graduate programs from which many applicants come
- the Association of State and Provincial Psychology Boards (ASPPB) which includes all Canadian as well as US jurisdictions
- two current Model Licensing Acts proposed by ASPPB and the American Psychological Association.

**Stakeholder Survey.** A brief survey was constructed by the Sub-committee which evaluated the *relevance* and *necessity* of the practical training requirements. The OFC

definitions of these two terms were provided. There were six statements in the survey that respondents were asked to read and indicate the extent to which they agreed (e.g., *The requirement for supervised practica and internship in the graduate program is necessary*). Responses were recorded on a 5-point Likert scale ranging from strongly disagree to strongly agree. See Appendix for a copy of the complete Survey.

The Survey was completed in October-November 2010. It was sent by email, with a confidential link, to approximately 50 to 60 knowledgeable stakeholders, including:

- the Directors of Clinical Training from all the professional psychology academic training programs in Ontario (18);
- Directors of Clinical Training from all the internship training programs in Ontario (25);
- the Executive of the Canadian Council on Professional Psychology Programs CCPPP (8);
- the CPA Accreditation Panel (exact number not provided).

A total of 31 responses were received, which indicates a response rate in the range of about 50-60% which is quite acceptable for a survey of this type.

**Audit of Applications.** The Sub-Committee conducted an audit of the applications that were referred to the Registration Committee, as reported in the Fair Registration Practices Report 2009.

#### Analysis and Findings: Section (A), Practical Training and Work Experience

**Results of Professional Environmental Scan.** The CPA Accreditation Standards (revised 2009, approved by CPA Council June 2010) is a 90-page document regarding academic and internship settings' accreditation process and requirements. CPA clearly requires all accredited programs to include Practicum and Internship training and indeed these are requirements for degree completion. The CPA Standards outline the purpose, nature, and amount of such practical training that is required (see pp. 25-28). The College's requirements are consistent with these Standards.

Regulatory bodies in other Canadian jurisdictions typically require practicum/internship training during the graduate degree program. Some may require additional post-degree supervised experience for licensure if there has been no practicum or internship training during the graduate degree program.

A minimum of a one-year period of post-degree supervised practice as part of the registration process is required in a majority of Canadian jurisdictions and a majority of

U.S. jurisdictions. Typically the requirement is for two years (3000 hours) of supervised practice, one (1500 hours) of which must be postdoctoral.

At the time of writing, three other Canadian jurisdictions have Psychological Associate registration at masters level; the requirement for post masters degree supervised experience ranges from two to four years. Five jurisdictions have masters level registration as a Psychologist. The requirement for post masters degree supervised experience ranges from one to four years.

Thus, in general, the practice of the College of Psychologist of Ontario is consistent with accepted standards in the majority of other jurisdictions.

There have been two psychology organizations which have recently developed model legislative acts for voluntary use by states or provinces for licensure of psychologists. One was developed by the American Psychological Association (APA; adopted Feb., 2010). It includes the requirement "The program must include supervised practicum, internship, field, or laboratory training appropriate to the individual's chosen area of practice of psychology." Further, it requires "the equivalent of two full-time years of sequential, organized, supervised, professional experience prior to obtaining the license. This training may be completed prior to or subsequent to the granting of the doctoral degree." The Association of State and Provincial Psychology Boards (ASPPB) Model Act for Licensure and Registration of Psychologists (approved Oct. 2010) has many similarities and some differences from the APA version. It requires "two years of supervised professional experience, one year of which may be an internship program, and one year of which shall be postdoctoral." The College of Psychologists' requirement for the predoctoral internship and the postdoctoral year of supervised practice is consistent with either of these model acts and is particularly congruent with the ASPPB version.

Results of Stakeholder Survey. As shown in Figure 1, there was general agreement from the knowledgeable stakeholders surveyed about the necessity and relevance of all three areas of practical training included in the Survey. Every single respondent (100%) was in strong agreement about the necessity of practicum/internship training during the graduate program and 97% strongly agreed that such training was relevant. Regarding Supervised Practice, 90% agreed or strongly agreed that it is necessary and 94% agreed or strongly agreed it is relevant. For the Psychological Associates' requirement for four years of work experience, 87% agreed or strongly agreed that it was necessary and 94% agreed or strongly agreed it was relevant.

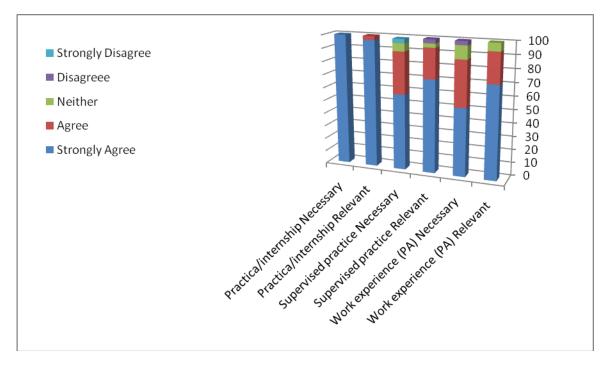


Figure 1. Responses to Survey Questions (% of responses)

**Results of Audit of Applications.** Of the 20 applications referred to the Registration Committee in the calendar year 2009, as reported in the Fair Registration Practices Report, 12 were from applicants whose highest degree was obtained in an Ontario university, 1 was obtained in another Canadian province, 3 were obtained in the U.S., and 4 were internationally educated. None of these applications was refused on the basis of graduate practicum/internship training, or supervised practice in the registration process, or work experience prior to supervised practice.

#### Recommendations: Section (A), Practical Training and Work Experience

Given the high degree of agreement among stakeholders that the identified practical training and work experience is both relevant and necessary, the consistency of the requirement for practical training and work experience in other jurisdictions in Canada and the U.S., and the fact that practical training and work experience requirements do not present a barrier to applicants qualifying to become registered for the practice of psychology in Ontario, it is recommended that the present requirements are appropriate and should remain.



#### Implementation Plan: Section (A), Practical Training and Work Experience

Continue regular consultation and liaison with directors of graduate psychology training programs, directors of clinical internship training, psychology accreditation bodies and psychology regulators to identify developments and trends.

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#### Objectives and Scope: Section (B), Efficiency and Timeliness of Decision-making

There are several decision-making points within the College's registration process. This review will focus upon the decision-making timelines, as published in Appendix B of the Registration Guidelines which are:

- 1. the time from which an application is complete with all supporting documents until an initial review is carried out by registration staff
- 2. the time from which an initial review is completed until a written response and supporting documents are sent to the applicant
- where an application has been referred to the Registration Committee for the review of academic credentials, the time from which the Committee renders a decision until a written response is sent to the applicant.

#### Methodology: Section (B), Efficiency and Timeliness of Decision-making

The methodology for Section (b) of the review consists of:

- staff review of the database, correspondence and Minutes for comparison with the timelines identified in the Registration Guidelines
- a comparison of this College's timelines to several Ontario health care regulators' timelines, as reported in the 2009 Fair Registration Practices Report
- a comparison of this College's timelines to several Canadian regulators' timelines, as determined by web site information and individual correspondence.



#### Analysis and Findings: Section (B), Efficiency and Timeliness of Decisionmaking

Results of staff review of the database, correspondence and Minutes. The identified timelines for the time from which an application is complete with all supporting documents until an initial review is carried out by registration staff is identified in the Registration Guidelines as being 4 to 6 weeks. An audit of a 3-month period from September 15, 2010 to December 15, 2010, using both database information and dates on correspondence, revealed that 100% of initial reviews had been completed within the prescribed amount of time. Response times tended to be at the higher end of the allowable time frame.

To enable this part of the review to take place, several additional fields had to be added by staff to an existing database. Although work was in progress with a contractor to construct a registration module in a new comprehensive database, requests from the Ministry for additional data to support the allied health human resource database resulted in a delay in the work on the registration module.

The next identified timeline, which is the time from which the initial staff review takes place until a written response and supporting documents are sent to the applicant, is 1 to 2 weeks. An audit of the same 3-month period showed that 100% of responses were sent within this amount of time, but again the response time tended to be at the higher end.

To determine how long it was taking from the time of a Registration Committee meeting until a written decision was issued, a case by case review of the Minutes from the meeting, as well as comparison with the dates on correspondence was undertaken. The fields to track this information are not present on the existing database but, to enable more effective retrieval of this information, are planned for the registration module of the new database. The Registration Guidelines stipulate that the written decision will be sent within 4 to 6 weeks of the date of the Registration Committee meeting.

As specified in the 2010 Fair Registration Practices Report, 23 applications were referred to the Registration Committee for the review of academic credentials (internal review) in that calendar year. Of these 23 applications, 11 or nearly half, were reviewed at the January, 2010 meetings of the Committee. This influx of referrals to the Committee was not anticipated, and is not apparently related either to mobility applications or to any change in Registration Guidelines. Even so, 5 of the written decisions were sent out within the published time frame, whereas 6 were not. All decisions from these meetings were sent within 10 weeks of the meeting date. It could also be noted that this influx of referrals resulted in the need to produce these decision letters while at the same time generating the 2009 Fair Registration Practices Report

which was due to be filed with the OFC by March 1, 2010, i.e. 6 weeks after the Committee's meeting dates.

In the rest of 2010, referrals to the Registration Committee for the review of academic credentials were much more evenly distributed, with the remaining 12 applications considered in March through November. In these instances, 10 written responses were completed within the recommended time frame, and 2 written responses went beyond the 6 week (42 day) point – one at 47 days and the other at 51 days.

## Results of comparison of College's timelines to published timelines of other Ontario health care regulators.

Profession	Psychology	Audiology & Speech Language Pathology	Dietetics
Completed application until initial staff review	4 to 6 weeks	3 weeks	No comparable process described
Initial review until written response to applicant	1 to 2 weeks	3 weeks	3 to 5 business days
Registration Committee meeting date until written decision and reasons	4 to 6 weeks	3 weeks	5 business days

Ontario health care regulators all must conduct their procedures within the framework of the RHPA, as well as the profession-specific acts and regulations. Even so, there can be considerable variation in the registration processes the various professions require. In professions in which there is a standard curriculum of training, a prescribed national entry to practice credential, and/or examination at the national level rather than the provincial level, there can be a more stream-lined application process. These variations are evident in the comparisons above. Applicants to this College present a minimum of one undergraduate degree and one, or two, graduate degrees. The academic credentials are not vetted at a national or central agency therefore the review is a College responsibility. The result is a longer period of processing time for this College in comparison to others.

At the Registration Committee level, the review is of greater complexity with the resultant longer response time. As well, the Health Professions Appeal and Review Board has given feedback through its decisions about review and signing procedures

that it expects the Registration Committee to have undertaken, all of which contribute to the amount of time needed to prepare correspondence with decisions and reasons.

Results of comparison of College's timelines to timelines of several Canadian psychology regulators. The College of Alberta Psychologists (CAP), according to the Health Professions Act of that province, has 120 days to provide a decision to the applicant. CAP has two separate committees – the Registration Approvals SubCommittee and the Credentials Evaluation SubCommittee – charged with the same sort of responsibilities as the Registration Committee of this College. The CAP SubCommittees meet at different intervals than the College's Registration Committee, and the CAP SubCommittee meetings dates are posted on their web site, a practice which this College also has adopted. Although correspondence from either of the CAP SubCommittees is mailed within 2 to 3 weeks, i.e. sooner than the 120 days their Act specifies, this College's response time for Committee correspondence (28 to 42 days) would also fall readily within that required response time.

The College of Psychologists of British Columbia (CPBC) publishes a Registration Requirements document which outlines various timelines within their registration process. Although this is a document comparable to the College's Registration Guidelines, the focus is not on the time within which an applicant may expect a response from CPBC. Articles in the CPBC's newsletter, the Chronicle, show that a number of their processes are under review in light of legislative changes. CPBC may develop some statements about response times which the College could use for comparison purposes in future, but for the time being, has none.

#### Recommendations: Section (B), Efficiency and Timeliness of Decision-making

- 1) Communicate timelines to applicants and their supervisors more clearly and frequently in more sections of the Registration Guidelines.
- Complete construction of the web-based registration module, providing applicants the means to check their own profile/records for completeness of application documents.
- 3) Modify the existing database to provide more checkpoint fields in support of the tracking process.
- 4) Hold regular registration staff meetings for the purpose of monitoring application review and response times.
- 5) Accumulate year over year data to identify peak periods for the receipt of applications.



6) Complete construction of the administrative section of the web-based registration module for efficient, accurate tracking of applications and response times throughout the registration process.

#### Implementation Plan: Section (B), Efficiency and Timeliness of Decision-making

- 1) Within one year, review the various sections of the Registration Guidelines to identify appropriate places to insert timeline information.
- 2) Funding for the applicants' section of the web-based registration module has been approved by Council. Completion of construction of this module is expected within 18 months.
- 3) Modification of the existing database can be done by registration staff within 6 months.
- 4) Keep an on-going record of registration staff meetings, including database reports of response times.
- 5) Charting and graphing of weekly numbers of new applications is now occurring. Two years worth of data will provide the basis for identifying fluctuations in application receipt.
- 6) Funding for the administrative section of the web-based registration module has also been approved by Council. Completion of construction of this module is expected within 18 months.
- 7) Create a Registration Sub-Committee to identify the means by which information can be gathered from newly registered members about their experience in the registration process.

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#### Objectives and Scope: Section (C), Reasonableness of the Fees

A variety of fees are charged by the College of Psychologists as the applicant moves through the registration process. In addition to reviewing the fees of the College, the review will also consider the fees of credential evaluation agencies (required by individuals educated outside Canada or the U.S.), and the fees required to write the one required examination that the College does not administer itself.

#### Methodology: Section (C), Reasonableness of the Fees

**Survey of a selection of Canadian psychology regulators.** Information was gathered from the web sites, policy documents, and through contact with the regulators' registration staff members, of Canadian psychology regulators with varying numbers of members, including Quebec, Alberta, British Columbia and Manitoba.

Survey of a selection of Ontario health regulators with comparable number of members. Information was gathered from the web sites, policy documents, and through contract with registration staff members, of Ontario health regulators with a comparable number of members, including the College of Physiotherapists, the College of Occupational Therapists, the College of Audiologists and Speech Language Pathologists.

Survey of third-party assessment agencies. Academic credential assessment agencies are used both by a number of Canadian psychology regulators and by Ontario health regulators. The credential assessment agencies selected for this comparison included: World Education Services (WES), Comparative Education Services of the University of Toronto (CES), and International Credential Evaluation Service of the British Columbia Institute of Technology. (WES and CES do all of the credential assessments for applicants to the College of Psychologists.) Information was gathered from the web sites and policy documents of all three organizations.

In addition, psychology regulators in both Canada and the U.S. use the Examination for Professional Practice in Psychology (EPPP) as one of the required examinations. The EPPP is developed and maintained by the Association of State and Provincial Psychology Boards (ASPPB), and administered through a network of computer testing

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centres (Prometric) in Canada and the U.S. As such, ASPPB is considered to be a third-party assessment agency.

# Analysis and Findings: Section (C), Reasonableness of the Fees Results of the survey of a selection of Canadian psychology regulators.

Jurisdiction	Quebec	Ontario	Alberta	British Columbia	Manitoba
Number of members	8470	3348	2862	1160	255
Annual fee (regular)	\$530	\$795	\$600	\$1200	\$985
Supervised practice fee, if applicable	n/a	<b>\$397.50</b> semi-annual	\$300	\$350	n/a
Application fee	n/a	\$100 - \$230	\$130 - \$280	\$500-\$775	\$300
Jurisprudence Examination fee, if applicable	\$250	\$270	n/a	\$150	\$100
Oral Examination fee, if applicable	n/a	\$740	\$400	\$600	\$300

As may be seen from the table above, the jurisdiction with the largest number of members (i.e. Quebec) is able to achieve an economy of scale which is reflected in it having the lowest annual membership fee. The jurisdictions with the smaller number of

members have the higher annual fees. The College's annual fee falls midway in this range of fees and there has been no increase in this fee since 2002.

The fees for supervised practice, in the jurisdictions where this applies, show little correlation with the number of members in the jurisdiction. In the College's case, there has been no increase in the fee for supervised practice members since 2002. The College's fee for supervised practice members is the same as the annual fee for autonomous practice members, however, supervised practice members are billed a prorated fee at six month intervals.

In the jurisdictions where there is an application fee, there appears to be little variation except in the case of British Columbia, where the application fee includes one written jurisprudence examination. There has been no increase in the College's application fee since 1991.

For the Jurisprudence Examination, there is a range of fees from \$100 to \$270, with the College's fee being at the top of this range. However, the College's Jurisprudence and Ethics Examination is a multiple choice examination based upon a practice analysis – a procedure which some other jurisdictions may not use in creating their examinations. Although the College has devoted its resources to constructing the examination in this manner, it made an explicit decision that the fee for this examination is not determined on a cost-recovery basis. The cost of creating and maintaining this examination exceeds the amount charged to candidates taking this examination, and this fee has not been increased since 2004.

A range of fees from \$330 to \$740 exists among the jurisdictions using an Oral Examination. The College's Oral Examination fee is \$740, an amount which has not increased since 2003. Here again Council made an explicit decision that the fee for this examination is not to be determined on a cost-recovery basis. Expenses continue to exceed income for each administration of this examination.



## Results of the survey of a selection of Ontario health regulators with comparable number of members.

Profession	Physiotherapy	Occupational Therapy	Psychology	Audiology & Speech Language Pathology	Dietetics
Number of members	7141	4563	3348	3291	3000
Annual fee	\$635	\$843	\$795	\$250/\$175	\$500
Supervised Practice, where applicable	n/a	n/a	<b>\$397.50</b> semi- annual	n/a	\$100
Application fee	\$100	\$226	\$230	\$75/\$100	\$100 -\$350

Although the registration process various substantially among Ontario's health care regulators, a sample of some of the professions with a roughly comparable number of members nevertheless reveals that the College's annual fee is within the range charged by these regulators. Some regulators, in professions where there is a standard curriculum of training, a prescribed national entry to practice credential, and/or examination at the national level rather than the provincial level, can have a more stream-lined application process, however this is not the case for the profession of psychology. Despite this, the College's application fee also remains in the range charged by other regulators.



## Results of the survey of third-party assessment agencies: credential assessment agencies.

Name of Assessment Agency	Fee
Comparative Education Service (CES) of the University of Toronto	\$226 or \$508(rush)
BCIT International Credential Evaluation Service	\$125 per credential/basic service \$225 per credential comprehensive service
World Education Services (WES)	\$115 basic service or \$210 for course by course evaluation

According to the OFC Study of Qualification Assessment Agencies, 2009, CES and WES are credential evaluation agencies used by a number of Ontario regulators. The College relies on evaluations from each of these organizations to determine the academic level of degrees. The OFC Study found that "credentials assessment agencies offer the most uniform fees" and that "profession-related assessment agencies that do credentials assessment themselves charge higher fees". There is no overlapping process for the College does not charge any separate or additional fee for the review of credentials. This is covered by the application fee itself.

For comparison, BCIT International Credential Evaluation Services, which is used by the College of Psychologists of British Columbia, was included in this table. The fee charged by BCIT International Credentials Evaluation Services is very consistent with that charged by CES and WES.

The remaining part of the survey of third-party assessment agencies involves the fees payable to ASPPB from candidates who take the Examination for Professional Practice in Psychology (EPPP). The fee to take the EPPP is \$ 450 U.S., regardless of which jurisdiction the candidate is in, plus a fee of \$67.50 U.S. charged by Prometric for the computer based administration, regardless of which testing centre in Canada or the U.S. is selected.



#### Recommendations: Section (C), Reasonableness of the Fees

The fees charged by the College are consistent with those charged by other Canadian psychology regulators and by other similar-sized health regulators in Ontario. The College's Finance and Audit Committee is advising the Council that in the current fiscal year, the College's budget will move into a deficit position. Nevertheless, the Council has decided that there will be no fee increase in the 2011 – 2012 fiscal year. Thereafter, the College will continue to monitor financial projections in order to determine whether an increase may be necessary for 2012 -2013. However, any fee increase is likely to remain within the range of that charged by other health care or psychology regulators.

#### Implementation Plan: Section (C), Reasonableness of the Fees

Each year, the Finance and Audit Committee reviews the various fees charged by the College in light of the College's budget and operating expenses and may include a comparison of fees charged by other Canadian psychology regulators and other similar-sized health regulators in Ontario.

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#### **Statements of Approval**

I certify that the information contained in this report is that which was requested by the Fairness Commissioner and that it is accurate.

Connie Gearn

February 24, 2011

Connie Learn
Director of Registration and Administration
College of Psychologists of Ontario

Date

I certify that the Registration Committee has approved this report.

Can Ma	February 22, 2011
Tim Hill, M.A., C.Psych.Assoc. Chair, Registration Committee	Date

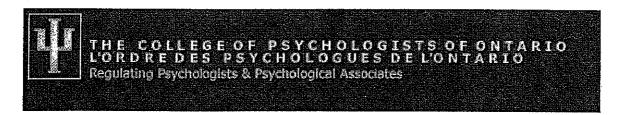
I certify that the Executive Committee, on behalf of the Council of the College, has approved this report.

February 24, 2011

Ivan McFarlane, Ph.D., Public Member

Date

#### **APPENDIX**



#### **Entry to Practice Review**

The College of Psychologists of Ontario is required by the Office of the Fairness Commissioner of Ontario (OFC) to carry out a review of the necessity and relevance of its requirements for practical training and work experience as conditions for entry to practice.

The OFC provides the following definitions:

"Necessary means essential, needed, or vitally important. A registration requirement is necessary when, without it, a regulatory body could not be satisfied that an applicant can practise the profession competently and safely at an entry level. Special requirements for internationally trained applicants are necessary when they are clearly justifiable."

"Relevant means logically connected to the issue at hand. A registration requirement is relevant when it helps to make a well-founded assessment or registration decision or to verify an important fact. For example a required qualification is relevant when there is a logical connection between the qualification and a person's competence to practise the profession at an entry level."

Part of this review involves consultation with stakeholders. Please indicate your level of agreement with the following statements regarding the necessity for, and relevance of, the requirements for registration that relate to practicum and internship, work experience and supervised practice.

The College of Psychologists of Ontario requires psychologists and psychological associates to have training in the graduate program through supervised practica and internship appropriate to the practice of psychology and supervised by individuals who are registered or licensed to practise the profession of psychology.

The requirement for supervised practica and internship in the graduate program is

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