



CPA Task Force on Title: Model Language Suggestions

Canadian Psychological Association

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Task Force Terms of Reference

In 2016, Dr. Votta-Bleeker and Dr. Cohen provided a succinct yet comprehensive introduction to the issue of access to title in psychology, preliminary options that may address the issue, and a call for volunteers for the current task force (Votta-Bleeker & Cohen, 2016). The Title Task Force was initially created in 2016 with a call placed to the CPA membership to join the task Group. The task force was re-convened by the CPA's Board of Directors in 2018. The mandate of the Title Task Force was to explore the issue of title within the profession of psychology, including to:

- review the current Canadian landscape for individuals holding graduate degrees in psychology;
- collaborate with a liaison from the Association of Canadian Psychology Regulatory Organizations (ACPRO) to explore possibilities related to title exemptions
- make recommendations that could allow for those with graduate degrees in psychology to identify with their discipline and profession while respecting the public protection principle that underlies the regulated practice of psychology (e.g., help the public identify regulated health care providers).

Background

Graduates of doctoral programs in psychology are not necessarily able to use the term psychologist to identify their profession. The term “psychologist” has become the domain of those who practice psychology as health care providers. The regulatory bodies in Canada vary with respect to the terms they protect (e.g., psychology, psychological). All protect the title psychologist. In some jurisdictions, psychology acts provide exemptions – the most typical is for university professors of psychology to use the term psychologist (Appendix A). However, the wording in some jurisdictions results in a lack of clarity with respect to whether such an individual would need a doctoral degree in psychology or in fact a degree in psychology at all to use the title psychologist if that individual held an academic appointment in psychology in a university. Further, as described in Votta-Bleeker and Cohen (2016), in some provincial acts, it appears that it may not be possible for individuals who hold a doctorate degree in psychology to even convey this information when describing their education! For example, in New Brunswick, the psychology act indicates that no person shall “use verbally or otherwise the words “psychological”, “psychologist” or “psychology” in any title or any name, description or designation thereof which may lead to the belief that he is licensed under this Act”

(<https://www.gnb.ca/legis/bill/FILE/58/3/Bill-65-e.htm>).

Although it is important to help the public identify regulated providers of health care services, it is equally important to recognize that the discipline and profession of psychology is far broader than health service provision and that title limitations intended to protect the public can have unfair consequences. Those who have earned doctoral degrees in psychology should be able to identify with their particular field of expertise and represent themselves accordingly. This is important for individuals with advanced degrees in psychology, the profession, the discipline, as well as members of the public. For example, a client outside of the health service domain may benefit from being informed that a service provider has an earned doctorate in psychology that is relevant to their needs (e.g., program

evaluation, policy development, attitude surveys). Otherwise, that client might not have sufficient information to differentiate a doctoral-level provider in a relevant domain from a lesser-trained provider. The ability to inform others through the use of title needs to extend past the walls of a university. The exemption for the use of the title psychologist being tied to an academic appointment does a disservice to those who have obtained a doctorate in psychology and who work in other sectors (e.g., private industry, government, non-government organizations). Their training and expertise in psychology is as much the foundation of their work as is the case for the university professor or practicing clinician. Ultimately, the profession and discipline of psychology is harmed when individuals educated in psychology cannot identify themselves and their work as psychological in nature.

Recommendations

The Title Task Force considered the access-to-title issue and options to address it. After deliberation, **the Task Force respectfully recommends that the CPA advocate for consistency in the legislated exemptions across the provinces and territories of Canada.** This would involve advocating for consistency in the use of title and in the exemptions adopted in the jurisdictions across Canada. Drawing on a range of sources, we have compiled the following recommendations and model language (in italics). We note here that provincial and territorial regulatory bodies of psychology may regulate other titles (e.g., Psychological Associate), but these are currently beyond the scope of this task force.

The Title Task Force’s primary recommendations involve granting specific and consistent exemptions pertaining to the use of the title “psychologist” across Canada (outlined below). To enable those exemptions to work effectively, clarity and consistency in the use of the protected title across Canada is also recommended. Further, we recommend that the CPA partner with other stakeholders to educate members of the public about the profession of psychology, its titles, and designations.

The CPA’s Board of Directors has approved the position “that the doctoral degree should be the entry to practice degree for registered psychologists in Canada” (CPA, 2011, p. 5). Nothing in the present submission is intended to contradict or modify the CPA’s position in that regard. However, the Title Task Force also recognizes that some provinces register both doctoral and master’s “psychologists” which must be taken into account when developing exemptions. Consequently, the Title Task Force recommends that jurisdictions consider protecting specific titles for registered psychologists, including a title unique to registered doctoral-level psychologists in addition to specific and consistently used exemptions. Recommended protected titles are:

1. Registered Doctoral Psychologist [R.D.Psych.]

A psychologist registered with the body that regulates the practice of psychology in their jurisdiction of work, and who has an earned doctorate (e.g., Ed.D., Ph.D./Ph.D, R/I, or Psy.D./D.Psych.) in psychology. The practice of health and behavioural health psychology includes, but is not limited to, the delivery of direct and indirect preventive, diagnostic, assessment, and therapeutic intervention services to clients whose growth, adjustment, or functioning is actually impaired or is demonstrably at risk of impairment or the supervision of any of the above. Registration confirms that the psychologist has the training and experience, as defined by the regulatory body, necessary to provide the foregoing health and behavioural

health services to the public. A Registered Doctoral Psychologist may choose to use the title “psychologist.”

2. Registered Psychologist [R.Psych.]

A psychologist registered with the body that regulates the practice of health and behavioural health psychology in their jurisdiction of work, and who has an earned master’s degree in psychology. The practice of health and behavioural health psychology includes , but is not limited to, the delivery of direct and indirect preventive, diagnostic, assessment, and therapeutic intervention services to clients whose growth, adjustment, or functioning is actually impaired or is demonstrably at risk of impairment or the supervision of any of the above. Registration confirms that the psychologist has the training and experience, as defined by the regulatory body, necessary to provide the foregoing health and behavioural health services to the public. A Registered Psychologist may choose to use the title “psychologist.”

3. Protected Titles

Only psychologists registered with a provincial or territorial regulatory body of psychology may use the title and abbreviation of Registered Doctoral Psychologist (R.D.Psych.) or Registered Psychologist (R.Psych.). No person, other than a registered psychologist or a person specifically exempted under this act, shall use the reserved titles or otherwise self-represent as a psychologist using any title, name, description, abbreviation, derivative, or set of initials, in any language, that may create the impression that the person is a registered psychologist authorized to practice psychology in this jurisdiction.

Irrespective of whether or not inter-jurisdictional consistency in title can be achieved, the following exemption plan depends on each jurisdiction using some designation or modifier to the psychologist title for their regulated psychologists (i.e., R.Psych., C.Psych. L.Psych., OPQ) that will distinguish those health service providers in psychology from others who, as we propose below, be granted access to title via exemption.

Model Exemption Language

4. Psychologist

A person with an earned doctorate (e.g., Ed.D., Ph.D.) from a degree-granting university, professional school, or other institution of higher education may use the title psychologist provided that the person:

- 1) *Has an earned doctorate in psychology that has been awarded by a degree-granting institution that meets the institutional recognition criteria that are used by Canadian Psychology regulatory bodies or, if an American institution, by one of the regional accreditation bodies recognized by the Department of Education in the USA. If the degree is granted by an institution from outside of Canada or the USA, it must be evaluated by a recognized credentialing organization as equivalent to a doctoral degree in psychology that a person could earn in a recognized institution in Canada.*
- 2) *Does not provide diagnostic, assessment, or therapeutic intervention services with individuals, couples, families, and groups whose growth, adjustment, or functioning is actually impaired or is*

demonstrably at risk of impairment unless he or she also is a member of a regulatory body in their jurisdiction of work and holds the necessary title permitting them to perform the foregoing activities.

- 3) *Does not use the titles or abbreviations Registered Doctoral Psychologist (R.D.Psych.), Registered Psychologist (R.Psych.), or any other which conveys an authorization to provide a health and/or behavioural health service (e.g., licensed psychologist, chartered psychologist, certified psychologist, C.Psych.) unless the individual is registered with the body that regulates the practice of health and behavioural health psychology in their jurisdiction of work.*
- 4) *Does not self-represent via title, description, or otherwise as being authorized to provide services to individuals in the health and behavioural health fields unless the individual is registered with the body that regulates the practice of health and behavioural health psychology in their jurisdiction of work.*
- 5) *Uses title(s) and descriptions of role, field of service or research, or area of competence that are distinct from those used in health and behavioural health fields. This will normally include using an appropriate modifier to the psychologist title such as academic psychologist, experimental psychologist, research psychologist, professor of psychology, environmental psychologist, industrial-organizational psychologist, or the like. A modifier that is likely to be confused with a title used by a registered psychologist working in health or behavioural health fields shall not be used (e.g., clinical psychologist) unless the individual is registered with the body that regulates the practice of health and behavioural health psychology in their jurisdiction of work.*

Conclusions

The CPA Title Task Force believes that the eventual adoption of exemption language similar to that proposed herein will allow those who have earned doctorates in psychology to access the title of psychologist in a responsible way. Clarity and consistency in use of protected title(s) for those providing health services in psychology should facilitate the regulatory mandate to protect the public. We recognize that exemptions are typically captured in provincial/territorial legislation and that changing them is beyond the purview of regulators. **The Title Task Force recommends that the CPA collaborate with its provincial and territorial psychology association partners to advocate for the adoption of this exemption model across the country. The CPA should also engage with various stakeholders on coordinated efforts to educate the public about psychology and psychologists in concert with standardized protected titles and statutory exemptions recommended herein.**

References

Canadian Psychological Association (2011). Canadian Psychological Association (CPA) position on the entry to practice for professional psychology in Canada. Retrieved from <https://cpa.ca/docs/File/Practice/EntryPracticeProfPsychologyCanada2012.pdf>

Votta-Bleeker, L., & Cohen, K. R. (2016). A psychologist by any other name... or not. *Psynopsis, Summer*, 38-40.

Appendix A

(From Cohen & Votta-Bleeker, 2016)

<p>Alberta R.Psych.</p>	<p>Titles 15(1) A regulated member who is registered on the following registers may use the following titles:</p> <ul style="list-style-type: none"> a. a regulated member registered on the general or courtesy register is authorized to use the title, psychologist or registered psychologist; b. a regulated member whose name is entered on the provisional register is authorized to use the title provisional psychologist or registered provisional psychologist. <p>(2) Regulated members may, in accordance with section 5 of Schedule 22 to the Act, use the titles and abbreviations set out in that section.</p>
<p>British Columbia R.Psych.</p>	<p>Reserved Titles 3 (1) The following titles are reserved for exclusive use by registrants:</p> <ul style="list-style-type: none"> a. registered psychological associate; b. psychological associate; c. registered psychologist; d. psychologist. <p>(2) Despite subsection (1), a person who is not a registrant may use the title "psychologist", and a society whose members are not registrants may incorporate the words "psychology", "psychological" or "psychologist" in their title or designation, if that person is, or the members of that society are,</p> <ul style="list-style-type: none"> a. practising the profession in the course of the person's employment with a board or council under the Health Authorities Act or with a community health services society, designated by the minister for the purposes of this paragraph, incorporated under the Society Act, b. teaching, lecturing or engaging in research as a psychologist if those activities are carried out by reason of, and in the course of, duties under an academic appointment or program in a university as defined by the University Act, or c. acting in the course of employment by: (i) a provincial, federal or municipal government or government agency; (ii) an authority as defined in the Independent School Act; (iii) a francophone education authority as defined in the School Act; or (iv) a board of school trustees constituted under the School Act, if qualifications in psychology are a condition of such employment.
<p>Manitoba C.Psych.</p>	<p>Any person not registered under this Act who assumes the title of psychologist, or in any manner represents that he is a psychologist, or uses a title, or description of services, containing the word "psychological", "psychologist" or "psychology" or any derivative thereof or in any way holds himself out to the public as such for hire, gain, or hope of reward, or by false or fraudulent declaration attempts to procure registration under this Act, is guilty of an offence.</p>
<p>New Brunswick L.Psych.</p>	<p>10(1) No person shall</p> <ul style="list-style-type: none"> a. hold himself out or conduct himself in such manner as might lead to the belief that he is engaged in the practice of psychology as a psychologist or is a licenced

	<p>psychologist under this Act,</p> <p>b. use verbally or otherwise the words "psychological" "psychologist" or "psychology" in any title or any name, description or designation thereof which may lead to the belief that he is licenced under this Act, unless such person is licenced under this Act.</p> <p>10(2) The holding of a valid licence under this Act authorizes a member to engage in the practice of psychology, subject however to limitations contained in the said licence.</p> <p>10(3) Nothing in this Act</p> <p>a. applies to or prevents anyone from engaging in the practice of any other profession, or;</p> <p>b. applies to restrict the members of the faculty of a psychology department of an accredited university in the Province from carrying on their usual functions.</p>
<p>Newfoundland and Labrador R.Psych.</p>	<p>1) A registered psychologist may use the designation "psychologist".</p> <p>2) A person other than a registered psychologist who holds himself or herself out to the public by a title or description of services as a psychologist or as a person who practices psychology is guilty of an offence.</p> <p>3) Subsection (2) does not apply to students of psychology, interns of psychology or professors of psychology while carrying out their teaching and research duties, so long as they use a title or description of services that clearly indicates their student, intern, or professor status.</p>
<p>Nova Scotia R.Psych.</p>	<p>21. The word “psychologists” or “psychologist (candidate)” or any like words or expressions implying a person recognized by law as a psychologist in the Province, when used in any regulation, rule, order or by-law made pursuant to an Act of the Legislature enacted or made before or after the coming into force of this Act, or when used in any public document, means a person registered in the Register of Psychologists or the Register of Candidates.</p> <p style="text-align: center;">Prohibitions</p> <p>Practice by person other than registered psychologist</p> <p>22 (1) A person who is not a registered psychologist and who is not registered on the Register of Candidates and who</p> <p>a. holds himself or herself out to the public by any title or description of services containing the word “psychology”, “psychologist” or “psychological” or any abbreviation or derivative;</p> <p>b. publicly or privately, for hire, gain or hope of reward, practises or offers to practise psychology; or</p> <p>c. holds himself or herself out in any way to be entitled to practise psychology, is guilty of an offence.</p> <p>22 (2) Subsection (1) does not apply to</p> <p>a. psychology students, interns and technicians provided that they use a title or description of services such as “psychology student”, “psychology intern”, “psychology technician” or other title or description of services which clearly indicates their student, intern or technician status; or</p> <p>b. professors of psychology while carrying out their teaching and research duties,</p>

	so long as they use a title or description of services that clearly indicates their professor of psychology status.
Ontario C.Psych.	<ol style="list-style-type: none"> 1) No person other than a member shall use the title “psychologist” or “psychological associate”, a variation or abbreviation or an equivalent in another language. 2) No person other than a member shall hold himself or herself out as a person who is qualified to practise in Ontario as a psychologist or psychological associate or in a specialty of psychology. 3) A person who is not a member contravenes subsection (2) if he or she uses the word “psychology” or “psychological”, an abbreviation or an equivalent in another language in any title or designation or in any description of services offered or provided. 4) Subsections (1) and (3) do not apply to a person in the course of his or her employment by a university.
Prince Edward Island C.Psych.	<p>1 (m) “Psychologist” means an individual who is registered, or deemed to be registered, in the Register of Psychologists under Section 13.</p> <p style="text-align: center;">Offences</p> <p>57 (1) No person, other than a psychologist, shall use the designation “Psychologist” or “C. Psych”, or any other title, name, description, abbreviation or derivative implying that the person is a psychologist</p> <p>57 (7) This section does not apply to</p> <ol style="list-style-type: none"> a. a professor of psychology while carrying out teaching and research duties, who uses a title or description that clearly indicates his or her professor of psychology status; or b. a person <ol style="list-style-type: none"> i. who is authorized to practice psychology, or to use a title relating to the practice of psychology, by a professional regulatory body in another jurisdiction recognized by the Board, and ii. whose practice of psychology in the province consists only of the provision or educational workshops or courses and does not exceed one week in a calendar year.
Quebec, OPQ	<p>36. No person shall in any way whatsoever:</p> <p>(e) use the title “Psychologist” or any other title or abbreviation which may lead to the belief that he is a psychologist, or use initials which may lead to the belief that he is a psychologist, unless he holds a valid permit for that purpose and is entered on the roll of the Ordre professionnel des psychologues du Québec</p>
Saskatchewan R.D. Psych (Doctoral) R.Psych. (Masters)	<p>Protected title</p> <p>24 (1) Subject to subsection (3), no person other than a member shall use the title “psychologist” or any word, title or designation, abbreviated or otherwise, to imply that a person is a member.</p> <p>(2) No person other than a member who is registered and licensed pursuant to section 20 or 21 and who holds a doctoral degree may use the title “doctoral psychologist” or any word, title or designation, abbreviated or otherwise, to imply that the person is a member who is registered and who holds a doctoral degree.</p> <p>(3) A person who is not a member and who is employed as a psychologist at The</p>

	University of Regina, the University of Saskatchewan, Saskatchewan Indian Federated College or the Saskatchewan Polytechnic may use the title “psychologist” provided that that person is not providing or directing the provision of counselling, clinical psychology or psychological assessment.
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