

Position Statement: Use of Title

Introduction

The use of any title or designation is an effective method of quickly imparting considerable information about oneself to others. It immediately allows the audience to identify the common roles or activities and characteristics associated with that title. A title serves as a means of representing yourself to others. Titles may be attributed to an individual through a variety of mechanisms; some earned through training or education (e.g. professional credentials) and others as a result of a position held (e.g. a job title such as case manager). Some titles such as “Occupational Therapist” are also protected by legislation and their use is granted through a process of registration with an authorized body. While the process to secure a title may seem quite straightforward, there are several elements to consider in relation to the use of title. This position statement is intended to identify and clarify the issues related to title use for occupational therapists in Ontario.

Protected Title

One of the central elements of the *Regulated Health Professions Act (RHPA), 1991* and the *Occupational Therapy Act, 1991* is the protection of title. In Ontario, the title “Occupational Therapist” or “O.T.” or any variation or abbreviation of them, is reserved for individuals registered with the College of Occupational Therapists of Ontario. Title protection as part of the regulation of a profession is one mechanism used to help the public readily identify those individuals who are registered with the College and are subsequently accountable for the delivery of occupational therapy service that meets the established standards of the profession. It is in fact a privilege extended to those occupational therapists who have met the entry requirements to practice and maintain their accountability to a regulatory body for continued competence.

In April 2001, the College’s *Registration Regulation* was amended, including the section on use of title. Section 43 states: “a member who uses an abbreviation indicating that the member is registered or is recognised as an occupational therapist shall use the abbreviation ‘OT Reg. (Ont.)’ in English or ‘Erg. Aut. (Ont.)’ in French.”

The title change, and specifically the addition of the modifiers Reg. (Ont.), was made for a variety of reasons. There has been ongoing confusion about the appropriate title that distinguishes an OT who is registered with the College. Many therapists include a (C) after the OT, believing it denotes certification, rather than its intended meaning of Canada for members of CAOT. There are also some individuals who hold a degree in occupational therapy but are not currently registered with the College. The addition of the new modifier will clearly identify those registered with the College. The new title will also help to remove some of the confusion that exists as a result of a variety of degrees issued by the University programs, all representing the same qualifications to practice occupational therapy in Ontario (e.g. BSc.OT, BHSc.OT, MCHSc.OT, MSc.OT) but potentially unclear in meaning to the public. While individuals who have received any of these conferred degrees may rightfully indicate such, if they are not also registered with the College, they may not use the additional designation of “OT Reg. (Ont.)”.

Transparency

Appropriate representation is most likely to be achieved if the greater principle of transparency is applied. Therapists should always represent themselves, their knowledge, skills and abilities in a clear, open and thorough manner. In order to achieve transparency and avoid misleading or misrepresentative information it is essential to consider the general knowledge and expectation of the audience receiving the information.

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The principle purpose for protection of title is to prevent confusion or misrepresentation to the public. Based on that understanding, it is important to recognize that the use of a title or designation is only a small part of the broader issue of how one represents oneself to others. As such, within the *Occupational Therapy Act* there is also a provision that “no person other than a member shall hold himself or herself out as a person who is qualified to practice in Ontario as an occupational therapist”. This is known as “holding out” and would be determined not by use of title but through conduct that leaves the audience with the perception that one is qualified to practice as an occupational therapist.

Interpretations of Title Use

Titles for Associated OT Roles

While the College only regulates occupational therapists, there are some individuals in associated roles that are involved in providing occupational therapy services to the public. It is important that the public clearly recognize the relationship of these individuals with the occupational therapist.

Students

As stated in the *Practice Guideline: Supervision of Student Occupational Therapists*, a student occupational therapist, under the supervision of an occupational therapist, must only use the title Student Occupational Therapist or Student OT. This immediately identifies the student role to the public.

Assistants

Although the College does not have any jurisdiction over support personnel, there is concern about how occupational therapists assign their work in order to ensure that safe, high quality care is provided to their clients. In October 1998 the College endorsed the use of the title Occupational Therapist Assistant, when service has been assigned to an assistant who is supervised by an occupational therapist. This title relates the role as one of assisting and attaches accountability to a professional person (occupational therapist) rather than a program or profession (occupational therapy). This title is also consistent with the language of the Vocational Learning Outcomes of Occupational Therapist Assistants, as established by the Ontario Ministry of Education and Training, Colleges Branch.

College Applicants

Occasionally, the College receives applications from individuals who need to complete a clinical review program in order to fully meet the registration requirements for a certificate to practice. Most often this situation applies to individuals who are not current (e.g. have been away from practice for an extended period of time) and are re-entering the profession. These individuals are not eligible to use the OT title until they have successfully completed the review program. The College recommends the use of the title “OT Reg. (Ont.) Candidate” in these situations.

Specialty Designations

Keeping in mind that titles are a part of representation and intended to provide clarity to the audience, speciality designations require careful consideration because they suggest specialization. Detailed in regulation by this College, it is considered professional misconduct to use a term, title or designation indicating or implying specialization in the profession. This position is further reinforced in the *Advertising Regulation*, paragraph 23 (2): “A member shall not use the title or designation in an advertisement if it indicates or implies specialization or otherwise suggests that he or she is a specialist.” Occupational therapy as a profession in Ontario does not currently have formal specialty areas. The

College provides registration certificates for general practice, reflective of the common knowledge and skills of occupational therapy. Specialty certifications on the other hand carry with them an assumption that they are defined by unique, evidence-based knowledge and skill with specific, defined standards. It is also commonly held that speciality designations have been secured through an appropriately rigorous credentialing process, something the profession does not currently do. While there are clearly distinct areas of practice such as psychiatry, health promotion, physical medicine, neurology etc. in occupational therapy, a process to establish specialty certifications does not exist.

The concern for therapists is that of determining how to portray expertise within an area of practice without implying specialization within the profession. The public may misinterpret titles such as Sensory Integration Therapist, Infant Therapist or Registered Rehabilitation Practitioner as specialized fields of knowledge with established professional standards of practice and licensing regulations. Such designations, courses, or fields of study enrich the basic and mandatory prerequisite education of occupational therapists, however they are not currently recognized areas of specialty practice. The College has held the position that it is not appropriate to include credentials, or initials for such, after one's name that would suggest specialization. It is suitable however, to make a statement about an area of special interest or additional training. For example, rather than stating "Certified Hand Therapist" or CHT, it would be appropriate to state "OT with training and expertise in hand therapy".

The College recently reviewed this position in light of concerns expressed by some registrants that complete restriction on the use of continuing education credentials or designations could lead to a different type of misrepresentation in some situations. For instance, a therapist with a hand therapy certificate who is publishing in a peer reviewed hand therapy journal is communicating with a target audience that would not only understand the designation, but would expect to see it. While the College continues to advise against the use of designations, initials or terms that denote specialization within the profession when offering or describing the services of occupational therapy to the public, there may be some instances where their use is considered an appropriate representation for others. Other examples include the use of designations on a curriculum vitae or as a description of human resources within a response to a request for proposals. In these situations the representation is not intended for the public but an audience that has a different knowledge base and understanding of the terms and credentials used.

Use of title "Doctor"

Registrants should be aware that within the *Regulated Health Professions Act* there is a restriction placed on the title "Doctor". This title is to be used only by those professions listed in Section 33 of the Act (i.e. chiropractors, optometrists, physicians, psychologists and dentists). Occupational therapy is not included in the list. It may be helpful to note that the prohibition applies only to the use of the title "Doctor" in the course of providing or offering to provide health care to individuals. Occupational therapists who hold a doctorate degree need to consider the intended purpose and audience when choosing to use this title. The principles of clear and appropriate representation to the public apply in these situations as well.

Section 33 of the Act states "Except as allowed in the regulations under this Act, no person shall use the title "doctor", a variation or abbreviation or equivalent in another language in the course of providing or offering to provide, in Ontario, health care to individuals."
Exceptions are stated for members of the Colleges governing chiropractors, optometrists, physicians and surgeons, psychologists and dental surgeons.

Use of Other University Degrees (not indicating specialization)

Not uncommonly, an occupational therapist will have obtained his/her occupational therapy training as a second degree, or will have pursued post-graduate degrees outside of OT, such as an M.Ed. or an MBA. These conferred degrees, obtained at a University level, can be used by registrants after their name in addition to the OT degree and the OT Reg. (Ont.) designation.

Job Titles

Recent trends toward interdisciplinary approaches to service delivery have contributed to the use of a large variety of job titles, often shared by individuals from different professions and sometimes specific to the organization. Job titles do not replace nor do they preclude the use of a professional designation. What remains important is the concept of clear and appropriate representation. The therapist should consider the audience and determine the most appropriate means of portraying their role to the client.

Misuse of Title

Title protection is a central tenet to the *Regulated Health Professions Act* and critical to a regulation model that certifies providers through title registration. The College takes seriously its role to safeguard public interest by ensuring that only competent occupational therapists use the title granted at registration. The misuse of title most frequently occurs when an individual who is not an occupational therapist uses title or practices in a manner which would lead a reasonable member of the public to presume he/she was a registered OT, or when an individual who is practicing occupational therapy has not registered with the College. All cases brought to the attention of the Registrar are investigated. Penalties for proven misuse of title bring a maximum penalty of \$5,000 for the first offence and \$10,000 for a second. Ensuring that only College registrants use title assists the profession with a clear public message of accountability and competency.

Appropriate representation of oneself to the public is also critical. A clear, transparent approach used consistently among the profession will help clients distinguish those OTs who are registered to use the title and thereby qualified to provide accountable, safe and ethical occupational therapy services in Ontario.