Standards for Use of Title

Issued November 2017

Replaces Guide to Use of Title, 2012
Introduction

In Ontario, only registrants of the College of Occupational Therapists of Ontario are permitted to use the title “occupational therapist”, the designation OT Reg. (Ont.) or any variation, abbreviation or equivalent in another language.

The titles used by regulated health professionals are protected though legislation. “Occupational therapist” is a protected title under the Occupational Therapy Act, 1991. Protected titles prevent misrepresentation and protect the public from harm that may be caused by people practising the profession who are not qualified.

The College takes seriously its role to safeguard public interest by ensuring that only registered occupational therapists (OTs) use the protected title. When an individual who is not an OT uses the protected title or practises in a manner that would lead a reasonable member of the public to think the individual is an OT, this is known as ‘holding out’ as an OT. Penalties for “holding out” bring a maximum fine of $25,000 for the first offence and up to $50,000 for a second offense (Occupational Therapy Act, 1991, c.33, s.9).

Ensuring that only College registrants use the protected title increases the credibility of the profession and provides a public message of accountability and competency.

This Standard describes the minimum expectations for use of title for OTs in Ontario and provides examples (Appendix A) of how the Standards for Use of Title apply in practice.

Application of the Standards for the Use of Title

• The following standards describe the minimum expectations for OTs.

• Performance indicators listed below each standard describe more specific behaviours that demonstrate the Standard has been met.

• It is not expected that all performance indicators will be evident all the time. It is expected performance indicators could be demonstrated by the OT if requested.

• There may be some situations where the OT determines that a particular performance indicator has less relevance due to client factors or environmental factors. Such situations may call for the OT to seek further clarification.

• It is expected that OTs will always use their clinical judgement to determine how best to communicate their title based on the scope of the practice, practice setting, client and stakeholder needs.
• It is expected that OTs will be able to provide reasonable rationale for any variations from the Standards.

In the event of any inconsistencies in these Standards for Use of Title with any other College standards, the standards with the most recent issue or revision date prevail.

Note that College standards may be used by the College or other bodies in determining whether appropriate standards of practice and professional responsibilities have been maintained.

Pursuant to the Regulated Health Professions Act, 1991 (RHPA), the College is authorized to make regulations in relation to professional practice. Ontario Regulation 95/07: Professional Misconduct establishes that “contravening, by act or omission, a standard of practice of the profession or failing to maintain a standard of the profession” constitutes professional misconduct.

Overview of the Standards for Use of Title

1. Protected Title
2. Misuse of Title
3. University Degrees
4. Student Occupational Therapists
5. College Applicants Completing a Refresher Program
6. Specialist Designations, Specialization and Areas of Practice
7. Additional Credentials
8. Use of Title Doctor
9. Job Titles
10. Applicants
11. Use of Title in Retirement or Following Resignation from the Profession

Appendix A – Application of Titles
1. **Protected Title**

By using a protected title, OTs are representing to the public that they are qualified to practice as an occupational therapist and are expected to provide occupational therapy service that meets the established standards of the profession. The reference to the province in the designation OT Reg. (Ont.) clearly identifies those registered with the College and entitled to practice in Ontario.

The College does not prescribe the order in which information is presented when communicating title in writing, however, it is expected that the protected title or designation maintains a position of prominence that easily allows a member of the public to identify the OT as a registrant of the College.

**Standard 1**

*The OT will use the protected title when representing that they are a registrant of the College.*

**Performance Indicators**

The OT will:

1.1 Accurately present themselves using the protected title “occupational therapist” and/or the designation “OT Reg. (Ont.)” (in English) or “ergotherapeute” or “Erg. Aut. (Ont.)” (in French).

1.2 Use the protected title “occupational therapist” or the designation OT Reg. (Ont.) when practising occupational therapy.

2. **Misuse of Title**

OTs can be found to be engaging in professional misconduct if they misuse a title (Ontario Regulation 95/07: Professional Misconduct).

**Standard 2**

*The OT will not misuse the protected title “occupational therapist” or the abbreviation “OT Reg. (Ont.)”.*

**Performance Indicators**

The OT will not:
2.1 Inappropriately use a term, title or designation in respect of his/her practice;
For example, using a designation such as Assistive Devices Program Authorizer when the OT is no longer a registered authorizer.

2.2 Use a term, title or designation indicating or implying a specialization in the profession;

2.3 Practice the profession using a name other than the name as entered in the register.
Note: OTs who wish to use a name other than their legal name must ensure their preferred name is recorded with the College to ensure it appears on the public register (“Find an Occupational Therapist”) and is accessible to the public.

3. University Degrees
Displaying university degrees is optional. OTs are not required to display university degrees but may choose to do so.

Individuals who have obtained a degree in occupational therapy can communicate this. However, if those individuals are not also registered with the College, they cannot use the title ‘occupational therapist’ or a variation thereof or hold themselves out as someone who is an occupational therapist.

Standard 3
The OT will ensure clear and transparent information when choosing to communicate their university degree(s) in addition to the protected title.

Performance Indicators
The OT will:

3.1 Display the protected title “occupational therapist” or the designation “OT Reg. (Ont.)” in addition to any conferred university degrees when communicating with clients and the public.
Example: Jane Doe, MBA, BSc (OT), OT Reg. (Ont.)
4. Student Occupational Therapists

The College only regulates occupational therapists. Students enrolled in occupational therapy university programs are not regulated by the College, however, conduct they engaged in while students may be relied upon by the College when assessing their suitability to practise the profession when those students later apply for registration. OTs play an essential role in the education and training of students. When assuming responsibility for the supervision of students, it is important that the public can clearly identify the individual as a student. Using a title that prominently identifies the role of the student in oral and written communication ensures accurate representation of the student and prevents the public from misinterpreting the accountability of the student. The approved title “Student Occupational Therapist” or “Student OT” ensures the clear identification of the student role.

**Standard 4**

_The OT will ensure students under their supervision use the approved title._

**Performance Indicators**

The OT will:

Ensure a student of occupational therapy under their supervision will only use the title “student occupational therapist” or “student OT” or “étudiant(e) en ergothérapie” or “étudiant(e) en erg.”.

4.1 **Note:** Placing the title “student” in front of “occupational therapist” immediately identifies the student role to the public.

Refer to the Standards for the Supervision of Students for additional information.

5. Applicants Completing a Refresher Program

Occasionally, the College receives applications from individuals who are required to complete a refresher program to meet the currency requirements for a certificate of registration. Most often this situation applies to individuals who have been away from practice for an extended period and are re-entering the profession. These individuals are not registrants of the College and are not eligible to use the occupational therapist title until they have successfully completed the refresher program.

**Standard 5**

_The OT supervising a College applicant completing a refresher program will ensure the applicant uses the approved title._
Performance Indicators

The OT will:

5.1 Ensure the refresher applicant uses the title “candidate occupational therapist” or “candidate OT” in the provision of occupational therapy services.

6. Specialist Designations, Specialization and Areas of Practice

The College does not have specialist designations. The College issues certificates of registration only for general practice reflective of the essential competencies required to practice occupational therapy safely, ethically and effectively.

Specialist designations for regulated health professionals are granted through a defined process, used to evaluate competence in a specific area of practice, that has been approved by a regulatory college. The College does not have a process to grant defined specialist designations. As such, it is considered professional misconduct to use a term, title or designation indicating or implying specialization in the profession. This position is also reflected in Ontario Regulation 226/96: General – Part V: Advertising, s. 23(2) that states “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.”

Defining an Area of Practice

Given the diversity within occupational therapy practice, OTs often develop knowledge and experience in a specific area of practice and focus their efforts on maintaining continuing competence within that focused area of practice. To assist the public in identifying an OT’s specific area of practice, it is suitable for an OT to state an area of practice or focus without implying specialization. For example, an OT who works only with children may choose to display “Practicing in Pediatrics” in addition to their occupational therapy title.

Standard 6

The OT will not use a title, designation or abbreviation that indicates or implies specialization or otherwise suggests that they are a specialist.
Performance Indicators

The OT will:

6.1 Not use a title or designation that indicates or implies specialization or otherwise suggests that the OT is a specialist.

Use a term such as “practising in” or “with a focus in” when communicating an area of practice within the profession of occupational therapy to the public.

Example: Jane Doe, OT Reg. (Ont.)
Practising in Driver Rehabilitation

6.2 John Doe, Occupational Therapist
With a focus in Vocational Rehabilitation

7. Additional Credentials

Additional credential refers to continuing education, training or certification completed by occupational therapists in addition to their occupational therapy degree. Such certifications, courses, or fields of study enrich the competence of OTs but are not required for entry to practice.

OTs who choose to use additional credentials will be held accountable for appropriate use by the College. Additional credentials will not be made publicly available by the College.

OTs are also permitted to communicate verbally and in writing designations such as Capacity Assessor or Assistive Devices Program (ADP) Authorizer.

Standard 7

The OT will ensure any additional credentials communicated to the public are truthful and accurate, and meet the required conditions.

Performance Indicators

The OT will:
7.1 Only use credentials that represent a training program that is current, evidence-based and theoretically sound.

7.2 Prior to communicating additional credentials to the public, ensure the credential meets the required conditions. To meet the required conditions, additional credentials must be:

- Valid and accurate;
- Applicable within the OT scope of practice;
- Related to the OT’s current area of practice;
- Accurately depicting the level of credential earned; and,
- Verifiable with evidence to be provided by the OT upon request.

7.3 Maintain competence associated with any additional credentials communicated to the public and upon request provide evidence of ongoing competence.

When communicating with clients and members of the public, use the protected title “occupational therapist” or the designation “OT Reg. (Ont.)” and the full name of the additional credential(s).

Examples: John Doe, MSc(OT), OT Reg. (Ont.)
Certified Hand Therapist

Jane Doe, Occupational Therapist
Certified Life Care Planner

Note: OTs can use an abbreviation of the additional credential when communicating with an audience who recognizes the credential. For example, an OT publishing research in a journal on hand therapy may use the abbreviation CHT to represent Certified Hand Therapist.

8. Use of the title “doctor”

Within the RHPA there is a restriction placed on the title “doctor”. Section 33 (1) of the RHPA 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 in the legislation permit the use of the title “doctor” by chiropractors, optometrists, psychologists, physicians, dentists, and naturopaths.

This restriction on the use of the title “doctor” applies when OTs are providing or offering to provide health care to individuals. OTs who hold a doctorate degree, which may include a PhD or a clinical
doctorate of occupational therapy (OTD) may use the title “doctor” in appropriate non-clinical circumstances, for example, when teaching or publishing research.

**Standard 8**

*The OT will only use the title “doctor” as permitted in legislation.*

**Performance Indicators**

The OT will:

- **8.1** Not use the title “doctor” orally or in writing when providing or offering to provide health care to individuals.
- **8.2** When holding a doctorate degree such as a PhD or OTD, only use the title “doctor” for non-clinical purposes.

**9. Job Titles**

Job titles are often shared by individuals from different professions and are sometimes specific to an organization. In situations where an individual’s job qualifications require them to be an occupational therapist or a regulated health professional, it is important for the OT to acknowledge their status as a regulated health professional in addition to their job title. By using the protected title together with a job title, the OT confirms their registration as an OT and their accountability to the College.

**Standard 9**

*The OT will use the protected title when their employment requires the qualifications of an occupational therapist or regulated health professional.*

**Performance Indicators**

The OT will:

- **9.1** Use the protected title “Occupational Therapist” or the designation “OT Reg. (Ont.)” when their employment requires the qualifications of an occupational therapist or regulated health professional and their job title does not include any reference to being an occupational therapist.
For example, an OT working in a generic role as a case manager could display their titles as follows:

Jane Doe, OT Reg. (Ont.)
Case Manager

10. Applicants

Individuals who have applied for registration with the College but are not yet registered are called applicants. Applicants are not legally entitled to work as OTs in Ontario. Applicants awaiting confirmation of registration status from the College, for either a provisional, general or temporary certificate of registration, are not permitted to use the protected title or designation. An applicant cannot use the title “candidate occupational therapist”. The “candidate” title is reserved only for individuals completing a College-approved clinical refresher placement under the supervision of a registered OT. See Standard 5.

Applicants are also not permitted to participate in orientation to an occupational therapy position, as this may be considered “holding out” as an OT.

11. Use of Title in Retirement or Following Resignation from the Profession

The College does not have an “inactive” or “retired” status that permits OTs to maintain a certificate of registration when they are no longer actively practicing the profession. OTs who have retired from the profession or resigned from the College cannot use the protected title.

Retired or former registrants may be called upon to share knowledge with service groups, the public, students, OTs or other professionals through formats such as presentations, articles or chapters in books. In this case, the former registrant should inform the audience that they are no longer registered and not entitled to practice. In many cases, it may be adequate for the former registrant to clearly communicate that they were educated as an OT and/or used to be an OT but do not currently provide occupational therapy services.

At times, it may be critical that the recipient of service has the assurance that the service provider is accountable to the regulator for ongoing competence. This may occur in situations where the service is being represented as occupational therapy or there is a risk that the service could be considered occupational therapy. In these circumstances, the individual must maintain their registration with the College to allow continued use of the protected title ‘occupational therapist’.
Former registrants who have retired or resigned from practice are entitled to continue to communicate their OT education.

For additional information on use of title in retirement refer to the Association of Canadian Occupational Therapy Regulatory Organizations resources referenced below.

References


Regulated Health Professions Act, 1991

Occupational Therapy Act, 1991

The Standards for the Use of Title (May 2017) replaces the Guide to Use of Title initially published in 2008 and revised in 2012.
Appendix A - Application of Titles

The College does not prescribe the order in which information is presented when communicating title in writing, however, it is expected that the protected title or designation maintains a position of prominence that easily allows a member of the public to identify the OT as a registrant of the College.

a) Protected Titles for General, Provisional or Temporary Registration (Standard 1)

- Occupational Therapist
- OT Reg. (Ont.)
- Ergothérapeute
- Erg. Aut. (Ont.)

Examples: Jane Doe, Occupational Therapist

Jane Doe,¹ OT Reg. (Ont.)

John Doe, Erg. Aut. (Ont.)

b) Use of University Degrees (Standard 3)

Displaying university degrees in addition to the protected title is optional.

Examples: John Doe, BSc(OT), OT Reg. (Ont.)

John Doe, MSc(OT), PhD, OT Reg. (Ont.)

Jane Doe, MBA, BASc(OT), OT Reg. (Ont.)

c) Students (Standard 4)

Approved titles for students:
- Student OT
- Student Occupational Therapist

Examples: Jane Doe

Student OT

John Doe, Student Occupational Therapist

¹ Although grammatically correct, OTs are not required to use commas when signing their signature and title in written or electronic format.
d) Applicants – Refresher Candidates (Standard 5)

Approved title for applicants completing a refresher program:

- Candidate Occupational Therapist
- Candidate OT

Example: Jane Doe, Candidate Occupational Therapist
Jane Doe, Candidate OT

e) Defining an Area of Practice (Standard 6)

Use terms such as “Practising in” or “with a focus on” that do not imply specialization within the profession.

Examples: Jane Doe, OT Reg. (Ont.)
Practising in Paediatrics

John Doe, MHA, BSc(OT)
Occupational Therapist focusing on Mental Health

f) Additional Credentials (Standard 7)

- Must meet all criteria for display of additional credentials
- Must include “occupational therapist” or “OT Reg. (Ont.)”

Examples: John Doe, MSc(OT), OT Reg. (Ont.)
Certified Hand Therapist

John Doe
Occupational Therapist
Certified Life Care Planner

Jane Doe, MHA, CHE*, OT Reg. (Ont.)
Vice-President, Professional Practice
*In this case CHE refers to Certified Health Executive and if used in a context where the audience is familiar with the additional credential, use of the abbreviation is acceptable.

g) Job Titles (Standard 9)

Examples: Jane Doe, MSc(OT), OT Reg. (Ont.)
Director, Professional Practice

John Doe, OT Reg. (Ont.)
Care Coordinator
## Glossary

| **Additional Credentials** | Continuing education, training or certification completed by occupational therapists in addition to their occupational therapy degree. A qualification, achievement or aspect of a person's background used to indicate that they are suitable for something and that is supported by documentation that proves a person’s qualifications. |
| **Abbreviated Designation** | The shortened form of the title “occupational therapist” used in place of the whole title. The approved abbreviation for “occupational therapist” is “OT Reg. (Ont.)” and for “ergotherapeute” is “Erg. Aut. (Ont.)” (in French) as stated in Ontario Regulation the General Regulations s.43 under the *Occupational Therapy Act, 1991*. |
| **Protected Title** | The professional title of the designated health professional under the *Occupational Therapy Act, 1991*. A registrant of the College of Occupational Therapists of Ontario is entitled to use the title “Occupational Therapist” or the abbreviation “OT Reg. (Ont.)” or “Ergotherapeute” or “Erg. Aut. (Ont.)” (in French). |
| **Specialist Designation** | Designations granted through a defined process, used to evaluate competence in a specific area of practice, that has been approved by a regulatory college. |