

Policy on paid services of a clinical nature by clinical graduate students outside of School of Psychology clinical practica and internship

Clinical graduate students in the School of Psychology are normally not permitted to provide clinical services outside of the program sanctioned practicum placements because they have not completed their academic program, clinical training, predoctoral internship and have not defended their dissertation.

However, clinical graduate students in the School of Psychology may provide paid services of a clinical nature under certain circumstances. In the student's best interest, the provision of paid services, in addition to program sanctioned clinical training practica, needs to be carefully balanced with timely completion of the clinical program.

This Policy on paid services of a clinical nature by clinical graduate students, outside of School of Psychology practica and internships, applies to:

- A) Clinical graduate students, registered or certified by a professional college or authority to provide autonomous services of a clinical nature, who are currently completing program requirements in the clinical psychology program of the School of Psychology;
- B) Clinical graduate students, *not* registered or certified to provide autonomous services of a clinical nature, who have completed all program requirements including the pre-doctoral internship, but not the dissertation;
- C) Clinical graduate students, *not* registered or certified to provide autonomous services of a clinical nature, currently completing program requirements in the clinical psychology program of the School of Psychology.

NB : An acknowledgment for students in the category A, or an application for students in category B or C must be submitted to the Graduate Studies Coordinator at the School of Psychology. The documentation must include a duly signed copy of the Policy on paid services of a clinical nature by clinical graduate students outside of the School of Psychology clinical practica and internships (A, B, or C). Students in category B and C, must also submit the completed and signed Contract to offer paid services of a clinical nature outside program sanctioned practicum hours. All students need to indicate the timeline for which they seek approval to provide paid work of a clinical nature. Acknowledgments (A) and applications (B and C) must be renewed on an annual basis.

A) Clinical graduate students, registered or certified to provide autonomous services of a clinical nature, who are currently completing program requirements in the clinical psychology program of the School of Psychology

1. A graduate student enrolled in the clinical psychology program at the School of Psychology certified to perform work of a clinical nature (e.g., counsellor) or registered with an allied mental health professional college (e.g., College of Registered Psychotherapists) may perform work of a clinical nature autonomously within the standards of their profession and their own license and insurance under the following conditions:
 - 1.1. The student is required to inform their dissertation supervisor of their autonomous provision of paid services of a clinical nature outside of approved clinical practica or internship;
 - 1.2. A student working autonomously must meet clinical program milestones and remain in satisfactory standing at the time of the Annual Student Review. Students who work more than 10 hours must consult with the clinical program director to ensure that their progress is maintained at a satisfactory pace, as stipulated in the University of Ottawa Academic Regulation (<https://www.uottawa.ca/about-us/policies-regulations/academic-regulations>; C-4, Satisfactory Academic Standing).
 - 1.3. The student acknowledges that, in concordance with the Canadian Psychological Association accreditation of the clinical program in the School of Psychology, paid work cannot exceed 20 hours per week;
 - 1.4. The student understands that employment providing autonomous services of a clinical nature is not approved clinical training at the School of Psychology and is not part of the requirements in the clinical program of the School of Psychology. Hours of autonomous work cannot be reported in the APPIC Application for Psychology Internships (AAPI) tabulation of approved clinical training hours.
 - 1.5. The student releases the School of Psychology and the University of Ottawa of all legal and professional responsibility in regard to their autonomous delivery of paid services of a clinical nature in the context of their profession;
 - 1.6. The student will deliver services of a clinical nature only within the scope of their previous training, competence, and certification/registration and works only within the standards of practice of their certification and/or the regulatory body of their profession¹;
 - 1.7. The student working autonomously in their profession cannot use their affiliation as a clinical graduate student in the School of Psychology at the University of Ottawa in their workplace self-representation (e.g., work-related documentation, website bios, etc.) and cannot communicate with clients or the workplace setting using their University of Ottawa email account;
 - 1.8. The student is very strongly encouraged to carry personal liability insurance for their autonomous work;
 - 1.9. The student reports, at the time of the Annual Student Review, that they are providing autonomous paid services of a clinical nature outside of approved practica or internships.
 - 1.10. The student providing autonomous paid services will sign an acknowledgement that they have read and understood the Policy on paid services of a clinical nature outside of the School of Psychology clinical practica and internship, and agrees to abide by this policy.

Compliance with this policy and its procedures is considered to be a matter of adherence to ethical procedures and standards of professional conduct. Failure to follow these procedures will result in an automatic review of status in the Clinical Program by the Clinical Program Committee.

B) Clinical graduate students, not previously registered or certified to provide autonomous services of a clinical nature, who have completed all program requirements including the pre-doctoral internship but not the dissertation.

1. Clinical students who have completed all program requirements but have not completed their dissertation may choose to deliver paid work of a clinical nature. The student is an *unregulated care provider* and all paid work of a clinical nature needs to be supervised by a registered clinical psychologist ([Regulated Health Professions Act, 1991 \(RHPA\)](#)), in good standing with the College of Psychologists of Ontario.
2. Students providing services of a clinical nature post-internship and outside of the purview of the University of Ottawa are not covered by University of Ottawa or Ministry of Colleges and Universities insurance policies should they incur an injury at their workplace or be subject to a complaint. Students are strongly encouraged to carry personal liability insurance.
3. Students providing services of a clinical nature post-internship must remain in satisfactory standing at the time of the Annual Student Review. Students who work more than 10 hours must consult with the clinical program director to ensure that their progress towards the completion of the program (dissertation) is maintained at a satisfactory pace, as stipulated in the University of Ottawa Academic Regulation (<https://www.uottawa.ca/about-us/policies-regulations/academic-regulations>; C-4, Satisfactory Academic Standing).
4. Students, offering paid services of a clinical nature, supervised by a clinical psychologist registered with the College of Psychologists of Ontario are permitted to provide the controlled act of psychotherapy.

Students in this category must meet the following conditions:

5. Submit proposed written contract to the Clinical Program Committee, signed by the student, the supervisor of the paid services of a clinical nature to be delivered, and the dissertation supervisor of the student. The contract must:
 - 5.1 stipulate the student's work duties;
 - 5.2 state the number of hours per week and the time period during which the student will be employed to deliver paid services of a clinical nature;
 - 5.3 confirm that, in concordance with the Canadian Psychological Association accreditation of the clinical program in the School of Psychology, work will not exceed 20 hours per week;
 - 5.4 include a statement indicating that the supervisor and student are aware that any clients seen under supervision belong to the practice of the supervisor who carries all legal and ethical responsibility, and that the School of Psychology and the University of Ottawa are released from all legal and professional responsibility in regard to the student's delivery of paid services of a clinical nature;
 - 5.5 stipulate the type and amount of supervision and that the supervisor is in good standing with the College of Psychologists of Ontario;
 - 5.6 include a statement that supervision will follow the professional standards for supervision of an unregulated care provider² set by the College of Psychologists of Ontario;
 - 5.7 include a statement that the student is aware of the regulatory body's restrictions on the controlled act of psychotherapy¹ and on use of professional titles (e.g., psychologist, psychotherapist)³;
 - 5.8 include an acknowledgment that the student will not use their affiliation with the University of Ottawa in their workplace self-representation (e.g., work-related documentation, website bios, etc.) and cannot communicate with clients and the workplace setting using their University of Ottawa email account.
6. The proposed supervisor of paid services of a clinical nature is not the student's dissertation supervisor.
7. The student may not provide paid services to any client(s) that they have seen in a practicum or internship, except with the approval of the Director of the Clinical Program.

8. The dissertation supervisor of the student approves the application to provide paid services of a clinical nature post-internship.
9. The student informs and seeks approval from the Clinical Program Committee for any changes in the contract or matters substantively related to the contract.
10. The student reports, at the time of the Annual Student Review, that they are providing paid services of a clinical nature outside of approved practica or internships.
11. The student providing autonomous paid services will sign an acknowledgement that they have read and understood the Policy on paid services of a clinical nature outside of the School of Psychology clinical practica and internship, and agrees to abide by this policy.

Compliance with this policy and its procedures is considered to be a matter of adherence to ethical procedures and standards of professional conduct. Failure to follow these procedures will result in an automatic review of status in the Clinical Program by the Clinical Program Committee.

C) Clinical graduate students not registered or certified to provide autonomous services of a clinical nature currently completing program requirements in the clinical psychology program of the School of Psychology

1. A graduate student enrolled in the clinical psychology program at the School of Psychology who is *not* certified or registered to perform autonomous paid work of a clinical nature, must submit to the Clinical Program Committee a *proposed* written contract, signed by themselves and the supervisor of the services of a clinical nature to be delivered by the student. In addition, the contract has to be approved by the student's dissertation supervisor.
2. The supervisor of the paid services must be a registered clinical psychologist ([Regulated Health Professions Act, 1991 \(RHPA\)](#)) in good standing with the College of Psychologists of Ontario;
3. The student understands that employment providing autonomous services of a clinical nature is not approved clinical training at the School of Psychology and is not part of the requirements in the clinical program of the School of Psychology. Hours of autonomous work cannot be reported in the APPIC Application for Psychology Internships (AAPI) tabulation of approved clinical training hours.
4. Students providing services of a clinical nature are not covered by University of Ottawa or Ministry of Colleges and Universities insurance policies should they incur an injury at their workplace or be subject to a complaint. Students are very strongly encouraged to carry personal liability insurance.
5. Students providing services of a clinical nature must remain in satisfactory standing at the time of the Annual Student Review. Students who work more than 10 hours must consult with the clinical program director to ensure that their progress towards the completion of the program is maintained at a satisfactory pace, as stipulated in the University of Ottawa Academic Regulation (<https://www.uottawa.ca/about-us/policies-regulations/academic-regulations>; C-4, Satisfactory Academic Standing).
6. Students providing paid work of a clinical nature are not functioning in the role of a clinical graduate or doctoral student. Their title at the workplace needs to reflect that they are an

unregulated care provider; the title may reflect their role at the workplace setting. Students and their supervisors are working in accordance with the [Regulated Health Professions Act, 1991 \(RHPA\)](#) and adhere to restrictions on use of titles^{1,2,3}.

Students in this category must meet the following conditions:

7. Submit proposed written contract, signed by the student, the supervisor of the paid services of a clinical nature to be delivered, and the dissertation supervisor of the student; the contract must:
 - 7.1. stipulate the student's work duties;
 - 7.2. state the number of hours per week and the time period during which the student will be engaged in the delivery of paid services of a clinical nature;
 - 7.3. confirm that in concordance with the Canadian Psychological Association accreditation of the clinical program in the School of Psychology, work will not exceed 20 hours per week;
 - 7.4. stipulate the type and amount of supervision and that the supervisor is in good standing with the College of Psychologists of Ontario;
 - 7.5. include a statement that supervision will follow the regulations, standards, and guidelines for the supervision of an unregulated care provider set by the College of Psychologists of Ontario;
 - 7.6. include a statement indicating that the supervisor and student are aware that any clients seen under supervision belong to the practice of the supervisor who carries all legal and ethical responsibility, and that the School of Psychology and the University of Ottawa are released from all legal and professional responsibility in regard to the student's delivery of paid services of a clinical nature;
 - 7.7. include a statement that the student is aware of regulatory body's restrictions on the controlled act of psychotherapy¹ and will not use protected professional titles (e.g., psychologist, psychotherapist)³;
 - 7.8. include an acknowledgment that the student will not use their affiliation with the University of Ottawa in their workplace self-representation (e.g., work-related documentation, website bios, etc.) and cannot communicate with clients and the workplace setting using their University of Ottawa email account.
8. The proposed supervisor of paid services of a clinical nature is not the student's thesis supervisor.
9. The student may not provide paid services to any client(s) that they have seen in a practicum, except with the approval of the Director of the Clinical Program.
10. The dissertation supervisor of the student approves the application to provide paid services of a clinical nature outside School of Psychology approved practica and internships.
11. The student informs and seeks approval from the Clinical Program Committee for any changes in the contract or matters substantively related to the contract.
12. The student indicates, at the time of the Annual Student Review, that they are providing paid services of a clinical nature outside of approved practica or internships.
13. The student providing autonomous paid services will sign an acknowledgement that they have read and understood the Policy on paid services of a clinical nature outside of the School of Psychology clinical practica and internship, and agrees to abide by this policy.

Compliance with this policy and its procedures is considered to be a matter of adherence to ethical procedures and standards of professional conduct. Failure to follow these procedures will result in an automatic review of status in the Clinical Program by the Clinical Program Committee.

For A --- Acknowledgment

Student

I have read, understood, and will abide by this policy:

Student (*signature and date*)

Dissertation Supervisor

I have been informed of the autonomous provision of paid services of a clinical nature.

Research Supervisor (*signature and date*)

Program

I have been informed of the student's work of a clinical nature and I certify that their progress in the program is satisfactory.

Director of the Clinical Program (*signature and date*)

For B and C --- Application

We have read, understood, will abide by this policy, and provided all information as stipulated by the Policy the proposed contract.

Student

Student (*signature and date*)

Clinical Supervisor

Clinical Supervisor (*signature and date*)

I have read the proposed contract of paid work outside program sanctioned clinical practica and internship and recommend approval of the request.

Dissertation Supervisor

Research Supervisor (*signature and date*)

Program

Request Approved ☐ Request refused ☐

Please select the approval period

From to

Director of the Clinical Program (*signature and date*)

¹ **Controlled Act of Psychotherapy**

Only registered members of the following Ontario colleges are authorized to perform the controlled act of psychotherapy: College of Registered Psychotherapists of Ontario, College of Psychologists of Ontario, Ontario College of Social Workers and Social Service Workers, College of Nurses of Ontario, College of Occupational Therapists of Ontario, and College of Physicians and Surgeons of Ontario.

The controlled act is defined in the [Regulated Health Professions Act, 1991 \(RHPA\)](#) as: “Treating, by means of psychotherapy technique, delivered through a therapeutic relationship, an individual’s serious disorder of thought, cognition, mood, emotional regulation, perception or memory that may seriously impair the individual’s judgment, insight, behaviour, communication or social functioning.”

<https://www.ontario.ca/laws/statute/07p10>

Only registrants of one of 6 Colleges are permitted to supervise students performing the controlled act of psychotherapy. Only those students who are completing their studies to become a registrant of this College can perform the controlled act of psychotherapy. (*Regulated Health Professions Act, 1991 (RHPA)*, Ontario Regulation 107/96: Controlled Acts section 7.3;

<https://www.ontario.ca/laws/regulation/960107>)

This means: *Only those students supervised by a member of the CPO can provide the controlled act of psychotherapy.*

² **CPO Professional Standards for supervision:**

<https://cpo.on.ca/members/professional-practice/standards-of-professional-conduct/#supervision>

³ **Protected titles:**

In Ontario, only registered members of six Ontario colleges can use the title *psychotherapist*, (RHPA, 1991; <https://www.ontario.ca/laws/statute/91r18>).

Furthermore, unregulated care providers cannot use the titles *Psychologist* or *Psychological Associate*, or use the terms *psychology* or *psychological*, or any abbreviation of those words in any title, designation or description of services offered or provided (*Psychology Act (1991)*).

Approved by the Clinical Program Committee, June 7, 2023