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May 2, 2018

Ms Louise Verity
Director, Policy and Communications
College of Physicians and Surgeons of Ontario
80 College Street
Toronto, Ontario M5G 2E2

Dear Ms Verity:

We are writing to you to request clarification regarding three issues related to the recently updated policy: "Ensuring Competence: Changing Scope of Practice and/or Re-entering Practice". As representatives of the Medical Psychotherapy Association of Canada (MDPAC) we are specifically interested in the issue of physicians focusing their practice in psychotherapy. We responded to the request for feedback regarding this policy when it was in draft form in the fall of 2017.

1. We believe that this is the first time that psychotherapy has been specifically named as constituting a change in scope for family physicians. We would request clarification from the CPSO as to whether this correct.

2. The updated policy states that the Change of Scope provisions would apply to:

"A family physician who wishes to primarily practise and receive referrals for psychotherapy, disorders of the skin, or palliative care."

Our understanding of the updated policy, as it applies to the practice of psychotherapy by family physicians is that:

- If a family physician wishes to do psychotherapy with some of their own patients, there is no change of scope.
- If a family physician wishes to focus their practice to primarily psychotherapy, and receive referrals from other doctors, the change of scope provisions would apply.

We would request clarification from the CPSO whether our interpretation of the updated policy is correct.

3. The updated Policy was approved by CPSO Council in February, 2018.

Our association has recently received several reports from our members that the CPSO may be applying this policy retroactively for physicians who focused their practice in psychotherapy in past years, i.e. prior to February 2018. The undated document: "Changing Scope of Practice- A Physicians Guide" which is on the CPSO website includes the following question, as well as the response to the question:

"I have determined that I have changed my Scope of Practice since 2002, and I have to fill out the Application for Physicians who HAVE CHANGED their scope of practice. What will happen next?"

We would request clarification from the CPSO regarding the effective date for the application of the updated Policy, as there appears to be some confusion about this.

We look forward to your prompt response.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian McDermid', written over a light grey grid background.

Brian James McDermid MD, MES, MTFAPA, CCFP, MDPAC(C)
President, MDPAC

A handwritten signature in black ink, appearing to read 'Catherine Low', written in a cursive style.

Catherine Low B.Sc.(Med), MD, MDPAC(C)
Chair, MDPAC