
USE OF PROFESSIONAL TITLES, DESIGNATIONS AND CREDENTIALS

Policy P-010
Executive Committee
Approved by Council: April 30, 2019

Note to Readers: In the event of any inconsistency between this document and the legislation that affects chiropractic practice, the legislation governs.

INTENT

To summarize and describe the legislative and regulatory requirements for CCO members' uses of professional titles, designations and credentials.

DESCRIPTION OF POLICY

One of the objectives of the *Regulated Health Professions Act, 1991 (RHPA)* is that the public of Ontario is able to make an informed decision about their health care choices. It is essential that members of regulated health professions in Ontario clearly and accurately communicate to the public their professional titles, designations and credentials, so the public knows which regulated health professional they are seeking care from.

The *RHPA*, profession specific legislation (such as the *Chiropractic Act, 1991*), and CCO regulations, standards of practice, policies and guidelines outline certain requirements for the use of professional titles, designations and credentials. The following policy summarizes and describes several of those requirements that apply to members of CCO.

Use of the Title “Doctor”

Legislative and Regulatory Context

Section 33 of the *RHPA* authorizes members of the College of Chiropractors of Ontario to use the title “doctor”, a variation or abbreviation or an equivalent in another language in the course of providing or offering to provide, in Ontario, health care to individual. No person shall use the title “doctor” in this context, except for those regulated health professionals listed in section 33 of the *RHPA*.

Application to CCO Members

Members of CCO may use the title “doctor” in the course of providing or offering to provide, in Ontario health care to individuals. A member shall ensure that their professional representation to the public is clear and unambiguous that they are a member of CCO and does not misrepresent to the public that they are a member of another regulated health profession.

Chiropractic Specialties

Legislative and Regulatory Context

It is an act of professional misconduct for a member of CCO to “use(ing) a term, title or designation indicating a specialization in the profession contrary to the policies of the College”.

Policy P-029: Chiropractic Specialties <https://www.cco.on.ca/wp-content/uploads/2017/11/P-029.pdf> indicates the following as approved specialties:

- FCCS(C) - Fellow of the College of Chiropractic Sciences (Canada)
- FCCR(C) - Fellow of the Chiropractic College of Radiologists (Canada)
- FRCCSS(C) - Fellow of the Royal College of Chiropractic Sports Sciences (Canada)
- FCCOS(C) - Fellow of the College of Chiropractic Orthopaedic Specialists (Canada)
- FCCPOR(C) - Fellow of the Canadian Chiropractic Specialty College of Physical and Occupational Rehabilitation (Canada)

Application to Members

Members of CCO may not indicate a specialization in the profession of chiropractic, except for those members who belong to the specialty colleges listed above.

This policy does not restrict a member from indicating educational degrees and professional credentials that are accurate, verifiable and not misleading to the public.

Restricted Titles of Other Regulated Health Professions Acts

Legislative and Regulatory Context

Regulated health professions in Ontario each have specific acts governing their professions, which restrict titles to members of that regulated health profession. For example, under the *Chiropractic Act, 1991*, only members of CCO may use the title of “chiropractor” or hold themselves out as a person who is qualified to practise in Ontario as a chiropractor or in a specialty of chiropractic.

The following are examples from selected Ontario Regulated Health Professions Act, restricting the use of certain professional titles and representations to the public.

Medicine Act, 1991

9 (1) No person other than a member shall use the titles “osteopath”, “physician” or “surgeon”, a variation or abbreviation or an equivalent in another language.

Dentists excepted

(2) Subsection (1) does not apply to the use of the title “surgeon”, a variation or abbreviation or an equivalent in another language by a member of the Royal College of Dental Surgeons of Ontario.

Representations of qualification, etc.

(3) No person other than a member shall hold himself or herself out as a person who is qualified to practise in Ontario as an osteopath, physician or surgeon or in a specialty of medicine.

Definition

(4) In this section,
“abbreviation” includes an abbreviation of a variation.

Physiotherapy Act, 1991

8 (1) No person other than a member shall use the title “physiotherapist” or “physical therapist”, a variation or abbreviation or an equivalent in another language.

Representations of qualification, etc.

(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 physiotherapist or in a specialty of physiotherapy.

Definition

(3) In this section,
“abbreviation” includes an abbreviation of a variation.

Traditional Chinese Medicine Act, 2006¹

8. (1) No person other than a member shall use the titles “traditional Chinese medicine practitioner” or “acupuncturist”, a variation or abbreviation or an equivalent in another language.

Representations of qualification, etc.

(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 traditional Chinese medicine practitioner or acupuncturist or in a specialty of traditional Chinese medicine.

Definition

(3) In this section,
“abbreviation” includes an abbreviation of a variation.

Naturopathy Act, 2006

8. (1) No person other than a member shall use the title “naturopath”, a variation or abbreviation or an equivalent in another language.

Representations of qualification, etc.

(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 naturopath or in a specialty of naturopathy.

Definition

(3) In this section,
“abbreviation” includes an abbreviation of a variation.

¹ Please see Standard of Practice S-017: Acupuncture <https://www.cco.on.ca/wp-content/uploads/2017/10/S-017.pdf> for further details about use of titles related to the use of acupuncture.

Massage Therapy Act, 1991

7 (1) No person other than a member shall use the title “massage therapist” or “registered massage therapist”, a variation or abbreviation or an equivalent in another language. 2009, c. 26, s. 13 (2).

Representations of qualifications, etc.

(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 massage therapist or registered massage therapist or in a specialty of massage therapy.

Definition

(3) In this section, “abbreviation” includes an abbreviation of a variation.

Veterinary Act, 1990

40. (2) Every person who is not a holder of a licence and who,
(a) uses the title “veterinarian”, “vétérinaire”, or “veterinary surgeon”, “chirurgien vétérinaire” or an abbreviation or variation thereof as an occupational or business designation; or
(b) uses a term, title or description that will lead to the belief that the person may engage in the practice of veterinary medicine,
is guilty of an offence and on conviction is liable for the first offence to a fine of not more than \$5,000 and for each subsequent offence to a fine of not more than \$15,000.

Application to CCO Members

Please note: This section does not apply to members who are also members of more than one regulated health profession in Ontario. For more information on practising as a member of more than one regulated health professional in Ontario, please see Standard of Practice S-011: Members of More Than One Health Profession <https://www.cco.on.ca/wp-content/uploads/2017/10/S-011.pdf>.

Members of CCO must clearly, accurately and unambiguously communicate to the public, including in their patient care and communication, record keeping, financial and billing practices, and advertising, websites and social media, that they are members of CCO and must not hold themselves out or misrepresent to the public that they are members of another regulated health profession.

CCO considers the use of titles and professional representations, including but not limited to “chiropractic physician”, “medicine”, “orthopractic”, “functional neurologist” and “osteopath”, and other abbreviations or variations of any of the legislatively restricted titles or specialties, as misleading to the public and must not be used.

A member may communicate modalities that the member uses in practice, consistent with CCO standards of practice, such as physical therapy, acupuncture as an adjunctive treatment² and chiropractic care of animals. These modalities must be communicated as services rather than titles. It must always be clear and unambiguous to the public that the member is using these modalities as a member of CCO, practising within the chiropractic scope of practice.

A member who holds themselves out falsely or inaccurately as practising a profession or using a title that is not authorized to them is risking being prosecuted for practising without a certificate of registration by the appropriate college.

LEGISLATIVE CONTEXT

Ontario Regulation 852/93: Professional Misconduct

The following are acts of professional misconduct for the purposes of clause 51.1 (c) of the Health Professionals Procedural Code.

16. Using a term, title or designation in respect of a member's practice contrary to the policies of the College.
17. Using a term, title or designation indicating a specialization in the profession contrary to the policies of the College.
18. Using a name, other than the member's name as set out in the register, in the course of providing or offering to provide services within the scope of practice of the profession.

This policy should be read in conjunction with:

- Standard of Practice S-011: Members of More Than One Health Profession
- Standard of Practice S-016: Advertising
- Standard of Practice S-017: Acupuncture
- Policy P-029: Chiropractic Specialties
- Guideline G-016: Advertising

² Please see Standard of Practice S-017: Acupuncture <https://www.cco.on.ca/wp-content/uploads/2017/10/S-017.pdf> for further details about use of titles related to the use of acupuncture.

