

March 2024

Registration & Use of Title

PROFESSIONAL PRACTICE GUIDELINE



Professional Practice Guideline

College of Respiratory Therapists of Ontario (CRTO) publications contain practice parameters and standards that should be considered by all Ontario Respiratory Therapists (RTs) in the care of their patients/clients and in the practice of the profession. CRTO publications are developed in consultation with professional practice leaders and describe current professional expectations. All Members are required to abide by these CRTO publications, and they will be used in determining whether appropriate standards of practice and professional responsibilities have been maintained.

It is important to note that employers may have policies related to registration and use of title. If an employer's policies are more restrictive than the CRTO's expectations, the RT must abide by the employer's policies. Where an employer's policies are more permissive than the expectations of the CRTO, the RT must adhere to the expectations of the CRTO.

Table of Contents

Introduction	4
Classes of Registration	5
General Certificate of Registration	5
Graduate Certificate of Registration	5
Limited Certificates of Registration	7
Inactive Certificates of Registration	7
Emergency Certificates of Registration	8
Protected Titles.....	9
Professional Designations, Professional Titles & Job Titles	9
Student Respiratory Therapists (SRT)	12
Terms, Conditions and Limitations.....	12
CRTO Public Register	13
Maintaining Registration with the CRTO.....	14
Resignation.....	15
Suspension (for Failure to Renew Membership)	15
Revocation (for Failure to Renew Membership).....	15

Introduction

The *Regulated Health Professions Act, 1991* (RHPA) sets out the framework for the regulation of health professions in Ontario. This piece of legislation grants the privilege of self-regulation to Respiratory Therapists as well as other healthcare professionals. The *RHPA* also permits each regulatory College to determine the appropriate registration requirements for its own profession. In addition, as a public protection mechanism, the profession-specific Acts restrict the use of certain professional titles and designations to members of health regulatory Colleges.

The *Respiratory Therapy Act, 1991* (RTA) confers the title “Respiratory Therapist” to those individuals who have met the College of Respiratory Therapists of Ontario’s (CRTO) registration requirements. The intent of this practice guideline is to offer clarification with respect to the different classes of registration, protected titles and maintaining one’s registration with the CRTO.

Classes of Registration

All Members of the CRTO are issued a “certificate of registration.” A member’s certificate may be issued in either the General, Graduate, Limited (Practical), Inactive or Emergency class. All CRTO Members are “Respiratory Therapists” regardless of the class of certificate of registration they hold.

General Certificate of Registration

A General Certificate may be issued to an individual who has met all registration requirements, including academic requirements, and has successfully completed the registration examination approved by the CRTO, or met the registration requirements under labour mobility provisions. A Member holding a General Certificate of Registration, must use the designation “RRT” when practising the profession and may use “Registered Respiratory Therapist” or “Respiratory Therapist” as their protected title.

Graduate Certificate of Registration

A Graduate Certificate may be issued to an individual who has met all registration requirements, including academic requirements, but has not yet successfully completed the registration examination approved by the CRTO. A Member holding a Graduate Certificate of Registration, must use the designation “GRT” and may use “Graduate Respiratory Therapist” as their protected title. This is a temporary class of registration. **A Graduate Certificate of Registration is automatically revoked after 18 months.**

The following conditions apply to a Graduate Certificate of Registration:

The (Graduate) Member shall,

1. at the first reasonable opportunity, advise every employer of any terms, conditions, and limitations that apply to the Member’s Graduate Certificate of registration if their employment is in the field of Respiratory Therapy;
2. only perform a controlled act that is authorized to the profession if it is performed under the general supervision of a member of a College within the meaning of the *Regulated Health Professions Act, 1991* who, the Member holding the Graduate Certificate has reasonable grounds to believe, is authorized to perform the controlled act, and is competent to do so and who is available to be personally present at the site where the authorized act is performed on ten minutes notice;
3. not delegate a controlled act;
4. not perform advanced prescribed procedures below the dermis; and
5. not perform authorized act #5 “administering a prescribed substance by inhalation”.
6. .

A Graduate Certificate is deemed to have been revoked 18 months after its initial date of issue.

Table 1: Controlled Acts Authorized to Respiratory Therapists

Authorized Acts (under the <i>Respiratory Therapy Act</i>)	GRT Can Perform*
1. Performing a prescribed procedure below the dermis-	✓ (Basic procedures only)
2. Intubation beyond the point in the nasal passages where they normally narrow or beyond the larynx-	✓
3. Suctioning beyond the point in the nasal passages where they normally narrow or beyond the larynx-	✓
4. Administering a substance by injection or inhalation-	✓
5. Administering a prescribed substance by inhalation ¹ -	X
Exceptions (under the <i>Controlled Acts Regulation</i>)	GRT can Perform*
1. Performing a tracheostomy tube change ²	✓
2. Use of diagnostic ultrasound ³	✓

*please note that general supervision is required.

Notes:

1. Graduate Respiratory Therapists (GRTs) are not permitted to independently self-initiate oxygen therapy as per authorized act #5 (“administering a prescribed substance”). However, GRTs can still administer oxygen, and other substances (e.g., bronchodilators) as per authorized act #4 (“administering a substance by injection or inhalation”) provided they have a valid order (direct or via a medical directive) from an authorized prescriber (e.g., physician).
2. All Members of the CRTO are permitted under the Controlled Acts Regulation to change a tracheostomy tube, subject to any terms, conditions and limitations on their certificates of registration. However, it is the position of the CRTO that GRTs are not permitted to perform a tracheostomy tube change for a stoma that is less than 24 hours old.
3. Ultrasound must be ordered by a member of the College of Physicians and Surgeons of Ontario or the College of Nurses of Ontario (Extended Class).

PLEASE NOTE:

In addition to GRTs not being permitted to delegate controlled acts, the CRTO's position is that GRTs should not **accept** delegation of any controlled act.

For example, a GRT working in a pulmonary function lab cannot accept delegation to implement the controlled act "*Communicating to the individual or his or her personal representative a diagnosis...*". GRTs require general supervision for the acts authorized to RTs (listed above). It is, therefore, in the best interest of patients/clients for GRTs to first focus on developing their competency in core areas of RT practice.

Limited Certificates of Registration

Limited Certificates were issued to individuals who had not met all requirements for a General Certificate of Registration but provided sufficient evidence to a Panel of the Registration Committee of their competence in a defined area of the scope of practice of the profession. The CRTO stopped issuing Limited Certificates of Registration on February 25, 1999. If a Member holds a Limited Certificate of Registration, they must use the designation "PRT" and may use "Practical Respiratory Therapist" (PRT) as their protected title.

NOTE:

It is important that Members clearly identify themselves by their respective professional designation and/or title on their name badge and when documenting in the patient/client record.

Inactive Certificates of Registration

A Member registered with a General or Limited Certificate of Registration may apply for an Inactive Certificate of Registration provided they are not practising the profession* in the broadest sense of that phrase.

NOTE:

A GRT is not permitted to apply for an Inactive Certificate of Registration.

The following conditions apply to an Inactive Certificate of Registration: The (Inactive) Member shall not,

- engage in providing direct patient care;
- use the protected title or designation;
- supervise the practice of the profession; or
- make any claim or representation to having any competence in the profession

*for additional information on what it means to be “practising the profession”, please review the CRTO’s [Am I Practising Fact Sheet](#).

NOTE:

An Inactive Member is not permitted to serve as a CRTO Council Member or Committee Appointee.

Emergency Certificates of Registration

An Emergency Certificate may be issued when the government has requested that CRTO initiate registrations under the Emergency Class, or the CRTO Council has determined that there are emergency circumstances and that it is in the public interest to issue Emergency Certificates of Registration. If a Member holds an Emergency Certificate of Registration, they must use the designation RT(E) and may use “Respiratory Therapist (Emergency)” as their protected title.

An Emergency Certificate of Registration expires twelve (12) months after it is issued unless it is renewed or six (6) months after Council determines that emergency circumstances no longer exist.

The following conditions apply to an Emergency Certificate of Registration:

The Member shall,

- (a) at the first reasonable opportunity, advise every employer of any terms, conditions and limitations that apply to the Member’s Emergency Certificate of registration if their employment is in the field of respiratory therapy
- (b) only perform a controlled act that is authorized to the profession if it is performed under the general supervision of a Member who holds a certificate in the General Class of Registration and who is available to be present at the site on ten minutes notice; and
- (c) not delegate a controlled act*.

* It is the CRTO’s position that Members who cannot delegate a controlled act, cannot accept delegation for a controlled act.

Protected Titles

In Ontario, the title “Respiratory Therapist” is protected under the *Respiratory Therapy Act, 1991 (RTA)*.

. This means that to use the “Respiratory Therapist” title or any variation or abbreviation of that title, and/or hold oneself out as qualified to practice respiratory therapy in Ontario, a person must be registered with the CRTO¹.

Professional Designations, Protected Titles & Job Titles

Professional title is the full expression of the title, as it corresponds to the Member’s certificate of registration.

Designation is the abbreviation of the professional title.

Job title is often the term given by employers, educational facilities, and certification bodies to designate certain professional roles. These titles are not protected under law but can be used in addition to the protected professional title/designation to highlight the RT’s credentials and/or position within their organization.

Section 67 of the Registration Regulation (O. Reg. 596/94) specifies that:

Members may use the **protected title** that corresponds to their certificates of registration (see table 2 below).

- Members must use the **designation** that corresponds to their certificates of registration(see table 2 below)

Job titles may also be used, but they must be accompanied by the appropriate designation.

Table 2: Professional Designations, Protected Titles & Job Titles

Class of Registration	Designation	Protected Title	Job Title
General	RRT	Registered Respiratory Therapist or Respiratory Therapist	Anesthesia Assistant (AA) Patient
Graduate	GRT	Graduate Respiratory Therapist	Educator
Limited (Practical)	PRT	Practical Respiratory Therapist	Registered Polysomnography Technician (RPSGT) Certified Respiratory Educator (CRE)

¹ With the exception of Inter-jurisdictional Respiratory Therapists who meet the conditions under O. Reg. 199/23 Exemption – Restricted Titles, which include having submitted an application for registration to the CRTO.

Emergency	RT(E)	Respiratory Therapist (Emergency)	
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Documents or records signed by a Member or used by a Member in a professional capacity (e.g., business card) **must** include, at a minimum, their name and their professional designation (e.g., RRT).

Example...

An RT who has successfully completed an Anesthesia Assistant certification program may use “AA” when working in their role as an AA, provided their designation is listed first (i.e., RRT/AA). Additional information regarding the AA role can be found in the CRTC’s Respiratory Therapists as Anesthesia Assistants Professional Practice Guideline.

Registered Names

It is also important that when practising the profession, Members use the name that they have registered with the CRTC in all interactions with the public and the healthcare team. The name used to register with the CRTC is the one that is found on the Public Register and is used to identify the Member as being registered with the CRTC. The [Professional Misconduct Regulation \(O. Reg. 753/93\)](#) states that it is professional misconduct for a Member to be “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”.

PLEASE NOTE:

It is an expected standard of practice that RTs manage their professional and therapeutic relationships by “introducing themselves to patients/clients and other members of the healthcare team using their name and professional title” (CRTC [Standards of Practice - Standard 13](#). Professional Responsibilities - Responsibilities to the Profession and the Public).

If a Member feels that identifying themselves by name could put them at risk, they should seek further assistance by contacting the CRTC.

PLEASE NOTE:

In 1999, the CRTC adopted the use of the title **Registered Respiratory Care Practitioner (RRCP)** to identify Registered Respiratory Therapists (RRTs) in Ontario. At the time, it was felt that this title more accurately reflected the role of CRTC Members. However, Members who responded to a survey conducted by the CRTC in June 2002 were overwhelmingly in favour of returning the professional title and designation back to Registered Respiratory Therapist (RRT) because they believed that the RRCP designation caused confusion for both the healthcare team and the public. As a result, the CRTC Council voted in September 2003 to amend the [Registration Regulation](#) and returned Registered Respiratory Therapists (RRT) as the official professional title and designation for Respiratory Therapists in Ontario.

Professional titles and designations are intended to help safeguard the public by making registered members of health professions easy to identify. Using a title and designation that is no longer official may be contrary to this intention and, therefore, the title “Registered Respiratory Care Practitioner” and the designation “RRCP” is not to be used by Members of the CRTC. For the correct professional titles and designation for the various classes of registration, please see the table on page 10.

Student Respiratory Therapists (SRT)

Students enrolled in an approved RT education program are not Members of the CRTC, but the CRTC encourages them to use the title Student Respiratory Therapist (SRT) while fulfilling the requirements to become a Respiratory Therapist.

Terms, Conditions and Limitations

Terms, conditions, and limitations are restrictions that may appear on any certificate of registration. In general terms, such restrictions are imposed to protect the public. These restrictions may be imposed by regulation (e.g., preventing Inactive Members from engaging in practice), or by one of the CRTC's statutory committees on a particular Member, such as disciplinary action. The Registration Committee may also direct that terms, conditions, or limitations be placed on a certificate of registration when reviewing an application for registration. For example, the Registration Committee may direct that an RT practice under supervision when the Member has been away from practice for an extended period of time and does not meet the CRTC's currency requirement.

Terms, conditions, and limitations may be removed from a certificate of registration in a variety of ways, including:

- submitting a request to, and receiving approval from, the committee which originally put the restrictions in place; and
- meeting pre-set conditions, such as completing a Specified Continuing Education or Remediation Program (SCERP), or providing acceptable evidence of competence to perform a procedure.

Terms, conditions, or limitations imposed on a Member's certificate of registration are part of the CRTC's [online Public Register](#). Additional information about TCLs can be found in the CRTC's [Terms, Conditions and Limitations Fact Sheet](#).

CRTO Public Register

The *Regulated Health Professions Act, 1991 (RHPA)* requires all health regulatory colleges to maintain a register of Member information that is publicly available on their websites. The CRTO online Public Register includes the information required under the RHPA, and additional information outlined in the CRTO's By-laws.

Examples of information provided on the online Register include:

- Members' names, and where applicable, former names
- Members' class of registration, registration number, and registration status
- Any conditions or restrictions imposed on Members' certificates of registration
- Information about Members' practice locations,
- The language(s) in which Members are able to provide respiratory therapy services
- Registration history, for example, information about Members' registration with the CRTO, including changes to the class and registration status
- Information about registration or licensure in other professions or with other RT regulators
- Information about health profession corporations
- Conduct information, for example,
 - Results of past hearings
 - Notations of pending hearings, for example, when a Member has been referred for a hearing before CRTO's Discipline or Fitness to Practise Committee
 - Notations of every caution that a Member has received from a panel of the Inquiries, Complaints and Reports Committee (ICRC) and any specified continuing education or remedial programs required by a panel of the ICRC
 - Information about convictions, if for example, a Member has been found guilty of an offence under the *Criminal Code of Canada*, or under the *Health Insurance Act*, or under the *Controlled Drugs and Substances Act (Canada)*, or any other offences that relate to the Member's suitability to practise. Information about charges under the *Criminal Code of Canada*, or under the *Health Insurance Act*, or under the *Controlled Drugs and Substances Act (Canada)*, or any other offences that relate to the Member's suitability to practise, including where applicable bail conditions.
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The Register also includes information about former Members of the CRTO, . the

date on which the Member ceased to be registered, and the reason for the cessation of membership.

For more information, please see the [Public Register Fact Sheet](#).

Maintaining Registration with the CRTC

Members of the CRTC must renew their registration on an annual basis, by completing the online registration renewal form and by paying the annual renewal fee. In addition, Members are required to:

- Practise according to the standards of practice established in the legislation, regulations and CRTC guidelines;
- Participate in the CRTC Professional Development Program;
- Maintain Professional Liability Insurance (PLI) in the amounts and coverage set out in the CRTC By-Law 3. For additional information about the PLI requirement, please review the [Professional Liability Insurance Policy Fact Sheet](#);
- Inform the CRTC of any change to their personal contact information and employment status
- Self-report information about themselves as outlined in section 23 of the Code and the CRTC By-Law 3. For example,
 - Information related to charges and/or findings of guilt related to offenses,
 - Findings/proceedings of professional negligence or malpractice,
 - Findings/proceedings of professional misconduct, incompetence, incapacity, or other similar finding by another professional regulatory/licensing authority in any jurisdiction.

Additional Information...

For additional information on mandatory reporting obligations, please review the CRTC's [Mandatory Reporting by Members](#) and [Mandatory Reporting by Employers/Facilities Fact Sheets](#).

Certificates of registration must be renewed annually and failure to provide the requested information at renewal time, or pay the renewal fee by the CRTC's deadline, may result in suspension of a Member's certificate of registration. A person who no longer wishes to be a Member of CRTC must formally resign their certificate; simply failing to renew on time or pay the renewal fee will result in suspension of the certificate of registration and, ultimately, revocation.

Resignation

Members who are not practising the profession and who do not wish to renew their registration must let the CRTO know of their intent to resign in writing. Under the *Respiratory Therapy Act 1991*, a Member who has resigned or no longer holds a certificate of registration is prohibited from using the title "Respiratory Therapist" (or any variation or abbreviation of that title) and is prohibited from holding themselves out as a person who is qualified to practise as a Respiratory Therapist in Ontario.

If a resigned Member wishes to be reinstated, they must re-apply and meet the registration requirements in place at the time of their re-application.

Suspension (for Failure to Renew Membership)

If a Member fails to renew their registration with the CRTO and does not resign, their certificate of registration will be suspended.

A person whose certificate of registration has been suspended is not permitted to:

- Hold themselves out as a person qualified to practise the profession in Ontario, including using the title "Respiratory Therapist" or any variation or abbreviation of these titles, such as "RT", "RRT".
- Practise as a Respiratory Therapist in Ontario.
- Perform controlled acts under the *Regulated Health Professions Act, 1991* by virtue of being a Member of the CRTO.

In order to have the suspension lifted, the person will be required to meet all annual renewal requirements, including payment of fees as set out in the CRTO By-Laws.

Revocation (for Failure to Renew Membership)

According to the Registration Regulation (s. 66.(2)), if the suspension (for failure to renew registration) is not lifted, the Member's certificate of registration will be revoked by the last day of the CRTO's fiscal year in which the suspension was imposed. Once the certificate has been revoked, a former Member may be reinstated if they:

- (a) re-apply for registration and pay the application fee;
- (b) meet the registration requirements;
- (c) pay the annual fee for the year in which the new certificate is issued.

This Professional Practice Guideline will be updated as new evidence emerges or as practice evolves. Comments on this guideline are welcome and should be addressed to:

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