

Registration and Use of Title

PROFESSIONAL PRACTICE GUIDELINE



Professional Practice Guideline

College of Respiratory Therapists of Ontario (CRTO) publications contain practice parameters and standards which should be considered by all Ontario Respiratory Therapists 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. It is important to note that these CRTO publications may be used by the CRTO or other bodies in determining whether appropriate standards of practice and professional responsibilities have been maintained.

Resources and references are hyperlinked to the Internet for convenience and referenced to encourage exploration of information related to individual areas of practice and/or interests. Bolded terms are defined in the Glossary.

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.

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Introduction

The *Regulated Health Professions Act, 1991* (RHPA) sets out the framework for the regulation of health professions in Ontario. This piece of legislation provides the privilege of self-regulation to the profession of Respiratory Therapy as well as other health care professionals. The *RHPA* also permits each 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 about protected titles and the requirements for CRTO registration in Ontario.

Classes of Registration

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

An unusual feature of the regulatory model created by the *RHPA* is that certificates of registration are issued for life. Certificates of Registration may only be removed by the CRTO for cause, as required by the legislation, or at the request of a Member. As a result, failure to notify the CRTO that a Member has moved out of province, retired, or wishes to resign for any other reason by the annual renewal date could result in a suspension of his/her certificate of registration.

A General Certificate of Registration is issued to an individual who has met all academic requirements and has successfully completed the registration examination or evaluation approved by the CRTO, or met the registration requirements under the *Ontario Labour Mobility Act, 2009*. If a Member holds a General Certificate of Registration, he/she must use the designation RRT and may use “Registered Respiratory Therapist” or “Respiratory Therapist” as his/her professional title.

A Graduate Certificate of Registration is issued to an individual who has met all academic requirements but has not yet successfully completed the registration examination or evaluation approved by the CRTO. If a Member holds a Graduate Certificate of Registration, he/she must use the designation GRT and may use “Graduate Respiratory Therapist” as his/her professional title. This is a temporary class of registration. **A Graduate Certificate of Registration is automatically revoked after 18 months.**

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

Please Note...

It is important that an RRT, GRT and PRT clearly identify themselves by their respective professional title on their name badge and when documenting in the patient/client record.

Terms, Conditions and Limitations on 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’s 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;
5. Not perform authorized act #5 “administering a prescribed substance by inhalation”; and
6. Not perform a tracheostomy tube change for a stoma that is less than 24 hours old.

Table 1: Authorized Acts

Authorized Acts	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.	✗

*please note that general supervision is required.

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

GRTs are not permitted to independently self-initiate oxygen therapy as per authorized act #5 in the RTA. GRTs can still administer oxygen and other substances (e.g., bronchodilators) with a valid order (direct or via a medical directive) from an authorized prescriber (e.g., physician).

Please Note...

In addition to GRTs not being permitted to delegate controlled acts, the CRTO’s position is that GRTs should not accept delegation for 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 already authorized to RTs (listed above). It is therefore in the best interest of patients/clients for graduate members to first focus on developing their competency in core areas of RT practice.

Procedures Below the Dermis & Tracheostomy Tube Changes

Please Note...

The ***Prescribed Procedures regulation (O. Reg. 596/94)*** has recently been amended. **Tracheostomy tube changes** (tracheostomy tube change for an established stoma and tracheostomy tube change for a fresh stoma) were listed in the previous version of this regulation. However, tracheostomy tubes changes (for a stoma greater than 24 hours and less than 24 hours) is now listed in the ***Controlled Acts regulation (O. Reg. 107/96)*** as an exemption under s.14. Please see Table 1 for an overview of which procedure types can be performed under which type of certificate of registration. For additional information, please see the **[CRTO website](#)**.

Table 2: Prescribed Procedures below the Dermis & Tracheostomy Tube Changes

<i>Prescribed Procedures Regulation</i>	RRT	GRT*	PRT**
Basic prescribed procedures.	✓	✓	**
Advanced prescribed procedures.	✓		
<i>Controlled Acts Regulation</i>			
Tracheostomy tubes change for a stoma that is more than 24 hours old.	✓	✓	✓
Tracheostomy tubes change for a stoma that is less than 24 hours old.	✓		

Please Note...

Due to the fact that tracheostomy tube changes are now listed as an exemption in the *Controlled Acts* regulation, Respiratory Therapists (RRTs, GRTs and PRTs) are no longer permitted to delegate tracheostomy tube changes.

* GRTs require general supervision to perform any controlled act and are not permitted to delegate any controlled acts.

** PRTs are only able to perform basic procedures if permitted to do so by the terms and conditions of his/her certificate of registration.

Protected Titles

In Ontario, use of the title “Respiratory Therapist” is granted to **Members** of the CRTO only. This title is protected/restricted under the Restricted Titles section (s.9) of the RTA which states:

Restricted titles

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

Representations of qualification, etc.

9. (2) *No person other than a member shall hold himself or herself out as a person who is qualified to practice in Ontario as a respiratory therapist or in a specialty of respiratory therapy.*

Therefore, only CRTO Members are entitled to use the professional **title** “Respiratory Therapist” in Ontario. The Registration regulation (O. Reg. 596/94 – part VIII) specifies that Members must use the **designation** RRT, GRT or PRT that correspond to their certificates of registration. Job titles may be used, but they must be accompanied by either the full professional title or the proper designation.

Professional title is the full expression of the title.

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 RTs credentials and/or position within their organization.

Table 3: Professional Designations & Professional Titles

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

Use of Title in the Practice of Respiratory Therapy

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** (e.g., J. Smith or John Smith) and either his/her full professional title (e.g., Registered Respiratory Therapist) or professional designation (e.g., RRT). It is also important that Members use the name that they have registered with the CRTO in all interactions with the **public** and the health care team. The name used to register with the CRTO is placed on the Public Register and is the one that would be used if someone needed to find out if the therapist was a Member of the CRTO. 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 him/herself to the patient/client with their name and professional designation” (standard 4.2).

If a Member feels that identifying his/herself by name could put them at risk, they should seek further assistance by contacting the CRTO.

Please Note...

Long before the creation of the *Respiratory Therapy Act (RTA)*, the commonly used title for RTs was **Respiratory Technologist**. This title was changed by the Canadian Society of Respiratory Therapists (CSRT) in 1984 to **Respiratory Therapist**. In Ontario, the title Respiratory Therapist has been formally protected (under the *RTA*) since 1991.

In 1999, the CRTO adopted 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 CRTO Members. However, Members who responded to a survey conducted by the CRTO 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 health care team and the public. As a result, the CRTO 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 titles “Respiratory Technologist” or “Registered Respiratory Care Practitioner” and the designation “RRCP” are not to be used by Members of the CRTO. For the correct professional titles and designation for the various classes of registration, please the table on page 8.

Inactive Certificate of Registration

Please Note...

A Graduate Member cannot apply for an Inactive Certificate of Registration.

A Member registered with a General or Limited Certificate of Registration may apply for an Inactive Certificate of Registration provided he/she is not practising the profession in the broadest sense of that phrase. In the view of the CRTO, the purpose of the Inactive Certificate is to allow non-practising RTs (for example those RTs on parental, sick or educational leave or those practising in other jurisdictions) to maintain their membership with the CRTO so long as they do not:

1. Engage in the practice of respiratory therapy in Ontario,
2. Participate in activities related to their respiratory therapy credentials or experience, or otherwise use their professional status.

Please Note...

An Inactive Member is not permitted to serve as a Council or Non-Council Member of the CRTO.

The following conditions apply to an Inactive Certificate of Registration:

The (Inactive) Member shall not:

- (a) engage in providing direct patient care;
- (b) use his or her professional title or designation;
- (c) supervise the practice of the profession; or
- (d) make any claim or representation to having any competence in the profession

Student Respiratory Therapists (SRT)

Students enrolled in a recognized RT training program are not Members of the CRTO, but the CRTO 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 which may appear on any certificate of registration. These restrictions may be imposed by regulation, (e.g., preventing Inactive Members from engaging in the practice), or by one of the CRTO's statutory committees for cause, such as disciplinary action. The Registration Committee may also place terms, conditions, or limitations on a certificate of registration at the time an application is reviewed. This may include limiting the practice environment or the procedures that may be performed by a Respiratory Therapist in the General, Graduate, or Limited class. The decision to place terms, conditions or limitations on a certificate of registration is made on an individual basis when in the public interest to do so. For example, Members of the CRTO may be required to perform authorized acts under supervision according to terms, conditions and limitations applied on their certificates of registration. For more information on supervision, please refer to the [Supervision Policy](#) posted on the CRTO website.

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

- completing a preset time period;
- 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 specific continuing education or remediation program, or providing acceptable evidence of competence to perform a procedure.

Current terms, conditions, or limitations on a Member's certificate of registration are recorded in the Public Register and available to the public (including employers and other Members of the CRTO) on the CRTO website as part of the Public Register. To view the CRTO's policy on [Terms, Conditions and Limitations](#), please see the CRTO website.

CRTO Register

The CRTO register is the public record of information about each Member. The CRTO is required to make the public register available by posting it on the CRTO's website or making the information available upon request by calling the CRTO office.

The public register includes:

- each Member's **name** and former name(s);
- the Member's registration number;
- the Member's current status of registration;
- the class of certificate of registration held by each Member and the date that the Member's current certificate was issued and the cessation or expiration date;
- the business contact information (name, address and telephone number) of every employer; and if the member is self-employed as a respiratory therapist, the address and telephone number of every location where the member practises other than addresses of individual clients;
- for each practice location the area of practice identified by the member as their "main area of practice";
- the language(s) in which the member is able to provide respiratory therapy services;
- the name, business address and business telephone number of every health profession corporation where the Member is a shareholder;
- the name, business address and business telephone number of every health profession corporation;
- the names of the shareholders of each health profession corporation who are Members of the CRTO;
- terms, conditions and limitations currently in effect on the Member's certificate of registration;
- a notation of:
 - o every matter that has been referred by the Inquires, Complaints and Reports Committee to the Discipline Committee under section 26 of the Code and has not been finally resolved, until the matter is resolved including;
 - a notation of the fact, including the date of the referral;
 - a statement of the purpose of the hearing; and
 - any hearing times, dates for and location of the continuation of the hearing.

- o the results, including a synopsis of the decision, of every disciplinary and incapacity proceeding, unless a panel of the relevant committee makes no finding in regards to the proceeding;
 - o every finding of professional negligence or malpractice which may or may not relate to the Member's suitability to practise, made against the Member, unless the finding is reversed on appeal;
 - o every suspension or revocation of a certificate of registration; and
 - o every suspension or revocation of a certificate of authorization for a professional corporation.
- information that a panel of the Registration, Discipline or Fitness to Practise Committee specifies shall be included;
 - where findings of the Discipline Committee are appealed, a notation that they are under appeal, until the appeal is finally disposed of;
 - where, during or as a result of a proceeding under section 25 of the Code, a Member has resigned and agreed never to practise again in Ontario, a notation of the resignation and agreement;
 - where the Member's certificate of registration is subject to an interim order, a notation of that fact, the nature of the order and the date that the order took effect;
 - where the Member's certificate of registration is subject to a suspension for failure to pay a fee or failure to complete his or her registration renewal, the reason for the suspension and the date of the suspension in addition to the fact of the suspension;
 - if a Member ceased to be a Member, a notation specifying the reason for the cessation of membership and the date upon which the member ceased to be a member;
 - any information jointly agreed to be placed on the register by the CRO and the member;
 - information in respect of a former Member related to discipline proceedings in Ontario shall be entered on the register for a period of fifty years after the termination of Membership.

Please Note...

Participation in the QA Program includes submitting the requested documentation in the required format, as well as completing additional assessments, when necessary.

For more information on the **mandatory reporting obligations**, please see the **CRTO's website**.

Maintaining Registration with the CRTO

Members of the College of Respiratory Therapists of Ontario must renew their Membership on an annual basis by submitting the Registration Renewal and paying the annual renewal fee. In addition, Members of the CRTO are required to:

- Practise according to the standards of practice established in the legislation, regulations and CRTO guidelines;
- Participate in the CRTO Quality Assurance Program, , which includes maintaining the CRTO PORTfolio^{OM} on an ongoing basis, as well as submitting to the CRTO the necessary documentation and/or completing any required assessment, when requested;
- Maintain professional liability insurance in the amounts and coverage set out in the policies of the CRTO;
- Inform the CRTO regarding details of:
 - o any change(s) to the Member's name, home address, employment status or other relevant information;
 - o any finding of guilt against the Member in relation to a one of the following:
 - an offence under the *Criminal Code of Canada*;
 - an offence related to prescribing, compounding, dispensing, selling or administering drugs;
 - an offence that occurred while the Member was practising or that was related to the practice of the Member (other than a municipal by-law infraction or an offence under the *Highway Traffic Act*);
 - an offence in which the Member was impaired or intoxicated; or
 - any other offence relevant to the Member's suitability to practice the profession.
- Members must also report if they have been found to have engaged in professional negligence or malpractice;
- Any finding of professional misconduct, incompetence, incapacity or other similar finding in Ontario in relation to another profession or in another jurisdiction in relation to Respiratory Therapy or another profession that occurs or arises at any time after the holder's certificate is issued;
- Any proceeding for professional misconduct, incompetence, incapacity or other similar proceeding in Ontario in relation to another health profession or in another jurisdiction in relation to Respiratory Therapy or another profession that occurs or arises at any time after the holder's certificate is issued. Notification should take place promptly and, in no case, more than thirty days after the event.

Resignation

Members who do not wish to renew their Membership must let the CRTO know of their intent to resign in writing. Under the *Respiratory Therapy Act*, a Member who has resigned or no longer holds a Certificate of Registration is prohibited from using the title "Respiratory Therapist", and is prohibited from holding himself or herself out as a person who is qualified to practise in Ontario as a Respiratory Therapist. Members who are not practising respiratory therapy but engage in another health care activity (e.g., such as a manager in health care), and whose employer does not require them to be registered with the CRTO, have the option of resigning their Membership. If a Member resigns and wishes at a later point to be reinstated, the Member must apply and meet the registration requirements in place at the time of re-application.

Suspension (for failure to renew membership)

If a Member fails to renew his/her Membership with the CRTO and does not resign, his/her Membership will be suspended.

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

- Hold himself/herself 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* 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)

A certificate of registration suspended for failure to renew registration, will be revoked on the last day of the CRTO's fiscal year in which the suspension was imposed.

According to the Registration Regulation (s. 66.(2)), if the suspension (for failure to renew registration) of a Member's certificate of registration is not lifted by the given deadline, the Registrar will revoke the certificate on that day. Once the certificate has been revoked, a former Member may re-apply if he/she:

- a) satisfies the requirements for the class of certificate which is sought,
- b) pays the application fee,
- c) pays the annual fee for the year in which the new certificate is issued.

Glossary

Member - refers to a Respiratory Therapist (RT) who is registered with the CRTO as either a Registered Respiratory Therapists (RRT), Practical (limited) Respiratory Therapist (PRT) or Graduate Respiratory Therapists (GRT).

Name - includes first name, surname, former names, and pseudonyms.

Public - refers to patients and potential patients and at times can include family members, employers, other health care professionals and Members.

Regulated health care professional - a health care provider who is a member of a regulatory college and is regulated by the RHPA (e.g., nurse, physician, dentist, massage therapist, physiotherapist, dietitian, occupational therapist, etc.).

Notes:



College of Respiratory
Therapists of Ontario

Ordre des thérapeutes
respiratoires de l'Ontario

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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