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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.

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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 grants the privilege of self-regulation to the profession of Respiratory Therapy 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 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 their certificate of registration.

General Certificate of Registration

May be issued to an individual who has met all academic requirements and has successfully completed the registration examination 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, they must use the designation RRT and may use “Registered Respiratory Therapist” or “Respiratory Therapist” as their professional title.

Graduate Certificate of Registration

May be issued to an individual who has met all academic requirements but has not yet successfully completed the registration examination approved by the CRTO. If a Member holds a Graduate Certificate of Registration, they must use the designation GRT and may use “Graduate Respiratory Therapist” as their professional 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;
5. not perform authorized act #5 “administering a prescribed substance by inhalation”; and

Classes of Registration (continued)

- 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.

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).

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.

Classes of Registration (continued)

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 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 professional title.

NOTE:

It is important that RRTs, GRTs and PRTs 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.

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

- engage in providing direct patient care;
- use his or her professional 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:

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

NOTE:

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

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.

Professional Designations, Professional 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 RTs credentials and/or position within their organization.

The Registration Regulation (O. Reg. 596/94) specifies that:

- Members may use the professional title that corresponds to their certificates of registration; for example,
 - o Members registered with General Certificates of Registration may use the “Registered Respiratory Therapist” or “Respiratory Therapist” titles;
 - o Members registered with Graduate Certificates of Registration may use the “Graduate Respiratory Therapists” title; and
 - o Members of the CRTO registered with Limited Certificates of Registration may use the “Practical Respiratory Therapist” title.
- Members must use the designation that corresponds to their certificates of registration. for example,
 - o Members registered with General Certificates of Registration must use the RRT designation;

- o Members registered with Graduate Certificates of Registration must use the GRT designation; and
- o Members of the CRTO registered with Limited Certificates of Registration must use the PRT designation.

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

Table 2: Professional Designations, Professional Titles & Job Titles

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

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 CRTO’s Respiratory Therapists As Anesthesia Assistants Professional Practice Guideline.

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 and their 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 healthcare team. The name used to register with the CRTO is the one that 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 themselves to patients/clients and other members of the healthcare team using their name and professional title” (CRTO [Standards of Practice - Standard 13](#). Professional Responsibilities - Responsibilities to the Profession and the Public).

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:

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 healthcare 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 title “Registered Respiratory Care Practitioner” and the designation “RRCP” is not to be used by Members of the CRTO. For the correct professional titles and designation for the various classes of registration, please see the table on page 9.

Student Respiratory Therapists (SRT)

Students enrolled in a recognized RT training program are not Members of the CROTO, but the CROTO 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 the practice), or by one of the CROTO's statutory committees for cause, 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 CROTO's two-year currency requirement.

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

- completing a pre-set 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 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 CROTO's Register and are available to the public (including employers and other Members of the CROTO). Additional Information on TCLs can be found in the CROTO's [Terms, Conditions and Limitations Policy](#).

CRTO Public Register

The *Regulated Health Professions Act (RHPA)* requires all health regulatory colleges to maintain a register of Member information that is publically available on its website. The CRTO Register includes the information required under the Health Professions Procedural Code (the “Code”), which is a subsection of the *RHPA*, and additional requirements outlined in the CRTO’s By-laws.

Examples of information provided on the online Register include:

- Members’ names and formal names
- Members’ class of registration, registration number, and registration status
- Any conditions or restrictions imposed on Members’ certificates of registration
- Information about a Members’ business address,
- the language(s) in which Members 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 regulators.
- information about health profession corporations:
- Conduct information, for example,
 - o Results of past hearings.
 - o Notations of pending hearings, for example, when a Member has been referred for a hearing before CRTOs Discipline or Fitness to Practise Committee.
 - o Notations regarding when a Member has been required to appear before a panel of CRTO’s Inquiries, Complaints and Reports Committee for a caution.
 - o Notations regarding when a Member is required to complete a Specified Continuing Education and Remediation Program (SCERP).
 - o Convictions, if for example, a Member has been convicted of an offense under the Criminal Code (Canada) and other similar Codes.
 - o Criminal charges or other similar charges, until such time as they have been dismissed, withdrawn, or a conviction occurs.
 - o Restrictions imposed by a court, for example, bail conditions.


The Register also includes information about former Members of the CRTO. This includes notations specifying that a Member ceased to be registered with 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 CRTO Register By-law.

Maintaining Registration with the CROTO

Members of the College of Respiratory Therapists of Ontario 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 of the CROTO are required to:

- Practise according to the standards of practice established in the legislation, regulations and CROTO guidelines;
- Participate in the CROTO Professional Development Program;
- Maintain Professional Liability Insurance (PLI)* in the amounts and coverage set out in the policies of the CROTO;
- Inform the CROTO 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 CROTO By-Law. For example,
 - o Information related to charges and/or findings of guilt related to offenses,
 - o Findings/proceedings of professional negligence or malpractice,
 - o Findings/proceedings of professional misconduct, incompetence, incapacity, or other similar finding by another professional regulatory/licensing authority in any jurisdiction.



* for additional information on [Professional Liability Insurance](#), please review the CROTO's Professional Liability Insurance Policy.

Additional Information...

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

Resignation

Members 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", and is prohibited from holding themselves out as a person who is qualified to practise as a Respiratory Therapist in Ontario. Members who are not practicing respiratory therapy but engage in another healthcare activity (e.g., such as a manager in healthcare), 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 their Registration with the CRTO and does not resign, their 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 CRTOs 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; for registration;
- (b) meet the registration requirements;
- (c) pay the annual fee for the year in which the new certificate is issued.

Notes:



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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