# Inactive Certificate of Registration



#### Overview

An Inactive Certificate of Registration permits General or Limited Certificate holders (RRTs and PRTs) who are not currently practicing in Ontario to maintain their registration with the CRTO. For example, RRTs on parental, sick or educational leave or those practicing outside of Ontario often choose to apply for an Inactive Certificate of Registration. It is important to note that an Inactive Certificate of Registration does not apply to Graduate Members of the CRTO.

## Inactive Certificate Conditions and Registration Requirements

Under the *Registration Regulation* (O. Reg. 596/94, Part VIII), a Member registered with an Inactive Certificate of Registration shall not:

- a. Engage in providing direct patient care
- b. Use their professional Respiratory Therapist title or designation
- c. Supervise the practice of the profession; or
- d. Make any claim or representation of having any competence in the profession.

Inactive Members are required to comply with all other requirements imposed on CRTO Members, for example:

- Annual renewal of registration
- Duty to report offences, findings, and other information to the Registrar
- Participate in the Professional Development Program
- Participate in any professional conduct matters/requirements.

## Reinstatement: How to Return to Active Registration

The CRTO is responsible for setting the RT entry-to-practice requirements in the province of Ontario in the public interest. To ensure that Members uphold the minimum level of current practice, the CRTO places specific requirements on Inactive Members applying for reinstatement to a General or Limited certificate of registration.



According to the *Registration Regulation* (s. 62 (2)), a Member who holds an Inactive Certificate of Registration may be reissued a General or Limited certificate of registration if the Member:

- (a) Applies in writing to the Registrar for reinstatement;
- (b) Pays the annual fee for the certificate they are applying for, along with any outstanding fees, penalties, or amounts owed to the CRTO; and
- (c) Satisfies a panel of the Registration Committee that their RT knowledge, skills and judgement are current.

To start the reinstatement process, and before resuming practice, Inactive Members are required to complete and submit the <u>Application for Reinstatement Form</u> together with the applicable registration fee (see the Registration Fees section below). It is recommended that Members submit their applications for reinstatement at least eight (8) weeks before their employment start date.

### **Currency Requirements**

Inactive Members who have practiced for at least 1,125 hours within three years before their application for reinstatement will generally satisfy the currency requirement unless the CRTO is aware of information that could reasonably indicate a concern with respect to their knowledge, skills and/or judgment. Inactive Members who don't meet the currency requirement will be referred to the Registration Committee for consideration (see below).

### Referral to the Registration Committee

Inactive Members who have not practiced for at least 1,125 hours in the three years before their application for reinstatement will be referred to the Registration Committee for consideration. When reviewing an application for reinstatement, a panel of the Registration Committee will refer to the <u>Applications for Registration or Reinstatement - Currency Requirement Policy.</u>

An Inactive Member referred to the Registration Committee will receive a notice of the referral and will have thirty (30) days to provide additional information.

Applications for reinstatement are considered on a case-by-case basis. When reviewing an application for reinstatement, the Panel will consider several factors, which may include:

- 1. Time since last practice
- 2. Nature and intensity of last practice
- 3. Quality and quantity of efforts to maintain currency while not practicing
- 4. The applicant's re-entry plan; and
- 5. Any other information relevant to the applicant's knowledge, skills and/or judgment.

Following the review, the Panel may, for example:

- Direct that a General or Limited Certificate of Registration be issued (e.g., the Member provided satisfactory proof of refresher/retraining);
- Direct that specific terms, conditions and limitations be imposed on the General or Limited Certificate of Registration;
- Require the Member to complete a refresher/retraining program before reinstatement;
- Upon reinstatement, the Member may be directed to a panel of the Quality Assurance Committee with a recommendation for an assessment of their knowledge, skills and judgement (utilizing the Launch RT Jurisprudence Assessment) within three (3) months of reinstatement.

## Conduct/Health-Related Related Issues

If an issue concerning a Member's conduct, competence or health arises while they are in the Inactive Class, the CRTO may initiate professional conduct follow-up, and the Member will be obligated to participate in the professional conduct process.

If an issue concerning a Member's conduct, competence or health arose before they joined the Inactive Class, the professional conduct process will continue while they are in the Inactive Class, and the Member will be obligated to participate fully in the process.

If an Inactive Member applies for reinstatement while a professional conduct matter is ongoing, the CRTO will assess the ongoing professional conduct matter and how it relates to the Member's ability to practice the profession with appropriate knowledge, skill, and judgment. This assessment will determine if it is acceptable to proceed with the reinstatement request. This may delay the reinstatement process.



#### **Unauthorized Practice**

An Inactive Member is not authorized to resume practice until their reinstatement application has been approved by the CRTO. If the Inactive Member resumes practice before reinstatement, they may be referred to the Inquiries, Complaints and Reports Committee (ICRC) for allegations of professional misconduct and may be prosecuted in court for unauthorized practise/holding out as an RT.

### How to Apply for an Inactive Certificate

An applicant for an Inactive Certificate of Registration must meet the following requirements:

- 1. The applicant must be a Member who holds a General or Limited Certificate of Registration
- 2. The applicant must complete and submit the Application for an Inactive Certificate Form
- 3. The applicant must pay any outstanding fees, including any annual fee owing for the current membership, penalties or other amounts owed to the CRTO.

### Partial Refund of Annual Registration Fee

Members who change their registration to Inactive during the registration year may be eligible for a partial refund of their annual registration fee. For example, Members who paid a \$700.00 annual registration fee and are changing to Inactive:

- between March 1 and May 31 may be eligible for a \$525 refund
- between June 1 and August 31 may be eligible for a \$350 refund
- between September 1 and November 30 may be eligible for a \$175 refund
- between December 1 and February 28/9 are not eligible for a refund.

### Registration Fees: Inactive Member Resuming Active Membership

The fee to reinstate from Inactive to General or Limited Certificate of Registration is prorated quarterly. For example, if a Member renewed their membership with the inactive fee of \$125, their reinstatement fee will be prorated as follows:

- \$575: March 1 May 31
- \$400: June August
- \$225: September November
- \$50: December February



For more information regarding fees, please visit the CRTO's Schedule of Fees webpage.

As a reminder, Members must wait for confirmation that their application for reinstatement has been processed before resuming active practice.

#### Resources

- Am I Practising?
- Schedule of Fees
- Application for Inactive Certificate of Registration
- Application for Reinstatement
- Applications for Registration or Reinstatement Currency Requirement Policy

#### **Contact Information**

College of Respiratory Therapists of Ontario <a href="https://www.crto.on.ca">www.crto.on.ca</a>

**Telephone:** 416-591-7800

Toll-Free (in Ontario): 1-800-261-0528

Registration Email: registrationservices@crto.on.ca

#### Q & As

## Question: Can I apply for the Inactive Certificate if I change careers and am practicing outside of Respiratory Therapy?

Answer: Some Members may consider an Inactive Membership because of a career change. This tends to be a more complicated decision because the Respiratory Therapy scope of practise is so broad. When considering whether to apply for an Inactive Certificate, you should review the following:

- The conditions that will be imposed on your Inactive certificate;
- The length of time you are likely to be Inactive (see currency requirements section); and
- Does the new role require you to use the knowledge, skills, and judgment that you have acquired as an RT?

For example, many RTs move into management roles. If you become the manager of a Respiratory Therapy department, it would be difficult to argue that you are not using the knowledge acquired as an RT, and so, you would be required to remain "Active". If you become the manager of a logistics department, it is less likely that you will use your RT knowledge and so the Inactive registration would likely be appropriate.

It is even more difficult to make that call when the new role overlaps with the Respiratory Therapy scope of practice. For example, if you are working in a Pulmonary Function Test (PFT) Lab beside non-RTs, even if your role is the same, it would be difficult to argue that you will not be applying your RT knowledge. You have trained as an RT and as such have a broader degree of knowledge than a non-RT PFT technician. You cannot simply "turn off" that knowledge and, since PFT falls under the scope of Respiratory Therapy, you should remain registered in the General or Limited Class of Registration.

A similar argument applies to anyone working in an area that requires additional training and education. Infection Prevention and Control is a good example of this. A Respiratory Therapist likely practicing in Infection Prevention and Control will continue to use their RT-specific knowledge and should remain registered in the General or Limited Class of Registration.

When considering whether to apply for an Inactive Certificate, you should review the conditions that will be imposed on your certificate and the specific requirements of the role you are pursuing. Contact the CRTO if you have any questions or are unsure if you would qualify for the Inactive Certificate.

## Question: I will be going on maternity leave in the middle of April; am I required to pay the full registration fee of \$700 for the year, or should I become inactive for the year?

Answer: Because your maternity leave will begin in April (and you will be working as a Respiratory Therapist in March), you cannot renew as an Inactive Member on March 1; you will therefore need to pay the full \$700.00 registration fee and renew as a General Member. However, you may apply for the Inactive certificate at the start of your maternity leave. At that time, you may be eligible for a partial refund of your annual registration fee. For example, if your Inactive Certificate is issued in April, you may be eligible for a \$525 refund.

## Question: I will be on academic leave of absence for a year; will it affect my CRTO registration status?

Answer: When you are on a leave of absence, you may either change your registration to Inactive or maintain your General/Limited registration. A change in your employment status does not change your CRTO registration status.

#### Question: I am retired but want to maintain my CRTO registration. Is this possible?

Answer: Yes, you may maintain your current registration even if you are no longer practising. You may also choose to apply for the Inactive Certificate of Registration. As an Inactive Member, you will continue to receive CRTO communications, as such, you are required to update your contact information with the CRTO if there are any changes. Inactive Members are also required to renew their registration, maintain their Professional PORTfolio and update their contact information with the CRTO.

## Question: I am moving to another province. Do I have to change my status to Inactive or resign my certificate of registration?

Answer: If you are moving to another province, you may consider one of the following:

- Resigning your registration (see the Resignation form).
- Applying for an Inactive Certificate (see the Application for Inactive Certificate form); or
- Maintain your current certificate of registration with the CRTO.

When making your decision, consider whether you are planning to return to Ontario and if so when. Resigning your registration may be an option if you are not planning to return to



Ontario for several years. However, if you are moving to another province for a short period, changing your registration to Inactive may be a more suitable option.

## Question: I am working for the XYZ Lab doing blood gases. Could I change my registration to Inactive?

Answer: The *Registration Regulation* specifies that an Inactive Member cannot provide direct patient care within the scope of practice of the profession (in Ontario). Accordingly, if you are working in blood gases (which is part of the scope of practice of Respiratory Therapy, and is considered part of direct patient care), you should most likely remain registered in the General Class of Registration.

## Question: I am an unemployed Graduate Member of the CRTO. Can I change my status to Inactive?

Answer: No. The Inactive Certificates of Registration do not apply to Graduate Members of the CRTO. Only Members in the General or Limited Classes of Registration may apply for an Inactive Certificate.

#### Question: Can I maintain my Inactive Registration for more than one year?

Answer: Yes. Members may maintain Inactive registration indefinitely. However, if you remain inactive for an extended amount of time (see Currency Section above), you may be required to provide evidence to show that your knowledge and skills are current before your application for reinstatement can be approved. Some applicants may be required to practise under supervision, take refresher courses or similar activities to regain that currency.