

**Submission to the Honorable David Caplan,
Minister of Health and Long-Term Care
January 2009**



Use of the Title “Doctor”

INTRODUCTION

The College of Physicians and Surgeons of Ontario (CPSO) welcomes the opportunity to offer the Minister of Health and Long-Term Care our comments and advice in response to HPRAC’s consultation on the use of the title “Doctor” in traditional Chinese medicine (TCM) and more generally.

The following submission pertains to issues raised in two reports prepared by HPRAC:

- 1) *Regulation of Health Professions in Ontario: New Directions – A Report to the Minister of Health and Long-Term Care on Regulatory Issues and Matters Respecting the Use of the “Doctor Title” in Traditional Chinese Medicine* (September 2006)
- 2) *Regulation of Health Professions in Ontario: New Directions – A Report to the Minister of Health and Long-Term Care on Regulatory Issues and Matters Respecting Health Care Practitioners, Patients and Clients* (April 2006)

GENERAL COMMENTS ABOUT THE REVIEW PROCESS

- When viewed in isolation, the use of the title “Doctor” is a fairly circumscribed issue. However, this consultation is part of a much broader consultation of considerable magnitude with far-reaching implications for Ontario’s overall health care system. When viewed in light of the broader consultation, the CPSO feels that the tight deadline for providing feedback to the Ministry did not allow sufficient time to prepare a considered response.

GENERAL COMMENTS ABOUT THE PROPOSAL

- In general, the CPSO is concerned that the lack of consistent requirements for professionals who use the title “Doctor” could lead to confusion among the public.

Use of the Title “Doctor” in Traditional Chinese Medicine

- With respect to use of the title “Doctor” among practitioners of TCM, we echo HPRAC’s concern that other professionals who use the title “Doctor” require a minimum of seven years post-secondary education, including some university prerequisites for entry into a professional school or program.

- TCM practitioners who use the title “Doctor” should be subject to a rigorous educational and accreditation process to ensure that the use of the title is consistent with other professionals who undergo extensive training.

Use of the Title “Doctor” More Generally

- HPRAC recommends that individuals in possession of a doctorate degree be permitted to use the title “Doctor” provided that the title and the nature of the degree and the discipline in which the doctorate is held is clearly identified. The CPSO does not agree with this, as it may confuse the public. It also puts an onus on the public to understand the distinctions between various health care disciplines.
- Some professionals with a doctorate degree work in health care settings in roles that support the broader ambit of delivering health care, but do not themselves directly deliver health care, nor are they qualified to do so. Such professionals include social workers, chaplains, ethicists, legal counsel and administrators. Within a healthcare setting, the public typically associates the title “Doctor” with those who provide medical treatment and advice. Identifying non-physician doctorates by the title “Doctor” may lead to misconceptions from the public that such individuals, when working in a health care setting, are able to offer medical treatment and advice.
- The CPSO disagrees with HPRAC that the question of who should be permitted to use the title “Doctor” is a social matter rather than a health related matter. Given the wide diversity of regulated health professions in Ontario and the sometimes blurred roles between them, as well as the overall changing nature of health care delivery in this province, clear guidelines on use of the title “Doctor” would help protect the public.

RECOMMENDATIONS

- The CPSO urges the Minister not to accept HPRAC’s recommendation that holders of a doctorate degree be permitted to use the title “Doctor” provided that the title and the nature of the degree and the discipline in which the doctorate is held is clearly identified.
- The government should enforce provisions in the *Regulated Health Professions Act* pertaining to the use of the title “Doctor”.
- There should be a clear communication plan explaining to the public the differences between the various professions who use the title “Doctor”.
- There should be a thorough and rigorous vetting process for the development of new regulations on use of the title “Doctor”. Appropriate stakeholder consultation should take place before any new regulations are passed.