Controlled acts: performing, exceptions and delegation

CRPO's Standard 1.4: when RPs may perform a controlled act, the controlled act of psychotherapy, the RHPA's exceptions (students, counselling, Indigenous healers), receiving a delegation, and never delegating psychotherapy.

Study aid, not legal advice. Last verified against the official sources linked below on 11 November 2026.

1 Standard 1.4

1. Do not perform a controlled act **unless** you are authorized, a legal exception or exemption applies, or you receive appropriate delegation (1.4.1).
2. RPs are authorized to perform the controlled act of psychotherapy, provided they have the **competence** to do it safely and effectively (1.4.2, Standard 2.1).
3. RPs **never delegate** the controlled act of psychotherapy (1.4.3).

2 The controlled act of psychotherapy

- It needs **all five** elements: treating, by psychotherapy technique, through a therapeutic relationship, a serious disorder of thought, cognition, mood, emotional regulation, perception or memory, that may seriously impair judgement, insight, behaviour, communication or social functioning (RHPA s. 27 (2)).
- **Five other professions** may also perform it: nurses, occupational therapists, physicians, psychologists and psychological associates, social workers and social service workers.

3 The RHPA's exceptions (s. 29)

- First aid or temporary assistance in an **emergency** (s. 29 (1) (a)).
- **Students** meeting the requirements to register, under supervision: CRPO's version is clinical supervision by a qualified RP for the controlled act (s. 29 (1) (b)).
- Treating by **prayer** or spiritual means under the tenets of the giver's religion (s. 29 (1) (c)).
- Treating a **household** member or helping with daily living covers only certain other acts, not psychotherapy (s. 29 (1) (d), (e)).
- A communication in **counselling** about emotional, social, educational or spiritual matters, unless it is one a profession's Act authorizes (s. 29 (2)).

4 Indigenous healers

- The RHPA **does not apply** to Indigenous healers providing traditional healing services to Indigenous persons or members of an Indigenous community (s. 35 (1) (a)).
- A healer who is a **member of a College** remains subject to it (s. 35 (2)).

5 Receiving a delegation

- Only if the delegating professional works within their scope and standards and will **take responsibility** for your actions.
- Only if it would not violate therapist-client **boundaries**.
- Only if you can carry it out in a **safe and effective** way.
- A separate exemption lets competent RPs perform **acupuncture** in an addiction treatment program within a health facility (CRPO).

6 Meeting the standard

- [ ] Decline a controlled act that is **beyond your competence** or, in your judgement, counter-therapeutic.
- [ ] Decline a delegation if the delegating professional is **not supervising** or will not take responsibility for preparing you.

Psychotherapy is a controlled act you may perform when competent, never delegate, and only receive others' acts by proper delegation.

Official sources: CRPO Standard 1.4, Controlled Acts and RHPA, 1991, ss. 27, 29, 35. Condensed from Professional Conduct. Independent study aid, not legal advice, not affiliated with CRPO or COMPASS.