

# MILLS | GOSSE

P S Y C H O L O G Y

PSYCHOLOGICAL, COUNSELLING, ASSESSMENT, EDUCATIONAL, & VOCATIONAL SERVICES

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## Office Policy on Supervision and Releasing Notes & Records

Mills Gosse Psychology's clinical staff are under direct and ongoing supervision by members of the College of Psychologists of Ontario at all times. Supervisees can consult with Dr. Mills, C.Psych, ABPP or Clinical Manager Scott Gosse, MA, C.Psych at any time, whether this is by phone, in person, by Skype, or email, ad hoc or in emergencies, and during regularly scheduled supervision appointments with clinical staff who meet with us independently or in our weekly and monthly scheduled supervision groups. Therapists' and counsellors' caseloads are monitored on a weekly basis for case management and quality assurance.

In accordance with the College of Psychologists of Ontario's (CPO), *Standards of Professional Conduct* (2017), Mills Gosse Psychology does not release notes and records on supervision or about the supervision of supervisees due to confidentiality surrounding the supervision process and privacy of the supervisee.

According to the guidelines, par. 4.1.1. (3):

*"Supervision records are meant to record the interaction between the supervisor and supervisee and focus on the supervisor's evaluation, direction and support of the supervisee as well as the supervisee's response to the input of the supervisor."*

Because the purpose and focus of supervision is on the professional development of the supervisee, all records on the process remain confidential and are not part of any client's clinical file. As a result, the notes and records on a supervisee's disclosures in supervision are not subject to release or inspection by third parties requesting such documentation.

## Insurer and Lawyer Requests for Supervision Records

All requests for such records from third parties are illegitimate and will be denied due to (a) the confidentiality of the supervisee, (b) the integrity of the supervision process, and (c) due to the fact that they are not part of any client's records. We view these requests as a violation of the principles of *PIPEDA* with respect to limiting collection, use, and disclosure of private information concerning the Supervisee. While the indiscriminate nature of these requests makes them particularly unwarranted, in no circumstances are these requests "reasonable" or necessary under the *Insurance Act* in order to determine any liability for a claim.

## MVA Requests for Supervision Records & Requests for Statuary Declarations by Supervisees

Because such records are not part of any client's file, nor is the supervisory focus about a client, but rather the supervisee's professional conduct and development, such requests by insurers to determine their liability for a claim are illegitimate.

Equally, requests from insurers that demand supervisees fill out and sign Statutory Declarations are not mandated under the SABS and are not deemed necessary to determine their liability for a claim. Refusal to pay for preapproved assessment or treatment plans due to failure to fill out such statutory declaration requests is in direct violation of the SABS and the *Standards for Professional Conduct* (2017).

Furthermore, **no supervisee** (i.e., a therapist who is not a member of the College of Psychologists) is **permitted to sign any document** alone when under the supervision of a member of the CPO according to paragraph 4.1.3. (a) of the *Standards*, where it states: “*the supervising member must co-sign all psychological reports and formal correspondence related to psychological services provided by nonmember supervisees.*”

Furthermore, it should be reiterated that the supervision of non-member clinicians, who provide psychological services under the direct supervision of members of the College of Psychologists is a completely legitimate and widely accepted practice in the field of clinical psychology, and is explicitly permitted by the licensing body in Ontario. Thus, any implication by third parties that such practices breach any standards of acceptable practice, or that the denial of services to clients could somehow be justified because a client is being treated under such arrangements, is certainly not valid. As the *Standards* make clear in Section 4.1:

*“If a member is supervising psychological services provided by a member holding a certificate for supervised practice or any other unregulated or regulated service provider who is not an autonomous practice member of the College, **the client is considered to be the client of the supervisor.**”*

*“Members must assume responsibility and accountability for, and review, the actions and services of all supervised providers of psychological services who are not authorized by the College to provide those services autonomously.”*

Based on the *Standards of Conduct*, it should remain clear that all patients of Mills Gosse Psychology are patients of Dr. Mills himself, and supervisees cannot be seen as solely responsible for services provided, and cannot bill services directly, nor can they sign any forms or reports independently. For third party insurers to demand that non-members of the CPO under supervision with a psychologist sign a statutory declaration as a service provider is a **breach of ethics** as established by the CPO. Furthermore, to refuse to pay for preapproved psychological services conducted under supervision on the grounds that the psychologist is not the treating professional is to deny the CPO’s legislative authority and insistence that all patients under supervised treatment are patients of the psychologist, hence subject to the fees for psychologists (not psychotherapists) established by the SABS.