

## Use of Protected Title

Prepared October 2021

### *Background*

Alberta's [Health Professions Act](#) (HPA) includes sections which pertain to title protection as a means of ensuring no person or group of persons may imply or represent themselves as a regulated/registered health professional without being registered with a regulatory body. The protected titles which can be used by registered OTs in Alberta are outlined in Schedule 15 of the HPA and the [Occupational Therapists Profession Regulation](#) (OTPR). Occupational therapists registered with the Alberta College of Occupational Therapists (ACOT) are required to be aware of and adhere to provincial legislation regarding the use of the protected title.

### *Applicability of this Guideline*

This guideline has been prepared for occupational therapists who are **registered** with the ACOT on the **General or Provisional Registers**. There is also content relevant to students of approved occupational therapy programs who are undertaking fieldwork placements in Alberta.

### *Use of Protected Title Requirements*

Use of protected title requirements can be found in the following pieces of legislation. Refer to the legislation for the specific content in each of the relevant parts/sections. The content has also been summarized in the [Appendix](#) of this guideline.

Name of Legislation	Relevant Part(s)/Section(s)
<ul style="list-style-type: none"> <li>• <i>Health Professions Act</i> (HPA)               <ul style="list-style-type: none"> <li>○ Schedule 15 of the HPA</li> </ul> </li> </ul>	Part 7 Sections 128 (1), 128 (3), 128 (5), 128 (5.1); 128.1; 129 and Part 8 Section 131(1) (k), (l)
<ul style="list-style-type: none"> <li>• <i>Occupational Therapists Profession Regulation (OTPR)</i></li> </ul>	Section 22 (1), (2) and (3)

The protected titles OTs registered to practice in Alberta are permitted to use include:

- registered occupational therapist;
- occupational therapist;
- O.T.
- provisional occupational therapist;

**NOTE:** Although the HPA and OTPR use lower case and specific punctuation, Section 128.1 of the HPA permits a regulatory body to authorize alternate abbreviations, initials and punctuation. Examples of acceptable variations of protected title can be found on the following page.

## Overview

- Only individuals who hold an active permit with ACOT may use the protected title.
  - A person who contravenes this legislation is guilty of the offence of practicing without a license and is subject to fines (HPA section 129).
- Registered members of ACOT are to use the protected title to clearly identify themselves to clients, other healthcare providers and the public. Below are some examples of how you can clearly identify your title:

First/Last Name, OT or O.T. or Occupational Therapist

First/Last Name, Registered OT or Provisional OT

First/Last Name, Reg. OT (AB) or Provisional OT (AB)

**NOTE:** *The inclusion of a provincial identifier is particularly relevant to OTs who are practicing across provincial/territorial jurisdictions. It may also be adopted by OTs practicing within Alberta. For more information, see: [Practice FAQs: Practice Across Jurisdictions](#) and [Practice FAQs: Representing Title and Credentials](#) accessed from the [Practice Resources](#) page of the ACOT website – scroll to the Practice Guidance section.*

- Under the supervision of a registered occupational therapist, students who are enrolled in an accredited post-secondary OT program may use the designation of student to clearly identify themselves. Any of the examples below are acceptable (refer also to the requirements outlined by your training program/your preceptor's employer):

First/Last Name, Occupational Therapy Student

First/Last Name, Student OT

First/Last Name, OT Student

*Students may also wish to include the name of their institution after their title*

- Individuals completing re-entry to practice under the supervision of a registered occupational therapist, are to use **Provisional OT** or **Provisional Occupational Therapist**.
- A regulated member who holds a doctorate degree in occupational therapy requires approval of Council *prior* to using the title “**Doctor**” and the abbreviation “**Dr.**”
- OTs registered on ACOT’s Courtesy Register are to use the protected title legislated in their primary province of registration (along with indication of the province of registration if it is not already part of your protected title). They may add **Courtesy Register (AB)** after their title.

First/Last Name, O.T. Reg. (Sask), Courtesy Register (AB)

- There are no requirements outlined in the HPA or OTPR regarding how to represent your academic credentials (your qualifying OT degree or other post-graduate degrees or certificates).
  - See the [Practice FAQs: Representing Title and Credentials](#) for information and examples of how to include your protected title, credentials and/or position description/employment role. This and other practice guidance documents can be accessed from the [Practice Resources](#) page of the ACOT website.

## Appendix – Relevant Protected Title Content from the HPA and OTPR

### A. Health Professions Act (HPA) (Part 7 and 8)

#### Section 128 Title Protection, Protected words, abbreviations

- 128(1) *No person or group of persons shall represent or imply that the person is a regulated member or that the group of persons consists of regulated members unless the person is a regulated member or the group of persons consists of regulated members.*
- 128(3) *No regulated member shall use the word “registered” in a manner that states or implies that the member is a regulated member of a regulated profession except in accordance with the regulations.*
- 128(5) *No person other than (b) a student who is enrolled in a program that in the opinion of the registrar is a program to train persons to provide professional services shall use a title, abbreviation or initials set out in section 2 of a schedule to this Act in combination with the word “student” while undertaking activities related to the program.*
- 128(5.1) *Despite subsections (1), (3), (5) and (10), a student described in subsection (5)(b) shall not use the title “regulated” or “registered” or the initial “R” in combination with the word “student” while undertaking activities related to a program described in subsection (5)(b).*

#### Section 128.1 Title Protection: Use of alternative punctuation in an abbreviation or initials

- 128.1 *In respect of an abbreviation of initials set out in section 2 of a schedule to this Act, a college may authorize regulated members to use the abbreviation or initials to use punctuation that differs from that set out in the schedule.*

#### Section 129 Title Protection: Penalty

- 129 *A person who contravenes section 128 is guilty of an offence and liable (a) for a first offence, to a fine of not more than \$2000, (b) for a 2<sup>nd</sup> offence, to a fine of not more than \$4000, and (c) for a 3<sup>rd</sup> and every subsequent offence, to a fine of not more than \$6000 or to imprisonment for a term of not more than 6 months or to both fine and imprisonment.*

#### Section 131 Regulations Bylaws, Codes of Ethics and Standards of Practice Council Regulations

- 131(1) *A council may make regulations (k) Respecting the use of abbreviations, initials and titles within the meaning of the schedules to this Act and the use of the words “specialist”, “registered”, and “regulated” and the phrase “regulated health professional” by a regulated member or a category of regulated members; (l) respecting the use of and authorizing the use of the titles “doctor”, “surgeon”, “pathologist” and “oncologist” and the abbreviation “Dr.”*

### B. Schedule 15, Profession of Occupational Therapists in HPA

#### Section 2 Use of titles, etc.

- (2) *A regulated member of the Alberta College of Occupational Therapists may, as authorized by the regulations, use any of the following titles, abbreviations and initials: (a) registered occupational therapist;*

- (b) occupational therapist;*
- (b.1). provisional occupational therapist;*
- (c) O.T.*

C. [Occupational Therapists Profession Regulation](#) (OTPR)

Section 22 Titles and initials

- 22(1) *A regulated member on the general register or on the courtesy register may use the following titles and initials:  
(a) registered occupational therapist;  
(b) occupational therapist;  
(c) O.T.*
- 22(2) *A regulated member registered on the provisional register may use the title “provisional occupational therapist”.*
- 22(3) *A regulated member who holds a doctorate degree in occupational therapy from a program approved by the Council may use the title “Doctor” and the abbreviation “Dr.” alone or in combination with other words in connection with providing a health service within the practice of occupational therapy.*