

## Answers to Frequently Asked Questions About: *Registration Requirements for Practice Across Jurisdictions*

Prepared October 2021

Updated July 2024

### Background

This Frequently Asked Questions (FAQ) document features answers to questions regarding registration requirements when providing occupational therapy services virtually to clients located beyond the Alberta border. It also includes answers to questions from occupational therapists from other provinces, territories and countries regarding ACOT registration requirements when providing occupational therapy services virtually or in-person within Alberta.

The [Memorandum of Understanding \(MOU\) on Cross-Jurisdictional Remote Practice](#) (Remote Practice MOU), which was initiated by the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) has been implemented by the Canadian occupational therapy regulators whose legislation permits them to do so. This includes the regulatory organizations in Alberta, Saskatchewan, Manitoba, Ontario, Quebec, New Brunswick, Newfoundland and Labrador, Nova Scotia and Prince Edward Island. British Columbia is not able to sign the Remote Practice MOU currently.

**NOTE:** *Please also refer to ACOT's [Considerations for Virtual Practice](#) guideline.*

The list of questions in this Practice FAQs is not exhaustive and will be updated as unique questions are asked or when Remote Practice MOU signatories change. Please contact ACOT with any questions - [info@acot.ca](mailto:info@acot.ca). The FAQs are organized into four sections: A. Practice Within Canada, B. Practice Outside of Canada, C. Important Considerations, and D. Cross Jurisdiction Registration Requirements Decision Tree.

- A. [Practice Within Canada](#) - Alberta occupational therapists practicing in other provinces/territories; occupational therapists from other provinces/territories practicing in Alberta, either virtually or in-person.
- B. [Practice Outside of Canada](#) - Alberta occupational therapists practicing in other states/countries; occupational therapists from other states/countries practicing in Alberta, either virtually or in-person.
- C. [Important Considerations](#) – Additional items and principles to be aware of.
- D. [Cross Jurisdiction Registration Requirements Decision Tree](#) - Use this to help you determine if/where registration is required depending on where you and/or your client are physically situated at the time of service delivery.

## Questions and Answers

### A. Practice Within Canada

1. I am an occupational therapist registered with ACOT and I (or my employer or contracting organization) am looking to expand my client base across the country – what does the Remote Practice MOU mean for me?

You are responsible for confirming the registration requirements for each jurisdiction you will be providing occupational therapy services to and/or from before proceeding with remote service provision.

Whether you need to be registered in another province depends on where you are expanding your services to and what type of services you are delivering. For convenience, see the bullets below for the registration requirements for the northern territories and each of the Canadian provinces based on the Remote Practice MOU.

**NOTE:** *As these requirements are subject to change, it is always best to confirm with the applicable regulatory bodies ahead of time. Links to the websites of each of the Canadian occupational therapy regulator websites can be accessed from <https://www.acotro-acore.org/links>.*

- YT, NWT, NU – The three territories do not have occupational therapy regulatory bodies so your registration with ACOT or another province will suffice.
- MB, ON, NB, NL, NS, PEI – ACOT registration may suffice. Some colleges may require registration or other requirements if you are providing a restricted activity or a reserved/controlled act.
  - For example, Ontario has specific supervision requirements for occupational therapists who perform psychotherapy. [Click here](#) for the College of Occupational Therapists of Ontario's (COTO) standard for psychotherapy.
- SK – requires an extended access membership to provide virtual services to clients physically situated in SK. [Click here](#) for information on licensing and membership requirements for the Saskatchewan College of Occupational Therapists (SCOT).
- QC – requires a special authorization to provide virtual services of restricted activities. [Click here](#) to make a registration inquiry with the Ordre des ergothérapeutes du Québec (OEQ).
- BC – is not able to sign the MOU currently. Temporary registration will be required to work with clients physically situated in BC whether you are providing services virtually or in-person. [Click here](#) for registration information with the College of Health and Care Professional of BC (CHCPBC).

2. I'm registered to practice in another province and am looking to offer occupational therapy services in Alberta – do I have to be registered with ACOT?

That depends on where you are registered, the services you intend to provide and where you are located at the time of service delivery. **Registration in Alberta is still required if you are**

- Providing restricted activities from another province or territory virtually to clients physically located in Alberta – see the answers to questions 4 and 5 for a more detailed explanation of this requirement;
  - Registered in any province and are teaching or providing supervision in-person to occupational therapists registered to practice in Alberta – see the answer to question 7 for a more detailed explanation of this requirement;
  - Registered in any province (including BC) but are physically located in Alberta when planning to deliver occupational therapy services (even if you are only present in Alberta temporarily) to clients who are physically located in Alberta;
  - Registered in BC and are providing virtual services to Albertans (because BC is not able to sign the MOU); or
  - An international occupational therapist providing services virtually to Albertans from any US state or another country. This requires completion of the Substantial Equivalency Assessment System (SEAS) process prior to applying for registration with ACOT. See the [Internationally Educated Occupational Therapists \(IEOT\)](#) section of the ACOT website for more information.
3. I practice solely within one or more of the three northern territories and am not registered to practice in another province. Do I have to register in Alberta if my client moves or is on vacation in Alberta, or if I am providing teaching or supervision virtually to ACOT registrants or Alberta-based occupational therapy students?

Yes, regardless of the type of services you are providing you need to register with ACOT in these circumstances. The Remote Practice MOU only applies to occupational therapists who are registered in good standing with one or more of the Canadian regulatory organizations. Refer to the answer provided in question 5 for details on how to apply for registration to ACOT's General or Provisional Register.

If you are practicing from the territories but are registered in any other province, refer to the answer in question 2 to determine if you also need to be registered in Alberta.

4. I'm registered to practice in another province (or am practicing from one of the northern territories) and I'm not sure if the services I plan to provide virtually to clients physically situated in Alberta are considered restricted activities – how do I figure that out?

According to HPA Part 0.1 section 1.6(1)(a)(i)

*"1.6(1) No person shall perform a restricted activity or a portion of it on or for another person unless*

- (a) *the person performing it*  
(i) *is a regulated member and is authorized to perform it by the regulations.*”

Refer to Sections 38 and 39 of the [Health Professions Restricted Activity Regulation](#) for the list of restricted activities occupational therapists registered in Alberta can perform if competent to do so and in alignment with the practice of occupational therapy. Also, see the [Psychosocial Interventions: An Interpretive Guide to the Restricted Activity](#) for a description of which psychosocial interventions are considered restricted and thus require registration in Alberta.

5. I'm registered to practice in another province, and I've determined that the services I plan to provide virtually to Alberta clients are restricted activities – how do I go about registering with ACOT?

Depending on how long you plan to provide services to Alberta clients you can apply to be on either the

- Courtesy Register if you are providing services on a short-term basis (\$40 for ≤30 days up to a maximum of three x 30-day registrations in a year);
  - Requires abbreviated application only – a [Regulatory History](#) completed by the regulatory organization(s) you are currently registered with must be received by ACOT prior to processing your application.
- General Register or Provisional Register if services will be provided beyond a 90-day time period (>3 x 30 days).
  - Requires completion of a full application including a [Regulatory History](#) and a [Labour Mobility Support Agreement Confirmation Form](#) completed by the regulatory organization(s) you are currently registered with along with other mandatory documentation.
  - Refer to the [Registration](#) section on ACOT's website for further information on how to apply to the General or Provisional Register.

6. I'm registered to practice in another province, and I've determined that the services I plan to provide virtually to Alberta clients are not restricted activities – do I need to be registered to practice in Alberta?

If you are providing non-restricted activities, you can practice virtually in Alberta based on your registration in a province that has signed the Remote Practice MOU (all provinces except BC). Make sure your client knows which province you are providing services from and the name of your regulatory body, so they know where to bring a complaint if there are concerns about your practice. You are required to comply with applicable regulatory and professional legislation for the province you are registered in, but you should also be aware of relevant Alberta legislation, regulations, standards of practice and code of ethics. Also, refer to ACOT's [Considerations for Virtual Practice](#) guideline for additional important considerations prior to proceeding with virtual service delivery.

7. I'm registered to practice in another province and I'm providing teaching to (i.e., courses or workshops) or supervision of ACOT registrants and /or students – do I need to be registered to practice in Alberta?

This depends on whether you are providing teaching or supervision virtually to or in-person in Alberta. With the Remote Practice MOU, if you are providing teaching or supervision virtually, you do not have to be registered with ACOT unless you are providing teaching or supervision of a restricted activity or providing the teaching/supervision from BC.

If you registered elsewhere in Canada and are providing teaching (i.e., courses or workshops) or supervision in-person in Alberta, you need to be registered with ACOT. If you are in Alberta for a period of  $\leq 30$  days, you may apply to ACOT's Courtesy Register. See the answer provided to question 5 for details on the application process.

**NOTE:** *The requirement to be registered when providing teaching is waived for presenters/attendees at the Canadian Association of Occupational Therapists (CAOT) annual conference when hosted in Alberta.*

8. I am registered to practice in Alberta and my client has moved to, or is on vacation in another province or territory, do I have to register in that province or territory?

That depends on where your client is physically situated at the time of service delivery and what services you plan to deliver – refer to the answer provided in question 1 above.

9. My clients are in Alberta, and I am registered to practice in Alberta, but I am currently in another province/territory temporarily (e.g., 45 days or less on vacation, caring for a family member) – do I need to be registered in the province I am providing service from?

No, unless you are in BC while providing services in which case you must register with [BC's regulatory body](#).

10. My client did not tell me that they were in BC/SK (or QC if providing a reserved activity) until after our therapy session started – what should I do?

Stop the therapy session and inform the client that you cannot provide services to persons physically located in BC or SK (or QC if providing a reserved activity) without being registered first. You will either need to register with [the](#) College of Health and Care Professionals of BC (full, provisional or temporary registration), apply for extended access membership with SCOT (or apply for special authorization from OEQ), or refer the client to a service provider who is registered to practice in BC or SK (or QC).

To avoid this, it is important to let your clients know to inform you of their plans to move/travel so that you can arrange for registration (if required) and update your emergency response plan including familiarizing yourself with the local emergency and community support services in case of an adverse or unexpected event.

11. My client has moved permanently to Alberta and has found another occupational therapist to provide the restricted psychosocial interventions we had been using –

do I have to be registered in Alberta before I call the new occupational therapist for a handover conversation? (my client is aware and has consented to me calling the new occupational therapist)

Follow-up with an occupational therapist in Alberta for the purposes of handover (i.e., one or two phone or video calls or an email exchange) does not require registration. This is typically the case for other provinces as well.

## B. Practice Outside of Canada

**NOTE:** *The Remote Practice MOU **does not** extend to occupational therapy regulators outside of Canadian borders. See the [Cross Jurisdiction virtual Practice Decision Tree](#) on page 9 for more information about registration requirements for practice outside of Canada.*

12. My client is moving to (or is on vacation in) another state/country. Can I still provide services virtually?

Check to see if registration in the state/country where the client is physically situated (temporarily or permanently) is a requirement.

Not all countries have occupational therapy regulatory legislation or regulatory bodies/organizations (see the [WFOT International Practice Guide](#)). You are responsible for confirming whether registration is required or not. If registration is required, do so prior to providing services. If registration is not required, document this in the client file and ensure your client is aware you are providing services from Alberta, Canada and to contact ACOT if they wish to bring forward a complaint.

13. My client did not tell me that they had moved out of the country until after our therapy session started – what should I do?

Stop the therapy session and advise the client that you will need to investigate to ensure that you are able to continue to provide services given the change in the client's location. Depending on the state/country your client is in, this could be considered "practicing without a license." Reach out to the regulatory body where the client is/was physically situated at the time of service delivery to inform them of the situation. If you are required to be registered and registration is not possible (e.g., the United States require passing of their national exam as part of their registration process even if services are provided virtually), ask the regulator for assistance in identifying an occupational therapist registered in that jurisdiction who can provide the client with services.

It is important to let your clients know to inform you of their plans to move/travel so that you can arrange for registration (if required) and update your emergency response plan including familiarizing yourself with the local emergency and community support services in case of an adverse or unexpected event.

14. My clients are situated in Alberta, and I am registered to practice in Alberta, but I am currently in another state/country temporarily (e.g., on vacation, caring for a family member) – do I need to be registered in the state/country I am providing service



from?

The Remote Practice MOU is only valid within Canada. ACOT cannot speak to the registration requirements outside of Canada. Check whether registration in the state/country where you are physically located (temporarily or permanently) is required prior to the delivery of any occupational therapy service.

15. Are there any plans for Canadian occupational therapy regulators to enter an international Remote Practice MOU?

Not at this time.

### C. Important Considerations

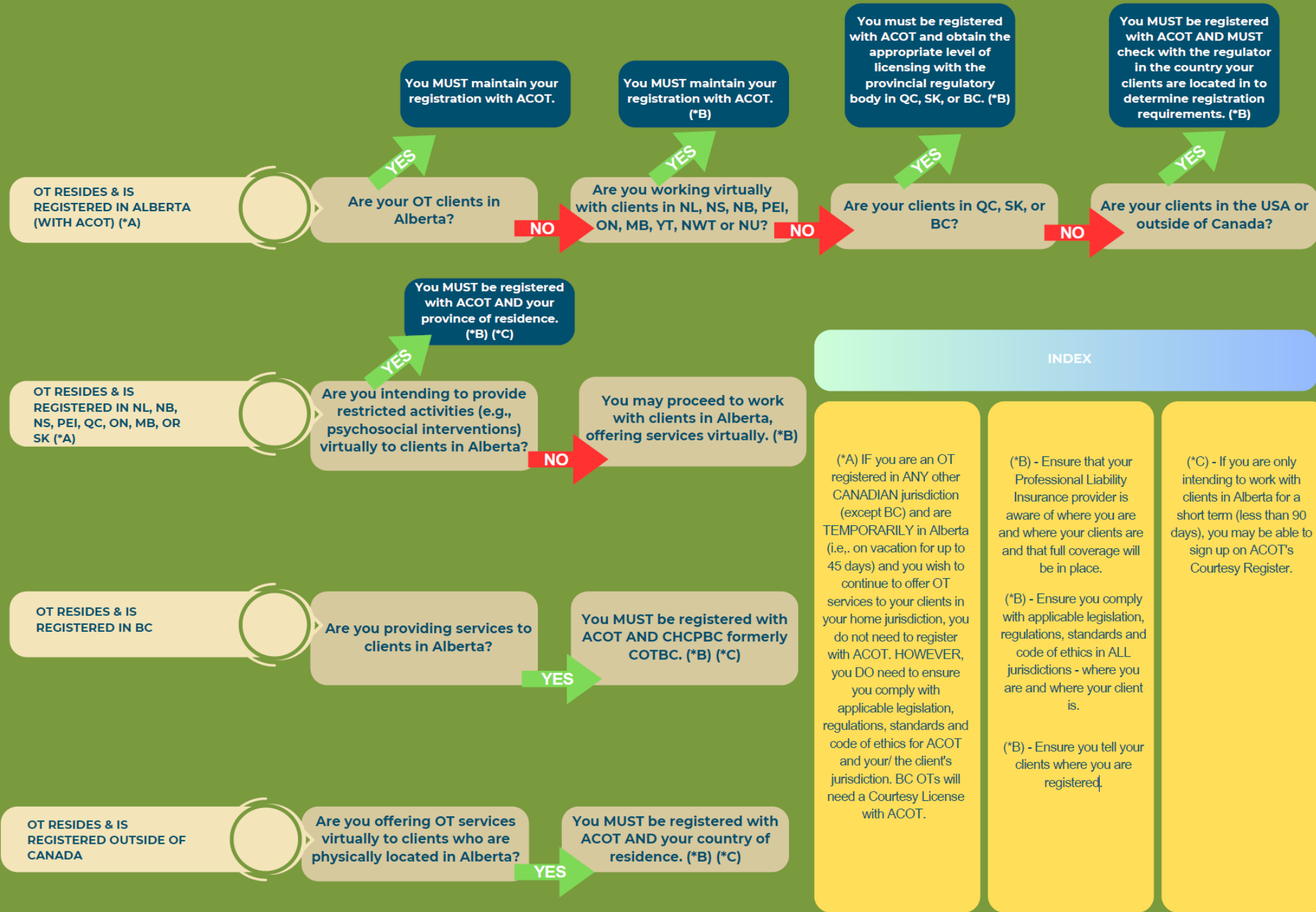
1. Who a client is will depend on the occupational therapist's practice role (i.e., whether they are a clinician, consultant, researcher, educator or administrator).
2. When providing virtual care to a client ensure that you have established an emergency response plan and have familiarized yourself with the local emergency and community support services in case of an adverse or unexpected event.
3. If a complaint about your practice is filed, an investigation will be conducted based on the legislation, regulations, standards and code of ethics for the province of primary registration. You are also expected to be aware of the applicable legislation, regulations, standards and code of ethics in the jurisdiction where your client is located (either temporarily or permanently) and from where you are temporarily providing services.
4. You should confirm with your insurance provider that your coverage extends beyond your jurisdiction of registration.
5. The three Canadian territories do not have regulatory bodies. Although registration is not required if practicing within the territories to clients physically situated in the territories, some employers require registration in one (or more) of the bordering provinces. The territories are not subject to the Remote Practice MOU. If you are providing services to clients physically situated in any of the Canadian provinces, you will need to be registered with at least one of the Canadian provinces for the Remote Practice MOU to apply.
6. Occupational therapists who are registered in good standing elsewhere in Canada still need to register with ACOT if they are providing occupational therapy services (including teaching or supervision) in-person in Alberta or are providing a restricted activity virtually to a client who is physically situated in Alberta. See the [Registration page](#) on the ACOT website for information on how to apply or re-apply for the General, Provisional, or Courtesy Register.
7. British Columbia has not signed the Remote Practice MOU at this time.
8. According to the [Quebec Professional Code](#) (QPC - article 37.1), occupational

therapists wanting to provide services to a client physically located in QC require special authorization to practice in QC if they are providing any of the reserved activities outlined in [article 37.1\(4\)\(a\)-\(h\)](#) – whether those activities are conducted in-person or virtually. As per correspondence with the Ordre des ergothérapeutes du Québec (OEQ) in March 2024 – *“If you do not intend to carry out the activities reserved for occupational therapists to a client who is physically located in Quebec, you do not need to get any authorization to practise from OEQ. However, it is your responsibility to be aware of the limits of your interventions (no reserved activities, and if you designate yourself as an OT, you must specify that you are a registrant of your regulatory organization).”*

9. The Remote Practice MOU permits an occupational therapist registered in a signatory province to provide occupational therapy services virtually to clients physically situated in the province of registration, from another province temporarily without needing to be registered in that other province.
  
10. Regulatory legislation for occupational therapists varies from state to state and country to country. When providing virtual services outside of Canada you are advised to contact the regulatory body of the state/country you/your client is physically situated in to confirm whether registration is required or not in that jurisdiction (see the [WFOT International Practice Guide](#)). If registration is required, do so prior to providing services. If registration is not required, document this appropriately in the client file then ensure your client is aware you are providing services from Alberta, Canada and that if they want to submit a complaint they can do so with ACOT.
  
11. **IMPORTANT:** For occupational therapists registered outside of Canada wishing to provide occupational therapy services virtually to Albertans – registration with ACOT is required and application paperwork must be received and approved (including completion of the [ACOTRO SEAS process](#)) prior to delivering services.



# Cross Jurisdiction Registration Requirements Decision Tree



## INDEX

(\*A) IF you are an OT registered in ANY other CANADIAN jurisdiction (except BC) and are TEMPORARILY in Alberta (i.e., on vacation for up to 45 days) and you wish to continue to offer OT services to your clients in your home jurisdiction, you do not need to register with ACOT. HOWEVER, you DO need to ensure you comply with applicable legislation, regulations, standards and code of ethics for ACOT and your/ the client's jurisdiction. BC OTs will need a Courtesy License with ACOT.

(\*B) - Ensure that your Professional Liability Insurance provider is aware of where you are and where your clients are and that full coverage will be in place.

(\*B) - Ensure you comply with applicable legislation, regulations, standards and code of ethics in ALL jurisdictions - where you are and where your client is.

(\*B) - Ensure you tell your clients where you are registered.

(\*C) - If you are only intending to work with clients in Alberta for a short term (less than 90 days), you may be able to sign up on ACOT's Courtesy Register.