



Nova Scotia Regulator of Psychology

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PROVISION OF ALTERNATIVE SERVICES

Registrants of the Nova Scotia Regulator of Psychology (NSRP) are uniquely qualified to provide psychological services in the province.

The Psychologists Act of Nova Scotia defines psychology as:

2(l) “psychology” includes

- (i) the practice of examining the behaviour of children and adults,
- (ii) diagnosing psychological and emotional disorders,
- (iii) providing consultation and therapy,
- (iv) counselling individuals, groups and organizations to enhance physical and mental health and to achieve more effective personal, social and vocational development and adjustment,
- (v) teaching and applying psychological theory and principles regarding behaviour and mental processes such as learning, memory, perception and human development, and
- (vi) designing, conducting and communicating the results of psychological research;

From the NSRP Standards of Professional Conduct, “Psychological services refer to services provided by or [under the direction of a psychologist or psychologist, candidate register.](#)”

In this document the phrase “alternative services” is used broadly to refer to any service that may be offered by a registrant of NSRP that is not part of the scope of practice of psychology **or** not necessarily part of the scope (potentially falling into a gray area) and that have the potential to present challenges that will be elaborated upon further in this document.

NSRP has received questions from some registrants who are offering services that fall outside the scope of practice of psychology. Some other NSRP registrants are working in another domain/profession or completing an activity which may or may not overlap with the scope of practice of psychology (falling into a gray area). Various examples are provided below in the form of scenarios, though this document may not be an exhaustive presentation. Following each scenario, some additional questions are provided for the registrant’s self-reflection. There can be overlap with the information and considerations across scenarios, so the document should be read in full.

One intention of this document is to make **NSRP registrants** aware of the risks that can be present when providing alternative services, or holding registration in another profession. However, the overriding purpose of this document is to protect the public and, in this regard, provide considerations for registrants should they be contemplating or providing alternative services.

1) Services Outside the Scope of Practice of Psychology

Psychologists who choose to also provide services outside of the scope of practice of psychology must, at a minimum, keep the delivery of those services separate from the delivery of psychological services.

NSRP emphasizes the importance of providing non-psychological services separately from psychological services, so that any individual is clear when they are receiving psychological services and when a non-psychological service is being provided (e.g., acupuncture).

Additionally, psychologists should not take on a dual role in which they would benefit from introducing and providing non-psychological services to an existing client (e.g., providing acupuncture to an existing client receiving psychological services).

Despite the importance of keeping non-psychological services separate from the practice of psychology, NSRP may still receive and investigate complaints pertaining to the provision of non-psychological services by a registered psychologist.

Additional Considerations:

- What is my reason for working in another domain?
- What are the ethical considerations?

2) Registration/Services that may Overlap with the Scope of Practice of Psychology

Regulated professions generally have a scope of practice outlined in their legislation. As noted above, the scope of practice for psychology is set out at section 2(1) of the *Psychologists Act*.

Some registrants of NSRP have also chosen to become registered with another regulated profession, (e.g., counselling, social work).

Psychologists who choose to register with another profession that may have some overlap with the practice of psychology should inform clients that they are registered with both regulatory bodies. It would be important through the informed consent process that the registrant informs clients what services are within the scope of practice of psychology and what services fall within the scope of practice of the other profession. Please note that NSRP regulates the practice of psychology and therefore can only speak to the practice of psychology. NSRP cannot provide advice for articulating the other profession's scope of practice; such clarifications would be the

professional's responsibility and it would be advisable to speak to the regulatory body of the other profession.

Registrants should be aware that if a client wished to make a complaint, complaints could be submitted to both regulatory bodies, regardless of the services provided. The two regulatory bodies may conduct independent investigations, or may conduct a collaborative investigation.

Registrants should not assume their professional liability insurance for services provided as a psychologist will provide coverage for services provided as part of another profession.

Additional Considerations

- What is my purpose of holding registration in the other profession?
- What are the services that are enabled by registration with the other profession that are not authorized by NSRP?
- What are the ethical considerations?
- What is my basis for establishing competence to carry out the services that fall under the other profession's registration?
- Are there policies, rules or standards in the other profession that conflict with legislation and standards applicable to my registration with NSRP?

3) Other Activities that may Impact Psychological Health

Some registrants may integrate a particular activity into a session as a means of introducing a technique (e.g., such as regular exercise, yoga, or meditation).

While various activities may have psychological benefits or health benefits, they do not automatically constitute a psychological service to be delivered on an ongoing basis.

Psychedelic Assisted and other Novel or Emerging Treatments

Psychedelic treatment is an emerging topic in Canada and some psychologists have asked about providing psychedelic assisted therapy.

At this time, NSRP does not have a specific position on psychedelic-assisted therapy.

There may be risks or perceived harm if a therapist is alone with a client who's in an altered state for a lengthy duration. Consequently, if a registrant ethically determines that they will engage in such service, provisions will need to be made demonstrating that the individual and professional remain safe during the process.

Psychologists are reminded of Ethical Standard II.18 from the Canadian Code of Ethics (Fourth Edition):

Strive to provide and/or obtain the best reasonably accessible service for those seeking psychological services. This may include, but is not limited to, selecting assessment tools,

methods, interventions, and communication modalities that are: (a) relevant and tailored to the needs, characteristics, and contexts of the primary client or contract examinee; and (b) based on the best available evidence in light of those needs, characteristics, and contexts. It also may include but is not limited to: consulting or collaborating with service-providing organizations in the community, members of other disciplines, individuals and groups relevant to the culture or belief systems of those receiving or being subject to services; or advocating on behalf of a primary client when appropriate and needed.

The Code of Ethics defines “*best available evidence*” as “... the evidence that is the most trustworthy and valid according to a hierarchy of evidence (i.e., a hierarchy that ranks evidence from strongest to weakest), and which is appropriate to the services being delivered.”

Those who are interested in providing **alternative, novel or emerging treatments** and believe these treatments are within the scope of practice of psychology are encouraged to review the Checklist developed by the College of Psychologists of British Columbia, referenced below. While NSRP uses the Canadian Psychological Association’s Code of Ethics and NSRP Standards (not the BC Code of Conduct) there is a fair amount of overlap with the items noted in this publication and equivalent principles and standards contained in [NSRP professional standards](#).

Considerations Before Offering a Novel or Alternative Type of Service Checklist [https://www.ns-
rp.ca/downloads/BC_Considerations_Offering_a_Novel_Alternative_Service.pdf](https://www.ns-
rp.ca/downloads/BC_Considerations_Offering_a_Novel_Alternative_Service.pdf)

Additional Considerations:

- Do I have the necessary competence, training, and experience to provide these services?
- Is this intervention grounded in evidence-based practice (e.g., approaches backed by some peer-reviewed studies indicating their efficacy for the specific disorders being treated)?

4) Use of unregulated title when providing psychological services

There may be some psychologists who use a title or term other than “psychologist” or “psychological” to describe themselves or the services they provide. If a registrant provides psychological services in another jurisdiction, but chooses to use an unregulated title in an attempt to avoid the requirement of psychological registration in the other jurisdiction, this may be seen as unethical and a potential violation of law in the other jurisdiction. NSRP cannot speak to the interpretation of a regulatory body in another jurisdiction and, on this point, merely wishes to make registrants aware of the risks should they choose to operate using an unregulated title or description of services.

Additionally, regardless of the location of services, members of the public may be unclear what framework and standards the registrant is operating from if an unregulated title is used. Such confusion can take place even if roles are described in a way that does not represent them as psychological. Registrants of NSRP may be discovered or sought out by potential clients. Consequently, if a registrant describes themselves using an unregulated title (e.g., Coach), the member of the public seeing the registrant may still believe they are seeing a psychologist. And

in fact, they would be seeing a psychologist who is using a different title and description of services. Psychologists could still be the subject of a complaint (as a regulated health professional) regardless of terminology used to refer to themselves or their services.

5) Risks of providing unregulated services

Notwithstanding the above, there is a potential risk to the recipients of such services if they conclude they cannot complain to a regulatory body regarding unregulated activities, no matter how serious their concerns about the work of the registrant.

Registrants may have no liability insurance to cover unregulated services that are outside of the scope of practice of psychology. This can place the service provider and individual receiving service at risk as it could lead to a situation that limits the recourse available to a member of the public who believes they have been harmed by the actions of the provider.

If a registrant is choosing to operate as a non-psychologist in a particular role, yet billing for psychological services, this would not only be unethical but may constitute fraud.

It should be noted that there is nothing that prevents a registrant from providing services such as coaching or similar services under their registration as consultation, provided one has relevant training for the particular type of consultation. However, reimbursement of such service would be within the discretion of the insurer, if reimbursement of services will be sought by the client. As in all cases when providing psychological services, billing must be transparent.

Additional Considerations:

- Why am I refraining from calling myself a psychologist and not referring to my services as psychological?
- What if any standards am I using to guide my practice?
- Would the language I use to describe myself and my services (when operating in the alternative domain) be reasonably clear and easily understood by a member of the public?
- How is the public protected if my services are arranged so that they are not seen to be conducted under my NSRP registration?
- What are the ethical considerations

Additional Considerations for all Scenarios

- Is there legislation that may apply to me as a regulated health professional regardless of the role I am working in (e.g., Personal Health Information Act, mandatory reporting, etc.)
- Do I have liability insurance that covers all of the services I provide?
- Am I keeping clinical notes?

Have I followed an ethical decision-making process before engaging in this work? Have I documented my decision-making process?

- Have I reviewed the NSRP document [Communication by Registrants](#) in relation to any psychological services I provide?

Concluding Remarks

The Board does not wish to endorse or prohibit the provision of additional services in a blanket manner. Rather, NSRP is providing some considerations in relation to the protection of the public should a registrant be contemplating or already carrying out such activities. The Board hopes that this document assists registrants with taking the appropriate time to thoroughly engage in a process to reflect on and address all ethical and legal considerations.

This document was issued by the Nova Scotia Regulator of Psychology in October 2023. Information provided in this publication is not to be construed as legal advice or to substitute for the psychologist's own awareness of the legislation and standards of practice. For legal advice, please speak to your own lawyer or contact the pro bono legal hotline of your professional liability insurer.