

### USE OF TITLE

A title can quickly impart information to the general public, clients or other health professionals. It may confirm education and professional designation, provide information about a job role, convey professional affiliations, or represent additional qualifications.

The ability to use the protected title outlined in regulation or statute is a privilege granted to members of a regulatory college who have demonstrated they possess the required education qualifications, knowledge, skills and attributes to practise their profession.

In Manitoba, you are required to be registered with COTM to:

- use the title of occupational therapist, OT, or O.T.
- represent yourself as an occupational therapist in work or practice context;
- work as an occupational therapist;
- refer to your practice or work as occupational therapy, and
- use the formal regulatory title O.T. Reg.(MB) or OT Reg.(MB).

According to *The Occupational Therapists Act* and the *Occupational Therapists Regulation* (view in Appendix, page 6), only members of the College of Occupational Therapists of Manitoba (COTM) are permitted to use titles such as *occupational therapist* or abbreviations such as OT, or equivalent terms in other languages or state they are providing occupational therapy services.

#### How do I use the protected title?

A member of COTM on the Register of Practising Members should use the terms *occupational therapist* or OT or O.T. to indicate their professional designation.

A member is **entitled**, and encouraged, to use the abbreviation O.T. Reg. (MB) or OT Reg. (MB).

Members should represent their professional designation clearly. Consider the use of other credentials and job title information from the perspective of your clients. Make provisions to explain what these mean and how they relate to your services.

#### How do I communicate my education as an occupational therapist along with my professional title?

If your name is on a COTM Register that permits practice, then you should indicate that following your name on business cards by use of the O.T. Reg. (MB) or OT Reg. (MB). This is the information that clients require to confirm that you are in the legal position to practise occupational therapy in Manitoba. You can then list your education. You must not combine your education degree [e.g., M.O.T., B.M.R. (OT)] with the title permitted by COTM members [i.e., O.T. Reg. (MB)]. Each of these abbreviations communicates distinct information so make sure that each abbreviation is presented completely and not merged with another, as is done in this example, B.M.R. OT Reg. (MB). This is incorrect and should be written as O.T. Reg. (MB), B.M.R. (OT).

Occupational therapists may have completed other degrees before or after their occupational therapy education. These university degrees can be used by members following their name as long as this additional information is not misleading regarding the services they are providing. The reserved title can be placed before or after the university degrees. Example: Mary Smith, O.T. Reg. (MB), MOT, B.A. or Mary Smith, MOT, B.A., O.T. Reg. (MB).

### **My job title is not Occupational Therapist, do I still need to communicate my Occupational Therapist designation?**

Many job titles are descriptive and can provide useful information to the public about your role. You can use your protected title and job title. Example: John Smith, Occupational Therapist, Case Manager, Winnipeg Regional Health Authority.

If you have declared with COTM that you are working as an occupational therapist in a position with a job title that is not occupational therapist it is important that your clients and colleagues know that you are a registered occupational therapist. You have declared on your initial application for registration and on each subsequent renewal that you will adhere to the regulatory requirements of COTM. Using your professional designation allows others to know that you are accountable to COTM and that you uphold certain professional responsibilities in your position.

Job title and professional designations communicate different, but equally important, information to those with whom you come in contact as a professional.

You may find the joint **Position Statement on Use of Title** of value.

[position statement on professional identity individual responsibility and public accountability through the use of title.pdf \(acotro-acore.org\)](#) It was prepared by the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO), of which COTM is a member, along with ACOTUP, CAOT, PAC and COTF.

Your employer must also support that you are working as a regulated occupational therapist. *The OT Act* specifies employer responsibilities; as a consequence, you will not be considered by COTM to be practising occupational therapy if your employer does not view you working in that capacity. Without this employer acknowledgement, your accountability to clients and COTM would be compromised. If you are unclear whether or not a current or prospective position would be considered the practice of occupational therapy, you are urged to contact COTM.

### **Can I communicate my education even if I am not registered with COTM or do not have my name on a COTM register that permits practice?**

The key here is the provision in *The Occupational Therapists Act* which discusses misrepresentation. As noted in S 3(1) *No person except an occupational therapist shall represent or hold out, expressly or by implication, that he or she is an occupational therapist or is entitled to engage in the practice of occupational therapy as an occupational therapist.*

Further, in the Definitions section of *The OT Act*, occupational therapist is defined as **a person who is registered as an occupational therapist under this Act.**

If there is no possibility that you are leading others to believe that you are providing services as an occupational therapist or implying that you are registered as an occupational therapist, then you can indicate that you have occupational therapy education.

If you are in this situation, and wish to determine how best to communicate that you have occupational therapy education but are not practising as an occupational therapist in Manitoba, you are advised to contact the COTM office for support so we can discuss your particular situation.

## **How do I represent myself as an OT if I am not on the COTM Register of Practising Members?**

If your name is on the COTM Register of Provisional Members you are instructed by COTM to sign your name as Provisional O.T. (e.g., *Erin Doe, C.O.T.M. Provisional O.T. or Erin Doe, COTM Provisional OT*) Upon request, you should be able to provide your certificate of practice – that is, your COTM membership card – or a registration letter from COTM, which will indicate the Register on which your name appears.

If your name is on the COTM Register of Non-Practising Members, you should not be representing yourself as an occupational therapist in any professional capacity.

If your name is on the COTM Register of Temporary Members, you will have a letter, which you should be able to produce upon request, outlining the time and scope limitations of your Temporary Registration.

If your name is not on any register then you should not be representing yourself as an occupational therapist in a professional capacity.

## **I have retired from practice or have left practice, can I still communicate that I am an occupational therapist?**

The key here is the provision in *The Occupational Therapists Act* which discusses misrepresentation. As noted in S 3(1) *No person except an occupational therapist shall represent or hold out, expressly or by implication, that he or she is an occupational therapist or is entitled to engage in the practice of occupational therapy as an occupational therapist.*

(See above for definition of “occupational therapist” in OT ACT)

If there is no possibility that you are leading others to believe that you are providing services as an occupational therapist or implying that you are a registered as an occupational therapist, then you can indicate that you have occupational therapy education and practised as an occupational therapist in the past.

If you are in this situation, and wish to determine how best to communicate that you have occupational therapy education and worked as an OT in the past but are not practising as an occupational therapist in Manitoba, you are advised to contact the COTM office to discuss your particular situation.

## **I am a member of CAOT; are there limitations on my use of OT(C)?**

Although you may wish to promote your membership in professional associations, designations such as OT(C) can be misinterpreted. The public might consider this to mean “certified” occupational therapist rather than a member of the Canadian Association of Occupational Therapists. Consider the purpose for using such a designation. Perhaps it would be clearer to state on a business card: *Proud member of my professional association - CAOT.*

If you are **not** registered with COTM, you could be considered to be holding out that you are an occupational therapist if you use the OT(C) designation after your name on a business card and therefore you may be subject to fine or penalty.

## **I have taken a number of certificate courses; how can I communicate that I am a specialist in my area of practice?**

Use of the title “specialist” is regulated by COTM through the authority to establish additional registers. To date, COTM has not established any specialist registers. Therefore, members are advised not to use the term “specialist” or any similar designation, suggesting a recognized special status, in

any communications such as advertising or business cards. Rather, in more narrative materials, the member can describe the additional training one has acquired and the area of focus of their practice. We recognize that some job titles use the term “specialist” - such as Clinical Specialist. In this context it is useful to use a different term if possible like Practice Leader. However, if the term “specialist” is in your job title, you should represent this information as Jane Doe, OT Reg. (MB), Clinical Specialist - Occupational Therapy, Name of Agency.

### **How would OT students or support personnel communicate their titles?**

**Students:** It is important that the public is clear with whom they are working and clients need to understand that the individual is a student and under the supervision of a registered occupational therapist. COTM recommends that occupational therapy students use the following designation(s) on a name badge and client records as well as making it clear to the public and team members of their role as a student in the fieldwork placement. Examples: *student occupational therapist* or *student OT* or *student O.T.* or *occupational therapy student* or *OT student* or *O.T. student*.

**Support Personnel:** The same concept applies to unregulated support personnel. Occupational therapists assigning service components to support personnel should keep in mind what is represented to their clients. The support personnel should clearly indicate that they are working in the role of an assistant and are under the supervision of a registered occupational therapist. Examples include: *rehabilitation assistant, OT assistant*.

you are encouraged to review the new OT standard for more guidance on representation and use of title. [Extending OT Interventions \(cotm.ca\)](https://www.cotm.ca/Extending-OT-Interventions)

### **When should someone not use the title *Occupational Therapist*?**

The misuse of title occurs when an individual:

- is not an occupational therapist and uses a protected title;
- is not an occupational therapist and practises in a manner which would lead someone to believe they are a registered OT;
- is practising occupational therapy and has not registered with COTM;
- is practising occupational therapy after having cancelled their registration with COTM; and/or
- is on the Non-Practising Register with COTM.

If you have any concerns about someone incorrectly using title, please contact the Registration and Financial Coordinator at COTM [registration@cotm.ca](mailto:registration@cotm.ca)

### **Is it acceptable to refuse to give a client my name?**

For reasons of protection of personal safety, professionals may communicate only their first name to clients. This decision should never be taken lightly and should be done after consultation with a supervisor. Even in this situation, there must be some vehicle for clients to send a complaint to COTM if they wish to file a concern regarding the occupational therapist’s conduct. COTM has the ability to protect the member’s identity while still carrying out its investigation.

### **If my questions do not appear, what do I do?**

COTM has a number of Information Sheets on a variety of registration-related topics. Please take the time to see if any are relevant to your query; they can be found at the following link: [Registration FACTS Sheets & Guides – College of Occupational Therapists of Manitoba \(cotm.ca\)](https://www.cotm.ca/Registration-FACTS-Sheets-Guides)

The staff at COTM is available to discuss your particular question with you.

## References:

Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO). (2012) **Position Statement on Use of Title**. Ottawa, ON: Author. [position statement on professional identity individual responsibility and public accountability through the use of title.pdf \(acotro-acore.org\)](#)

College of Occupational Therapists of British Columbia. (January 2020) **College of Occupational Therapists of British Columbia Advisory Statement on Use of Title**. Victoria, BC: Author. [COTBC Advisory Stmt Use of Title Statement Feb2018-Revised-January-2020.pdf](#)

College of Occupational Therapists of Ontario. (2012). **College of Occupational Therapists of Ontario Position Statement: Use of Title**. Toronto, ON: Author. [guide-to-use-of-title-2012.pdf \(coto.org\)](#)

*The Occupational Therapists Act*, Manitoba, C.C.S.M. Chapter 05. [C.C.S.M. c. 05 \(gov.mb.ca\)](#)

*The Occupational Therapists Regulation*, Manitoba. [Occupational Therapists Regulation, M.R. 174/2005 \(gov.mb.ca\)](#)

For more information, please contact COTM at (204) 957-1214 or by email at [registration@cotm.ca](mailto:registration@cotm.ca)

This publication is provided for general information. For more specific information see *The Essential Competencies of Practice for Occupational Therapists in Canada*, 3<sup>rd</sup> Edition 2011  
The COTM *Code of Ethics* for Occupational Therapists and  
*The Occupational Therapists Act and Regulation*.  
COTM publications are available on our website at [www.cotm.ca](http://www.cotm.ca)

## APPENDIX A

### **A. The Occupational Therapists Act**

#### **Part 1 - Definitions**

"occupational therapist" means a person who is registered as an occupational therapist under this Act; (« ergothérapeute »)

#### **Part 2 – Practice of occupational therapy**

##### **Representation as an occupational therapist**

3(1) No person except an occupational therapist shall

(a) represent or hold out, expressly or by implication, that he or she is an occupational therapist or is entitled to engage in the practice of occupational therapy as an occupational therapist; or

(b) use any sign, display, title or advertisement implying that he or she is an occupational therapist.

##### **Use of titles**

3(2) No person except an occupational therapist shall use the title "occupational therapist", a variation or abbreviation of that title, or an equivalent in another language.

#### **Part 4 – Registration**

##### **Registers**

7(1) Subject to the direction of the council, the registrar shall maintain the following registers:

(a) a register of occupational therapists;

(b) any other registers that are provided for in the regulations.

#### **Part 8 – General Provisions: Offences**

##### **Offence**

58(1) A person who contravenes a provision of this Act or the regulations, other than section 62 of this Act, is guilty of an offence and is liable on summary conviction

(a) for a first offence, to a fine of not more than \$5,000.; and

(b) for a subsequent offence, to a fine of not more than \$15,000.

##### **Single act of unauthorized practice**

59 In any prosecution under this Act it is sufficient to prove that the accused has done or committed a single act of unauthorized practice, or has committed on one occasion any of the acts prohibited by this Act.

#### **Part 8 – General Provisions: Employer's Responsibility**

##### **Employer's responsibility to ensure registration**

65(1) No person shall knowingly employ or continue to employ a person to perform the practice of occupational therapy unless the person is an occupational therapist registered under this Act.

## **B. The Occupational Therapists Regulation**

### **Use of title**

6 Every member on the register of occupational therapists is entitled to use the abbreviation O.T. Reg. (MB) following his or her name or signature.