

Practising Before Being Registered: Updated Guidance

Proposed Wording for the CMTO Student Guide:

Practising Massage Therapy Before Registration

Only a College of Massage Therapist of Ontario (CMTO) registrant may hold themselves out as qualified to practise Massage Therapy in Ontario. This means that students and graduates of Massage Therapy programs cannot refer to themselves as a Registered Massage Therapist/Massage Therapist (RMT/MT) or imply that they are qualified to practise as a RMT/MT until they are registered with CMTO.

Only individuals who are registered with CMTO may use the titles “Massage Therapist”, “Registered Massage Therapist”, or any variation, abbreviation, or equivalent in another language (such as “RMT” or “MT”). Terms like “Student RMT” or “Graduate RMT” are not permitted.

In this guidance, ‘practising Massage Therapy’ refers to a person who is registered with CMTO as an RMT/MT providing Massage Therapy services in Ontario. It does not apply to a student learning how to provide treatment as part of their recognized Massage Therapy diploma program.

Massage Therapy cannot be delegated by an RMT/MT to any other person, including a student or graduate of a recognized Massage Therapy program.

Student Clinics

Students are permitted to provide supervised treatments to members of the public only in student clinics or community outreach activities that are part of their formal Massage Therapy education program. Supervision of the clinic or outreach activity must be provided by an instructor of the student’s Massage Therapy program. The instructor must be an RMT/MT who holds a General Certificate of registration in good standing with CMTO and has more than two years of clinical practice experience.

Students may use the term “Massage Therapy Student” only within their program’s student clinic environment and only when performing activities that are part of their educational requirements.

Unregulated Massage Services

Regulation of Massage Therapy protects the public. Before a student or graduate provides unregulated massage or bodywork services, they should consider the critical role regulation plays in protecting the public (information about CMTO's public protection role is available on the '[How Regulation Protects You](#)' page of CMTO's website). In Ontario, the RMT/MT designation signals to the public that the therapist has met established entry-to-practice requirements, participates in ongoing professional development, and is accountable to CMTO for providing safe, ethical, and competent care.

CMTO does not have authority over individuals who provide unregulated massage or bodywork services. Students or graduates who provide unregulated massage services before being registered with CMTO should be aware of the potential risks to the individuals who receive those services, including:

- **Unknown quality of care** — Students and graduates have not yet demonstrated that they meet the minimum competencies required for Massage Therapy practice:
 - Graduates have not yet passed the CMTO Certification Examinations.
 - Students have incomplete education, and gaps in knowledge, judgment, and experience may create risks for clients.
- **Lack of regulatory oversight** — Students and graduates are not subject to CMTO's Standards of Practice, Code of Ethics, Rules of Conduct, or Quality Assurance Program, and are not accountable for meeting its rules and standards.
- **Lack of transparency** — Individuals receiving unregulated services may not be aware that:
 - The provider is not accountable to a regulatory body.
 - The provider may not carry professional liability insurance, leaving clients unprotected in cases of harm or injury.
 - The services are unlikely to be covered by extended health insurance plans.
 - The provider may lack the competence to identify and mitigate risks of harm.

A student or graduate who wants to become an RMT/MT should act in the best interest of the public. If they provide unregulated massage services before becoming registered, they should have clear and transparent policies and procedures in place to manage the risks. When they later apply for registration with CMTO, they will be asked to show proof of how they reduced the risks of practicing without regulation.

If a student or graduate is considering providing unregulated massage services before they are registered, it may be helpful for them to ask themselves:

- Is this in the best interest of the person receiving the service? Or is it in the best interest of me and/or my employer?

- Do I (or my employer) have clear policies and processes in place to address the concerns related to unknown quality of care, lack of regulatory oversight, and lack of transparency noted above?
- Will all relevant information be provided to the person who will receive the services *before* they make an appointment?
- Have I done all I can to ensure the person who will receive the services is being given an opportunity to make an informed choice about their service provider?

Impact when Applying for Registration

Students and graduates are reminded of their personal responsibility for their conduct prior to registration.

Providing unregulated massage services could affect the student or graduate's [application for registration](#), including:

- Delays in registration related to:
 - CMTO's review of evidence of how the applicant reduced the risks of practicing without regulation (and possible outcomes related to a lack of evidence, such as a requirement to complete additional education)
 - Investigations related to criminal, civil, or insurance-related complaints because of unregulated practice
- Expiry of education: The individual may be required to complete a CMTO Refresher Course before registration, if a delay leads to their education expiring.

Example: Providing Unregulated Massage Services

A recent graduate has been approached by the owner of a local Massage Therapy clinic to provide massage services before they are registered with CMTO. The graduate needs a job and thinks it would be helpful to keep their knowledge and skills fresh while they arrange to take CMTO's certification examinations.

The graduate is aware that there are risks to providing unregulated massage services, and that it's important for people who are seeking Massage Therapy treatment to make an informed choice when choosing services. The graduate reviews the guidance from CMTO and shares it with the clinic owner. The guidance shows that the graduate can take the job only if:

1. *There is no use of the RMT/MT designation (or a variation, like 'Graduate RMT') and no use of the term 'Massage Therapy' in relation to the graduate, the services they would provide, or any resulting receipts.*
2. *People who are seeking treatment are informed before they make an appointment with the graduate that the graduate:*
 - a. *Does not have professional liability insurance.*

- b. Has not met the requirements to be registered with the CMTO, the regulator for Massage Therapy in Ontario.*
 - c. Is not accountable to the CMTO and is not subject to CMTO's Standards of Practice, Code of Ethics, Rules of Conduct, or Quality Assurance Program.*
 - d. Is providing services that are unlikely to be covered by extended health insurance plans.*
- 3. A process is put in place for the graduate to reconfirm all of the information above with people who choose to receive their services before their appointment starts.*

The clinic owner understands the guidance, but their appointment booking system can't accommodate providing information to people before appointments are made. The clinic owner suggests that they could create a form for the graduate to disclose the information before treatment begins. The graduate is concerned that this is not in line with CMTO guidance, and a person who made an appointment and showed up at the clinic will feel pressured to proceed with the appointment. For this reason, the graduate decides to turn down the job.

Example: Holding out as an RMT/MT

A student is in their final term of study in a Massage Therapy program. There is a Massage Therapy clinic near the student's home that is owned by an RMT/MT. Over the holidays, the student is hired to work at the clinic. Given how close the student is to graduation, the owner suggests that the student should start to treat patients. A sign is placed in the reception area advertising the student as the "newest addition to the Massage Therapy team". The owner offers to supervise the student's work and to issue receipts to any patients the student treats in their name.

While applying for registration with CMTO the following year, the student discloses practising at the local clinic. The Registrar becomes concerned that the student has been holding themselves out as someone who is qualified to practise as an RMT/MT in Ontario without being registered. Patients may have believed that the student was an RMT/MT based on the sign in the reception area and the fact that the clinic still offered RMT/MT receipts for the student's services. The Registrar considers if the application should be referred to the Registration Committee for a decision, or if another outcome (such as additional education) is needed.

As a CMTO registrant, the clinic owner could face an investigation and a discipline hearing for allowing an unregistered person to provide services and for offering RMT/MT receipts for services provided by a student. If receipts were provided to patients in the RMT/MT's name, this would be considered fraudulent billing by the RMT/MT because the receipt would not accurately reflect the person who provided the treatment. Furthermore, if the student injured or had any sort of negative interaction with the patient, that patient would not be able to hold the student

accountable by filing a complaint to CMTO because the student is not yet registered. However, the patient might file a complaint to CMTO about the clinic owner. The student would also not be covered by professional liability insurance and, along with the clinic owner, could be exposed to serious personal liability if the patient sued them.

Proposed Wording to be added to the Certificate of Registration Policy:

6. Registrants do not have the authority to delegate Massage Therapy to a student or graduate of a recognized Massage Therapy program, or any other individual¹. A registrant must not allow their registration number to be used in connection with a treatment or service they have not provided directly. This includes treatment provided by a person under the supervision of the registrant. For example, a registrant is not permitted to develop a treatment plan for a patient and have it performed by another individual.

¹ Information about students and graduates practising before they are registered with CMTO is available in the CMTO Student Guide.