

## Overview

---

A Graduate Certificate of Registration may be issued to an individual who meets the CRTO's registration requirements, including academic requirements (e.g., has completed an educational program approved by the CRTO) but has not yet successfully completed the approved entry-to-practice exam.

Graduate Members (GRTs) may practise Respiratory Therapy in Ontario with restrictions or conditions imposed on their certificates of registration.

## Standard Conditions Applied to a Graduate Certificate

---

The following is a list of the **standard** conditions that apply to Graduate Certificates of Registration. Some GRTs may have additional conditions imposed on their certificates (e.g., by order of the Registration Committee).

**Members registered with a Graduate Certificate of Registration shall,**

- 1. At the first reasonable opportunity, advise every employer of any terms, conditions and limitations that apply to the Member's graduate certificate of registration if their employment is in the field of respiratory therapy.**
  - Graduate Members must tell their employers that there are conditions imposed on their certificates. All conditions applying to a Member's certificate are displayed on the [Register](#).
- 2. Only perform a controlled act that is authorized to the profession if it is performed under the general supervision of a member of a College within the meaning of the *Regulated Health Professions Act, 1991* who, the Member holding the graduate certificate has reasonable grounds to believe, is authorized to perform the controlled act and is competent to do so and who is available to be personally present at the site where the authorized act is performed on ten minutes notice.**
  - GRTs can (under general **supervision\***):
    - Perform a (basic) prescribed procedure below the dermis (e.g., ABGs, arterial line and IV insertions)
    - Intubate beyond the point in the nasal passages where they normally narrow or beyond the larynx
    - Suction beyond the point in the nasal passages where they normally narrow or beyond the larynx
    - Administer a substance by injection or inhalation
    - Utilize diagnostic ultrasound in RT practice
    - Perform a tracheostomy tube change [Note: it is the CRTO's position that a Member holding a Graduate Certificate of Registration cannot perform a tracheostomy tube change for a stoma that is less than 24 hours old].



# Conditions on a Graduate Certificate of Registration **Fact Sheet**

- In emergency situations (e.g., pandemics), “personally present” includes remote/virtual connections. For more information, please see the [Supervision Policy](#).

### **3. Not delegate a controlled act.**

- **Delegation\*\*** is the transfer of legal authority to perform a controlled act to a person not authorized to perform that controlled act.
- GRTs can NOT delegate any controlled acts to other individuals.

### **4. Not perform advanced prescribed procedures below the dermis.**

- GRTs can NOT perform any of the following advanced procedures:
  - o Manipulation or repositioning of a cannula balloon
  - o Chest needle insertion, aspiration, reposition and removal
  - o Chest tube insertion, aspiration, reposition and removal
  - o Bronchoscopic tissue sample for the purpose of bronchoalveolar lavage and endobronchial brushing
  - o Intraosseous needle insertion
  - o Subcutaneous electrode placement for interoperative and perinatal fetal monitoring.
- Procedures like ABGs, as well as arterial lines and IV insertions are basic procedures, which can be performed by GRTs provided the procedure is done under general supervision.

### **5. Not perform authorized act #5 “administering a prescribed substance by inhalation.”**

- GRTs can NOT independently initiate oxygen therapy as per authorized act #5 (administering a prescribed substance by inhalation).
- GRTs can still administer oxygen and other substances (e.g., bronchodilators) with a valid order from an authorized prescriber (e.g., physician) under general supervision.

### **6. A graduate certificate is deemed to have been revoked 18 months after its initial date of issue.**

- Graduate Certificates are temporary and can only be issued for 18 months. After 18 months, the GRT’s certificate of registration is revoked, and they are no longer members of the CRTO. Once revoked, a Graduate Certificate cannot be reissued.

- \* **Supervision** - GRTs require general (indirect) supervision to perform any controlled act. The supervisor must be a regulated health professional who is authorized to perform the procedure (for example, a Registered Respiratory Therapist or a physician). The supervisor does not need to be next to the GRT at all times, but they must be available in person within 10 minutes. An example of general supervision would be a GRT applying CPAP to a new patient while the supervising RRT is available in person within 10 minutes, to assist with the procedure. For more information regarding supervision, please review the [Supervision Policy](#).



# Conditions on a Graduate Certificate of Registration **Fact Sheet**

**\*\* Delegation** is the transfer of legal authority to perform a controlled act to a person not authorized to perform that controlled act. GRTs are not permitted to delegate controlled acts. Also, it is the CRTO's position that GRTs should not accept delegation for any controlled act. For example, a GRT working in a pulmonary function lab cannot accept delegation to implement the controlled act "Communicating to the individual or his or her personal representative a diagnosis...". GRTs require general supervision for the acts already authorized to RTs (listed above). It is in patients/clients' best interest for Graduate Members to first focus on developing their competencies in core areas of RT practice.

## Completion of the Health Professionals Testing Canada (HPTC) Exam

After a GRT Member successfully completes the Health Professionals Testing Canada (HPTC)<sup>1</sup> exam and submits a copy of their exam result to the CRTO. Staff will review their registration file and if eligible, the Member will be issued a General Certificate of Registration (RRT). Once the General Certificate is issued, the standard (GRT) conditions will be removed from the Member's certificate of registration.

## Resources

- [Registration and Use of Title Professional Practice Guideline \(PPG\)](#)
- [Terms Conditions and Limitations Fact Sheet](#)
- [Graduate Certificate of Registration Policy](#)
- [Interpretation of Authorized Acts PPG](#)
- [Delegation of Controlled Acts PPG](#)
- [Supervision Policy](#)

## Contact Information

**College of Respiratory Therapists of Ontario**

[www.crto.on.ca](http://www.crto.on.ca)

**Telephone:** 416-591-7800

**Toll-Free (in Ontario):** 1-800-261-0528

**General Email:** [questions@crto.on.ca](mailto:questions@crto.on.ca)

---

<sup>1</sup> Formerly the Canadian Board for Respiratory Care (CBRC)



## Q&As

---

**Question:** Why is a GRT permitted to ‘administer a substance by injection or inhalation’ but is **not** allowed to ‘administer a prescribed substance by inhalation’? What is the difference?

**Answer:** Authorized act # 4 “administering a substance by injection or inhalation” is an act that has been authorized to GRTs and RRTs via the [Respiratory Therapy Act](#) since 1991, but it requires that the Member first receives a valid order. This act applies to a wide variety of “substances” such as medical gases, medications, etc.

Authorized act # 5 (“administering a **prescribed** substance by inhalation”) is relatively new, with the term “prescribed” meaning the substance to be administered is ‘listed in a regulation’. The [Prescribed Substances Regulation](#) only authorizes Members holding General or Emergency Certificates of Registration (RRTs) to administer **therapeutic oxygen** by inhalation. In this case, there is no requirement for an order and an RRT may initiate, administer, titrate, and discontinue the oxygen independently, based on their own clinical judgement. It’s important to note that the ability to independently administer oxygen is subject to other legislation, namely the [Public Hospitals Act](#), as well as relevant organizational policies.

**Question:** If we hire a GRT to work for our home care company, can they visit clients on their own or do they need to have an RRT with them?

**Answer:** GRTs have several terms, conditions and limitations on their certificate of registration. One is that they may “only perform a controlled act that is authorized to the profession if it is performed under the general supervision of a member of a College”. This means that the GRT can be supervised by any regulated health care professional authorized to perform the controlled act with the competence to do so (including an RRT). In addition, the healthcare professional providing the supervision must have the ability to be **personally present** at the site where the authorized act is performed within **ten minutes notice**.

