



CANADIAN COUNSELLING AND
PSYCHOTHERAPY ASSOCIATION

L'ASSOCIATION CANADIENNE DE
COUNSELING ET DE PSYCHOTHÉRAPIE

The Canadian Counselling and Psychotherapy Association

**Submission to the House of Commons Standing Committee on Finance
2016 Pre-budget Consultations**

February 19, 2016

EXECUTIVE SUMMARY

Professional counsellors and psychotherapists are part of the primary health care continuum and make vital contributions to the mental health and well-being of Canadians. The Canadian Counselling and Psychotherapy Association (CCPA) calls on the federal government to remove barriers that impede access to timely mental health service and work towards strategies that increase the practice and training of health care professionals in the counselling and psychotherapy field. To that end, CCPA has prepared the following written submission for review and consideration by the House of Commons Standing Committee on Finance for inclusion in the 2016 federal budget.

ABOUT THE CANADIAN COUNSELLING AND PSYCHOTHERAPY ASSOCIATION

Established in 1965, CCPA is a national bilingual association representing the collective voice of over 5,600 professional counsellors and psychotherapists. CCPA provides its members with educational programs, certification, professional development and direct contact with professional peers and specialty groups. CCPA members provide mental health services to diverse populations in a variety of work settings across Canada.

CCPA promotes the profession and its contribution to the mental health and well-being of Canadians. As the leading association for counselling and psychotherapy in Canada, we strive to increase awareness about the role of the profession in all healthcare, educational and industry sectors. We know that critical investments in areas related to mental health and mental illness are vital for the overall health and wellness of all Canadians.

Mental illness affects one in five Canadians in their lifetime but despite the prevalence of mental health issues in the general population, people with mental health needs face multiple barriers accessing services (Health Canada, 2002¹). These barriers largely result from negative societal attitudes about mental illness and contribute to a lack of access to appropriate treatment and support services and difficulties obtaining employment and housing.

CCPA remains committed to collaborating with multiple organizations, associations, and alliances to promote mental health in Canada—ensuring access to the right care, provided by the right provider(s), to the right person, at the right time. Professional counsellors and psychotherapists are a crucial component of the primary health care continuum.

RECOMMENDATION 1

CCPA recommends that the federal government re-instate Canadian Certified Counsellors (CCCs) to the list of approved service providers for the FNIHB program in provinces currently working toward regulation.

A recent decision by Health Canada is gravely impacting access to mental health services for Indigenous populations. As of February 2015, Health Canada's First Nations Inuit Health Branch (FNIHB) Program and Indian Residential Schools Resolution Health Support Program (IRS RHSP) initiated a nationally standardized process to enroll mental health counselling providers across Canada. Health Canada will enroll only those mental health counselling providers registered with a legislated professional regulatory body and eligible for independent practice in the province/territory in which the service is being provided.

Consequently, it appears that Canadian Certified Counsellors (CCCs) have been removed from the list of providers in all provinces and territories where the profession of counselling/psychotherapy is not provincially regulated (British Columbia, Alberta, Saskatchewan, Manitoba, New Brunswick, Prince Edward Island, Newfoundland and Labrador, Yukon, Yellowknife, Nunavut). Only in exceptional circumstances, specifically rural and remote areas, can CCCs be accepted on a limited basis.

CCPA's CCC designation has been in existence since 1986. Certification through CCPA requires a Master's level degree including an extensive supervised field practicum. Because of the variable statutory regulation of the profession in Canada, CCPA has held high standards for counsellors and psychotherapists. It has an established Code of Ethics, Standards of Practice, Complaints Procedures, and a Continuing Education system. The removal of CCCs is severely affecting CCPA members in non-regulated provinces which in turn, is impacting citizens who desperately rely on appropriate mental health services from our CCCs.

Implementation of this recommendation has the potential to benefit Indigenous communities by providing greater access to much-needed mental health services. It would also support and help families and vulnerable individuals by focusing on an increasing availability of mental health services and expanding the number of mental health service providers. This will reduce wait times, increase early intervention thereby reducing the need for specialist care for preventable chronic conditions, and diminish stigmatization through treatment at the primary health care level and non-medical settings.

Our professional certified members need urgent action taken so they can be reinstated as approved providers; thus, helping to ensure appropriate, universal access to mental health counselling services for Indigenous peoples across the country.

RECOMMENDATION 2

CCPA recommends that the government ensure counsellors and psychotherapists are included in the continuum of care of mental health professionals approved to serve military, veterans and their families.

In December 2014, Health Canada announced a promise to provide mental health and wellbeing services to aid Canada's Armed Forces personnel, Veterans, and their families. This promised significant investment into military mental health services to help reduce the many barriers military personnel (serving and retired) and their families face in receiving these services and benefits. The CCPA has members that can assist in this endeavor.

Ensuring counsellors and psychotherapists are included with the government-approved service providers accessible to military, veterans and their families, will have a significant positive economic impact as well as increase access overall to those most in need.

Given the shortage of mental health services across Canada and the increasing cost of health care, it is critical that at this juncture we utilize the most appropriately trained mental health professionals across the continuum of care, either as individual practitioners or as members of multi-disciplinary teams.

From an economic perspective, counsellors and psychotherapists typically charge between \$80 and \$120 for an individual session of approximately 50 minutes. In comparison, rates for psychologists for the same duration range from \$140 - \$220 (Peachey et al., 2013)². As medical doctors, psychiatrists

would be paid significantly more. Given this disparity in fees, by utilizing the services of counsellors and psychotherapists to address mental health issues for which they are fully competent and qualified, a significant cost savings could be realized.

Wait times for mental health services are a considerable problem, with potentially negative consequences for those seeking help. Expanding service to include counsellors and psychotherapists for military, veterans and their families will result in greater access to much needed mental health care. By adding a much needed and fully qualified resource to the mental health care continuum, wait times will be reduced and early intervention increased.

RECOMMENDATION 3

CCPA recommends that mental health counselling services be classed as zero-rated for HST/GST to ensure a level playing field with other mental health care providers.

The established designations of: Canadian Certified Counsellors (CCC [pan-Canadian]), Registered Clinical Counsellors (RCC [British Columbia]), Registered Counselling Therapists (RCT [Nova Scotia]), conseiller/conseillère d'orientation (c.o. [Quebec]), holders of the Psychotherapy Permit in Quebec (Bill 21) and Registered Psychotherapists (RP [Ontario 2013]) are certified credentials held by professionals qualified to provide mental health counselling services.

There is a belief that mental health services are exempt from HST. This is untrue as it depends on the provider of the service as to whether the service is exempt, not the nature of the service itself. GST/HST across the provinces and territories varies from 5% to 15%, an additional cost which provides unequal access to services by those Canadians who seek care by qualified providers such as mental health counsellors and psychotherapists.

At present, professionals with an overlapping scope of practice with mental health counsellors and psychotherapists include physicians, psychiatrists, registered nurses, registered psychiatric nurses, psychologists, occupational therapists and social workers. Their services are either covered under public funds or third party health care plans, exempt from HST. The clients of counsellors and psychotherapists are at a disadvantage in that the services are not exempt from the HST. In the interest of fairness and universal accessibility, the services of counsellors and psychotherapists should also be tax exempt or preferably, 0-rated.

The tax applied to these mental health services from counsellors and psychotherapists may cause Canadians to reduce the frequency with which they seek these services. The long-term effect will be that those needing mental health services will either seek help from within the publicly funded healthcare system which is under tremendous cost pressure, or will not seek the help at all.

RECOMMENDATION 4

CCPA recommends that the loan forgiveness program be extended to university graduates of counselling programs, providing incentives for graduates to work in rural areas, remote and northern regions of Canada.

Initiatives such as the student loan forgiveness program for physicians and nurses or tuition rebate programs can be extended to university graduates of counselling programs. The program could

encourage Canadians to obtain the competencies necessary for the increased need for mental health-related jobs of tomorrow while encouraging foreign- and alternatively trained professionals to select Canada as a place of opportunity.

When there is an associated increase in qualified personnel in high demand jobs in rural, remote and northern communities in addition to an increased number of individuals interested in entering the profession, the result is increasing access and reducing waiting times for healthcare.

A lack of financial support is a significant obstacle in recruiting new mental health counsellors to rural, remote and northern areas. In order to increase productivity in Canada and ensure that all Canadians have access to quality health care, counsellors and psychotherapists should be included in existing and new incentive programs aimed at recruiting and retaining health care professionals in Canada's rural, remote and northern communities.

By relying more heavily on counsellors and psychotherapists for mental health care of groups for which the federal government has direct fiduciary responsibility, hiring of new employees is encouraged and healthcare businesses begin to flourish. The more that this recommendation is expanded and the more money that is saved, the more funding will be available to provide incentives for graduates to work in rural, remote and northern communities in Canada.

Implementation of this measure would increase the accessibility of mental health services. Through the expansion of qualified mental health service providers wait times could be reduced, thereby increasing the role of early intervention, and subsequently, reducing the need for specialist care for preventable chronic conditions.

SUMMARY OF RECOMMENDATIONS

Given the importance of mental health to all Canadians and the presence of mental illness nation-wide, **CCPA recommends that dedicated and targeted investments be provided for better and more equitable access to mental health services.** All Canadians would benefit from better access to mental health services. Therefore, CCPA recommends the following be included in the 2016 federal budget:

- 1. CCPA recommends that the federal government re-instate Canadian Certified Counsellors (CCCs) to the list of approved service providers for the FNIHB program in provinces currently working toward regulation.**
- 2. CCPA recommends that counsellors and psychotherapists be included in the continuum of care of mental health professionals to serve military, veterans, and their families.**
- 3. CCPA recommends that mental health counselling services be taxable at 0% HST/GST to ensure a level playing field with other mental health care providers.**
- 4. CCPA recommends that the loan forgiveness program be extended to university graduates of counselling programs, providing incentives for graduates to work in rural areas, remote and northern regions of Canada.**

References

1. Health Canada. (2002). A Report on Mental Illnesses in Canada. Ottawa: Health Canada.
<http://www.phac-aspc.gc.ca/publicat/miic-mmacc/index-eng.php>

2. Peachey, D., Hicks, V., & Adams, O. (2013). *An Imperative for Change: Access to Psychological Services for Canada*. Ottawa: Canadian Psychological Association.