



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
2017 Pre-budget Consultations**

August 5, 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) wants to support and assist the federal government in removing barriers that impede access to timely mental health services. CCPA is also committed to job creation and economic growth by implementing strategies that will 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 2017 federal budget.

In order to help the Government in their promise to promote new mental health policies, CCPA recommends the following be included in the 2017 federal budget:

1. CCPA recommends that the federal government reinstate Canadian Certified Counsellors (CCCs) to the list of approved service providers for the FNIHB program in provinces currently working toward regulation of the profession of counselling and psychotherapy.
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.

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, 2012¹). 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. To this end, CCPA makes the following four recommendations:

RECOMMENDATION 1

CCPA recommends that the federal government reinstate Canadian Certified Counsellors (CCCs) to the list of approved service providers for the First Nations Inuit Health Branch 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. As a result, 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.

The implementation of our recommendation would 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.

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.

CCPA is committed to improving the mental health of Indigenous peoples in Canada and continually strives to find ways to help meet needs in the area of holistic health and wellbeing. CCPA's Indigenous Circle Chapter (ICC) provides an Indigenous voice in the Association—raising awareness and creating a network for Indigenous and non-Indigenous counsellors to work together on issues that affect Indigenous clients, families, and communities. The ICC provides opportunities for members to share effective practices and resources so that networks can build and expand upon collective knowledge in an Indigenous context and contribute to the evolution of this field within mental health.

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.

Ensuring counsellors and psychotherapists are included with the government-approved service providers accessible to military, veterans and their families, will have a significant positive impact both socially and economically. Given the shortage of mental health services across Canada and the increasing cost of health care, it is critical that we utilize the highly qualified mental health care providers that we already have in place.

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.

From a financial 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 difference in fees, by utilizing the services of counsellors and psychotherapists to address mental health issues for which they are fully competent and qualified, there would be a significant cost savings.

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.

There is a belief that mental health services are exempt from HST. This is untrue; the exemption is variable. The variation 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 and unequal costs associated with 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, both of which are exempt from HST. The clients of counsellors and psychotherapists are disadvantaged by the addition of HST to the service delivery costs.

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. In the interest of fairness and universal

accessibility, the services of counsellors and psychotherapists should also be tax exempt or preferably, 0-rated.

When we reduce the costs paid by Canadians for counselling, which is usually out-of-pocket, we reduce one of the barriers to accessing mental health services. The tax that is being applied to these mental health services when they are delivered by counsellors and psychotherapists may cause Canadians to reduce the frequency with which they seek these services. The effect will be that those needing mental health services who cannot afford increased costs due to the additional burden of HST/GST will either languish without treatment, remain on lengthy waiting lists as their mental health potentially deteriorates, 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 for physicians and nurses be extended to university graduates of counselling programs, providing incentives for graduates to work in rural areas, remote and northern regions of Canada.

The federal government has taken steps to attract and retain other health professionals in these communities, but it has not extended similar programs to university graduates of counselling programs. Doctors, nurse practitioners, and nurses have a portion of their Canada Student Loans forgiven by the government as an incentive to practice in underserved communities. CCPA recommends the expansion of the loan forgiveness to recent graduates of counselling and psychotherapy programs. The government could also consider grants, scholarships and bursaries in exchange for a 3- or 4-year return-of-service commitment, wage incentives or a guaranteed minimum income, and/or tax credits for practicing in remote areas. These incentives would encourage counsellors to move to locations where their skills are needed most.

The loan forgiveness program or similar incentives would encourage Canadians to obtain the competencies necessary for the high demand for mental health-related jobs of tomorrow while encouraging foreign and alternatively trained professionals to select Canada as a place of opportunity. Substantial employment opportunities exist for counsellors in rural, remote, and northern regions of the country, and especially in First Nations and Inuit communities.

Implementation of this measure would increase the accessibility of mental health services, an important and necessary initiative the government has said it will undertake. The expansion of qualified mental health service providers will reduce wait times, thereby increasing the role of early intervention, and reduce the need for specialist care for preventable chronic and intractable conditions.

References

1. Mental Health Commission of Canada (2012). *Changing directions, changing lives: The mental health strategy for Canada*. Calgary: MHCC. <http://strategy.mentalhealthcommission.ca/pdf/strategy-images-en.pdf>
2. Peachey, D., Hicks, V., & Adams, O. (2013). *An Imperative for Change: Access to Psychological Services for Canada*. Ottawa: Canadian Psychological Association.