

Written Submission for the
Pre-Budget Consultations
in Advance of the Upcoming
2022 Federal Budget



CANADIAN COUNSELLING AND
PSYCHOTHERAPY ASSOCIATION

L'ASSOCIATION CANADIENNE DE
COUNSELING ET DE PSYCHOTHÉRAPIE



Recommendation 1: CCPA recommends that the Federal Government permanently include counsellors/psychotherapists/counselling therapists as an eligible expense in the Public Service Health Care Plan, extending the Government's temporary measure.

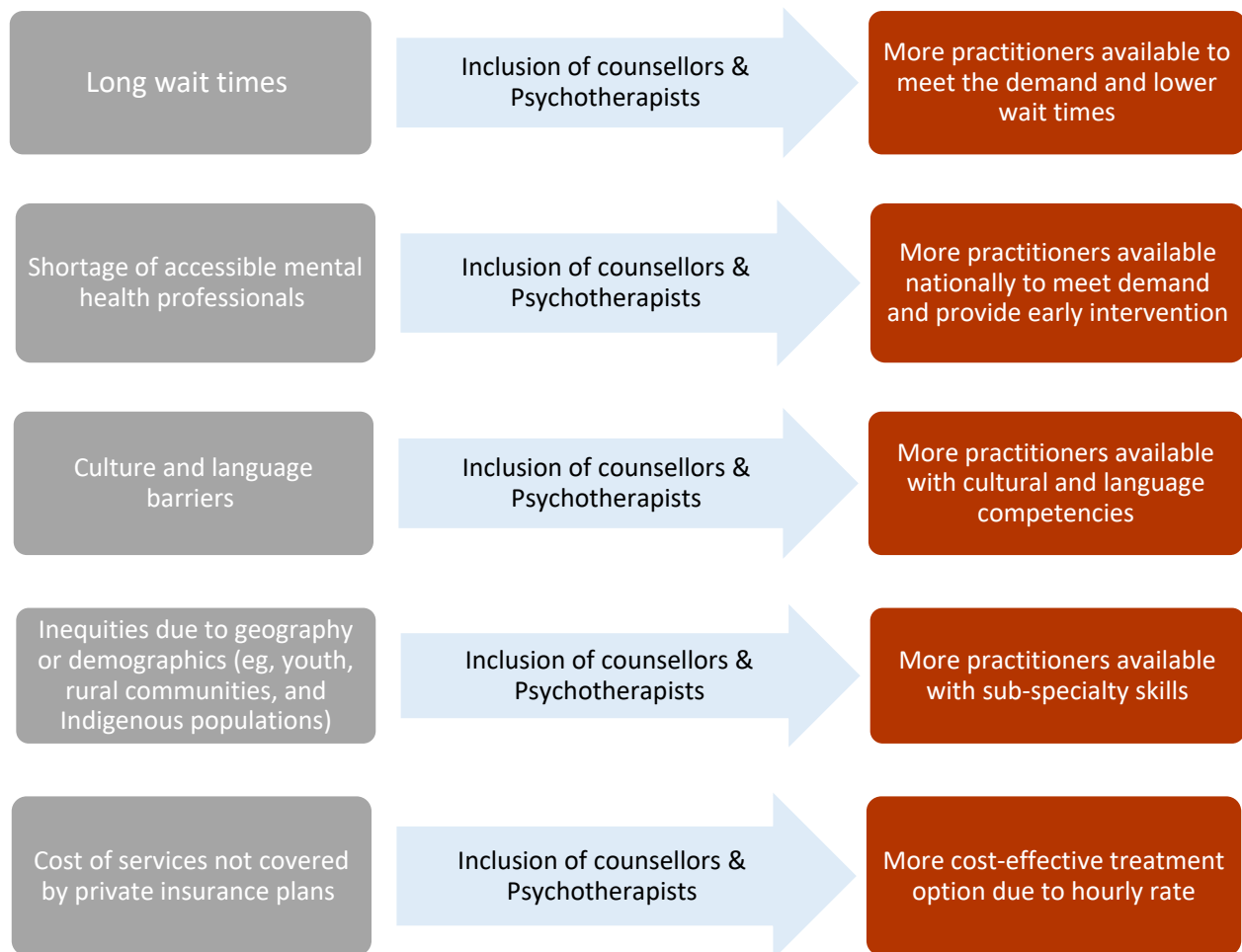
Recommendation 2: CCPA recommends that the federal government re-instate Canadian Certified Counsellors (CCCs) to the list of approved service providers for the Non-Insured Health Benefits Program for First Nations and Inuit in provinces currently working toward regulating the counselling/psychotherapy profession.

Recommendation 3: CCPA recommends that counselling and psychotherapy services be exempted from HST/GST, thus providing Canadians with better access to one of the most cost-effective mental health care options available.

Background

The Canadian Counselling and Psychotherapy Association (CCPA) is a national bilingual association representing the collective voice of approximately 9,700 professional counsellors and psychotherapists. We call on the federal government to uphold their commitment to the Common Statement of Principles on Shared Health Priorities by revising policies that limit Canadians' access to counsellors and psychotherapists in federal health programs.

Canada's mental health care system was strained before the pandemic; an estimated 5.3 million Canadians reported they needed help for their mental health in 2017, but of these, 43% (2.3 million) reported that their mental health needs were only partially met or fully unmetⁱ. The need for counselling was the most likely to be unmet (34%). Improving access to counsellors and psychotherapists would address a significant number of barriers identified in this study:



Four provinces have regulated the profession of counselling and psychotherapy in the last decadeⁱⁱ, while two more have passed legislation to regulate the professionⁱⁱⁱ. CCPA continues to support regulationⁱⁱⁱ in the remaining provinces and territories. In provinces that have yet to regulate the profession, CCPA's Canadian Certified

Counsellor (CCC) designation provides recognition that counsellors and psychotherapists in unregulated provinces meet the national standard for professional training, ethics, and ongoing education.

Federal health benefit programs and legislation are impacted by the evolving counselling and psychotherapy regulatory landscape because

- 1) there is a misconception that the counselling and psychotherapy professions differ because they use different titles, when in actuality they are the same profession with a shared scope of practice and licensure requirements, and
- 2) not all provinces are regulated, and while some federal health benefit programs will recognize the services of certified counsellors and psychotherapists in unregulated provinces, others will exclude them as eligible service providers.

These regulatory factors have contributed to inequalities and inconsistencies in Canadians' ability to access timely, effective, and qualified mental health care support provided by counsellors and psychotherapists through federal health benefit programs and legislation such as the Excise Tax Act.

Despite these barriers, various federal mental health care plans recognize counsellors and psychotherapists from both regulated and unregulated provinces, including the Veterans Affairs health plan for retired military and RCMP members, and the Public Service Health Care Plan (PSHCP) for members of the Federal Public Service and their dependents. The Government of Canada also employs CCPA's Canadian Certified Counsellors (CCCs) nationwide in various federal Employee Assistance Programs (EAPs), and counsellors and psychotherapists are part of the therapy providers in the Wellness Together Canada program.

Other federal plans, however, only recognize those counsellors and psychotherapists from regulated provinces, such as the Interim Federal Health Program (IFHP), Non-Insured Health Benefits Program (NIHB) and the Indian Residential Schools Resolution Health Support (IRS RHS) Program. Without consistently recognizing qualified counsellors and psychotherapists in all federal plans and provinces, this leads to preventable delays in obtaining mental health support, inequality in access to care based on province of residence, and lack of continuity of care as clients transition from one federal plan's coverage to another or from one province to another.

CCPA recommends three legislative and easily actionable ways that the Federal Government can ensure consistency in federal recognition of counsellors and psychotherapists and prevent avoidable gaps in the accessibility of federal mental health supports.



Recommendation 1: CCPA recommends that the Federal Government permanently include counsellors / psychotherapists / counselling therapists as an eligible expense in the Public Service Health Care Plan, extending the Government's temporary measure.

The Public Service Health Care Plan (PSHCP) is one of the largest private health care plans in Canada. Before the pandemic, 50% of all approved claims under the Public Service Health Care Plan (PSHCP) fell under the category of mental health.

In 2016, the Government of Canada adopted the Federal Public Service Workplace Mental Health Strategy, where the Government recognizes that “the Federal Public Service has an essential leadership role to play in supporting the mental health of its employees”. However, the plan did not recognize counsellors and psychotherapists as eligible mental health providers.

The Pulse Survey on COVID-19 and its Impacts on Statistics Canada Employees (PSCISCE) recognized that many public service employees have experienced major changes in their work and lifestyle as a result of the pandemic, and found that 54% of federal public servants sampled reported their mental health as “poor” or “fair” since the COVID-19 pandemic.^{iv}

On April 24th, 2020 the Treasury Board Secretariat announced temporary changes to recognize counsellors and psychotherapists as mental health practitioners in the Public Service Health Care Plan (PSHCP) to improve access to care during the COVID-19 pandemic. This temporary inclusion was nationwide: it applied to practitioners licensed in regulated provinces as well as certified through CCPA in unregulated provinces.

Plan members who are working with a counsellor/psychotherapist under this temporary measure will establish a therapeutic relationship with their mental health practitioner. If the temporary inclusion is removed, it could have detrimental impacts on the mental health of over 700,000 Federal Public Servants and their eligible dependents, and would place an increased strain on the already over-burdened public healthcare system. It would present plan members with an undue and unfair challenge, and would force them to either stop receiving treatment, pay out of pocket to continue with their current provider, or transition to a new practitioner, entering the often long wait system to eventually begin their treatment with someone new.

Increasing the accessibility and affordability of appropriate mental health services across Canada is vital to the success of our country. We strongly urge the government to extend this measure permanently to ensure a healthy and productive workforce and address the long-term needs of plan members.

This recommendation could be implemented through the Treasury Board Secretariat and the National Joint Council's Public Service Health Care Plan Partners Committee under the PSHCP Medical Practitioners Benefit.



Recommendation 2: CCPA recommends that the Federal Government re-instate Canadian Certified Counsellors (CCCs) to the list of approved service providers for the Non-Insured Health Benefits Program for First Nations and Inuit in provinces currently working toward regulating the counselling/psychotherapy profession.

There is a significant need for improved access to qualified professional mental health support for the Indigenous Peoples of Canada. Attempts at assimilation have contributed to mental health challenges for First Nations, Inuit, and Métis peoples, which, in turn, have led to harm in Indigenous communities. The loss of their culture, identity and self-determination has had profound and lasting impacts on their mental well-being.

The Non-Insured Health Benefits Program (NIHB) and the Indian Residential Schools Resolution Health Support (IRS RHS) Program provide registered First Nations and recognized Inuit with coverage for a range of health benefits, including mental health counselling. The NIHB mental health benefit is the largest-growing area in the NIHB plan, growing more than all other benefit areas combined. While Indigenous Peoples are more than twice as likely to seek professional help for mental health concerns as non-Indigenous Canadians, the NIHB and IRS RHS programs unfortunately do not provide equitable access to mental health care for all Indigenous Peoples across Canada.

CCPA's Canadian Certified Counsellors (CCCs) were eligible service providers under NIHB and Indian Residential Schools Resolution Health Support (IRS RHS) programming until May 2015 when the designation was delisted in all provinces and territories where the profession of counselling and psychotherapy is not regulated. Health Canada decided at the time that only in exceptional circumstances, specifically rural and remote areas, would CCCs be accepted and on a limited basis. This decision has significantly reduced appropriate, universal access to mental health counselling services for Indigenous Peoples and communities across the country, and disadvantages those requiring care in unregulated provinces and territories.

In comparison, First Nations Health Authority (FNHA) in British Columbia, who, since 2013 has held responsibility for the First Nations programs and services in the province which were formerly delivered by Health Canada, includes CCCs as eligible providers.

In September 2015, in response to the delisting of CCCs in unregulated provinces, the Assembly of First Nations (AFN) - First Nations Inuit Health Branch (FNIHB) NIHB Joint Review Steering Committee recommended immediately reinstating CCCs as eligible providers in provinces and territories that have not regulated the profession. However, this call to action was never implemented.

In the interest of equitable accessibility to mental health services for Indigenous Peoples of Canada, it is recommended that Indigenous Services Canada implement the call to action from the AFN-FNIHB Joint Review Steering Committee and immediately reinstate CCCs in unregulated provinces as eligible providers under the NIHB program.



Recommendation 3: CCPA recommends counselling and psychotherapy services be exempted from GST/HST, thus providing Canadians with better access to one of the most cost-effective mental health care options available.

Some, but not all mental health providers are exempt from GST/HST for psychotherapy services. At present, physicians, psychiatrists, registered nurses, registered psychiatric nurses, psychologists, occupational therapists, and social workers are exempt from charging GST/HST on psychotherapy services. Counsellors and psychotherapists are notably absent from the list of eligible providers who are exempt from charging GST/HST on psychotherapy services.^v

The profession is not currently exempt because the Department of Finance does not accept that counsellors and psychotherapists with different titles are providing the same service and have a shared scope of practice (with regulatory requirements that align with those of CCPA's CCC designation in unregulated provinces).

This exclusion of counsellors and psychotherapists from the GST/HST exemption means that the clients of counsellors and psychotherapists face an added financial barrier when accessing mental health support from these qualified practitioners. In the interest of universal accessibility and fairness, the services of counsellors and psychotherapists should also be tax exempt.

The Federal Government should provide GST/HST exemption to counselling and psychotherapy services by either recognizing the shared scope of practice of the profession across Canada despite differing professional titles, adding it within the list of GST/HST exempt health care services under Part II section 7 of the Excise Tax Act, and/or amending the regulations pursuant to this Act within Prescribed Health Care Services section 10 of Part II of Schedule V.

This recommendation would seamlessly complement the government commitment, made in Budget 2019, to expand the list of GST/HST exempt health care services to include multidisciplinary health care services.



ⁱ Moroz, N., Moroz, I., & Slovynec D'Angelo, M. (2020). *Mental health services in Canada: Barriers and cost-effective solutions to increase access*. <https://journals.sagepub.com/doi/full/10.1177/0840470420933911>

ⁱⁱ **Quebec** (Conseille(è)re d'orientation psychothérapeute, Orienteur psychothérapeute, Orienteur professionnel psychothérapeute, Guidance counsellor psychotherapist, Vocational Guidance Counsellor; <https://www.ordrepsy.qc.ca/psychotherapeutes>),

Ontario (Registered Psychotherapist <https://www.crpo.ca/>),

Nova Scotia (Counselling Therapist; <https://nscct.ca/>),

New Brunswick (Licensed Counselling Therapist, Licensed Career Counsellor, Registered Career Counsellor, Registered Counselling Therapist; <https://cctnb.ca/>)

ⁱⁱⁱ **PEI** (August 1st: Counselling Therapist, <https://www.ccpa-accp.ca/prince-edward-island-regulation/>), and

Alberta (TBD: Counselling Therapist, <https://www.acta-alberta.ca/>) and

^{iv} Statistics Canada (2021). *Pulse Survey on COVID-19 and its Impacts on Statistics Canada Employees (PSCISCE)* <https://www.statcan.gc.ca/eng/survey/household/5326>

^v Canada Revenue Agency (2015). *Excise and GST/HST News – No 97*. <https://www.canada.ca/en/revenue-agency/services/forms-publications/publications/news97/news97-excise-gst-hst-news-no-97.html>