
Submission to the House of Commons
Standing Committee on Health (HESA) study on

Children's Health

The Canadian Counselling and Psychotherapy Association

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The Canadian Counselling and
Psychotherapy Association
(CCPA)

CCPA is a national bilingual association representing the collective voice of over 11,000 professional counsellors, counselling therapists 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.



Mental health challenges and illnesses are significantly affecting Canadian children

An estimated 1.2 million children and youth in Canada were affected by mental illness in 2019, yet less than 20% received appropriate treatment[1]. According to Statistics Canada[2], while parents of older children were more likely to report poor mental health in their children than parents of younger children, self-report by older children indicated that parents were significantly under-reporting their children's mental health struggles. Furthermore, results indicated that in almost half of the cases (48%), there was correlation between the parent and youth's mental health status. Canadian families are clearly facing systemic and intergenerational mental health challenges, and these figures indicate that by the time parents are aware and prepared to support their child's mental health needs, their child's mental health has deteriorated farther than they realise.

The pandemic has understandably strained children's mental health through increased stress responses to a challenging and unprecedented situation, mitigated by caregiver stress responses and lack of access to programs and supports that can provide protection and support. Over half of Canadian children aged eight to 12 years old and 70% of adolescents reported clinically significant depressive symptoms during the second wave of the pandemic[3]. Across six domains of mental health, 70.2% of school-aged children and 66.1% of pre-school aged children reported deterioration in at least one domain[4]. Experiencing these mental health impacts during critical biopsychosocial development periods may have long-term consequences on their mental health and overall well-being.



Children in Canada are struggling to access mental health support

Children's Mental Health Ontario estimates that 28,000 children and youth were waiting for mental health care prior to the pandemic, some as long as 2.5 years, and identifies the inability to meet growing demand as a significant factor in the inability to meet this need[5]. After the first few months of the pandemic, Kids Help Phone reported twice as many interactions across Canada compared with the year prior[6]. In our own study, in partnership with the Vanier Institute of the Family and Canadian Association of Marriage and Family Therapists, child and family therapists were nearly twice as likely to report taking on a typical weekly caseload of 25 clients or more after the start of the pandemic than prior to the pandemic (considered to be beyond a full-time caseload in the field).[7]

There is a clear desire for help and support, but our system is failing these children and families.

Children's mental health is deteriorating waiting for meaningful mental health support in their community, and as a result, are increasingly turning to urgent care. The Canadian Institute for Health Information (CIHI)[8] indicates that the proportion of hospitalizations for mental health disorders is also on the rise. In 2020, nearly one in four child hospitalizations were for mental health conditions. During some peak surges amid the pandemic, children's hospitals reported half of all admissions were related to a mental health issue and the demand was so great that they were forced to turn to adult hospitals to help manage the surge in mental health care cases presenting in urgent care[9]. More than a quarter of the children hospitalized for all mental health conditions lived in the least affluent neighbourhoods, however one third of those hospitalized for eating disorders lived in the most affluent neighbourhoods. [8]



More practitioners are necessary to meet the growing demand for children's mental health services

Long wait times are indicative of how the demand for services outweighs the capacity for providers to provide these services.



A 2021 survey[10] conducted by the Canadian Health Workforce Network and Mental Health Commission of Canada found that 43% of the broader mental health and substance use workforce (comprised of nurses, psychiatrists, psychologists, counsellors, psychotherapists and more) had a decrease in their availability or ability to provide services since the start of the pandemic.

However, regulated mental health therapists such as counselling therapists and psychotherapists had the biggest increase in capacity and were 3.5 times more likely to report increased capacity than nurses and 2 times more likely than psychologists.

More practitioners would serve to address children's mental health needs through improved access to mental health services that provide:



A greater likelihood of finding a therapist of good fit (including cultural and linguistic needs) in order to improve treatment outcomes



Early and evidence-based intervention to decrease symptom severity and treat mental health concerns



Decreased strain on the health care system



Monitoring for other clinical needs such as diagnosis and medical care



Suicide assessment and intervention

Strengthening Canada's mental health care supports by increasing the number of available providers is essential to pandemic recovery and to a thriving and healthy society. Despite health care being a provincially regulated matter, there are small and actionable yet impactful federal policies and legislation that can be addressed in order to improve supply and access to qualified mental health care providers in Canada.

Counsellors/psychotherapists are part of the continuum of mental health care providers available to meet the mental health care needs of children and families,

but the added GST/HST surcharge on their services contributes to barriers in access to care.

The profession of counselling therapy/psychotherapy meets the threshold for tax exemption in the Excise Tax Act because it is regulated in five provinces. However, because the profession does not regulate the same title in all five provinces, the Department of Finance does not accept that counselling therapists and psychotherapists are the same profession and meet the minimum threshold of regulation in five provinces.

At present, a number of health providers (physicians, psychiatrists, registered nurses, registered psychiatric nurses, psychologists, occupational therapists, and social workers) are exempt from charging GST/HST on psychotherapy services, except for counselling therapists and psychotherapists themselves, who are specialists in this practice. In the interest of universal accessibility to mental health practitioners, the services of counselling therapists and psychotherapists should also be tax exempt.

We call on the House of Commons Standing Committee on Health (HESA) to recommend that the Federal Government amend the Excise Tax Act in the 2022 Fall Economic Statement to ensure that the profession of counselling therapy and psychotherapy are exempt from GST/HST alongside other regulated mental health care practitioners.



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