



CANADIAN COUNSELLING AND
PSYCHOTHERAPY ASSOCIATION

L'ASSOCIATION CANADIENNE DE
COUNSELING ET DE PSYCHOTHÉRAPIE

SUBMISSION TO THE HOUSE OF COMMONS STANDING COMMITTEE ON FINANCE

2018 PRE-BUDGET CONSULTATIONS

EXECUTIVE SUMMARY

The Canadian Counselling and Psychotherapy Association (CCPA) supports the federal government in its efforts to increase productivity and competitiveness in Canadian businesses and the Canadian economy. CCPA believes that the key to any successful business is its workers and by ensuring that employees are happy and healthy, businesses can maximize their productivity and competitiveness.

CCPA believes resolving certain barriers will assist the federal government in its desire to improve productivity. As a result, CCPA recommends that the following items be added to the 2018 federal budget:

1. CCPA recommends that the federal government re-instate Canadian Certified Counsellors (CCCs) to the list of approved service providers for the First Nations Inuit Health Branch (FNIHB) program in provinces currently working toward regulation.
2. CCPA recommends that the federal government include counsellors/psychotherapists as an eligible expense in the *Public Service Health Care Plan*.
3. CCPA recommends that mental health counselling services be classed as zero-rated for the HST/GST thus allowing Canadians access to affordable professional counselling, while also ensuring counsellors have a level playing field with other mental health care providers.
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.

ABOUT THE CANADIAN COUNSELLING AND PSYCHOTHERAPY ASSOCIATION

CCPA is a national bilingual association representing the collective voice of over 6,200 professional counsellors and psychotherapists. CCPA promotes the profession and its contribution to the mental health and well-being of Canadians. CCPA acknowledges that critical investments in areas related to mental health and mental illness are vital for the general welfare of all Canadians, particularly given that mental illness will impact one in five individuals in their lifetime. Despite the prevalence of mental health issues in the general population, people with mental health needs face multiple barriers accessing services

(Health Canada, 2012) ¹. These barriers, in turn, result in adverse consequences for the Canadian economy.

By addressing the most pressing barriers to mental health and illness services, the federal government can help improve the productivity and competitiveness for businesses and the Canadian economy by implementing the following four recommendations.

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.

In 2015, Canadian Certified Counsellors (CCCs) were removed from the list of approved providers for Health Canada's First Nations Inuit Health Branch (FNIHB) Program and Indian Residential Schools Resolution Health Support Program (IRS RHSP) in all provinces and territories where the profession of counselling/psychotherapy is not regulated. Only in exceptional circumstances, specifically rural and remote areas, can CCCs be accepted on a limited basis. This decision has significantly reduced appropriate, universal access to mental health counselling services for Indigenous peoples across the country.

The implementation plan of the AFN-NIHB Joint Review Steering Committee includes an action (Action #9) specific to this recommendation:

- National counselling/therapy practicing bodies, such as the Canadian Certified Counsellors (CCCs), in provinces and territories that have not regulated the profession be immediately reinstated as eligible service providers.

CCPA expresses its support for and offers its assistance with the implementation of this AFN-NIHB action.

Further, this recommendation could be actioned by accessing the funds listed in Table 3.1 on page 164 of Budget 2017 which proposed new funding for the NIHB program as part of the First Nations and Inuit Health Investments (Department of Finance, 2017) ².

Reinstating CCCs in non-regulated provinces 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.

RECOMMENDATION 2

CCPA recommends that the federal government include counsellors/psychotherapists as an eligible expense in the *Public Service Health Care Plan*.

Ensuring counsellors and psychotherapists are included as approved service providers accessible to federal public service employees will increase access overall to those in need and have a significant positive economic impact as well.

Given the shortage of mental health services across Canada and the increasing cost of health care, it is critical that 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. 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 federal public service employees 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.

Rates for psychologists for an individual session of approximately 50 minutes can range from \$140 - \$220. In comparison, counsellors and psychotherapists typically charge between \$80 and \$120 for the same duration (Peachey et al., 2013)². Given the difference in fees, the inclusion of access to counsellors and psychotherapists for all federal government employees would represent a substantial financial relief and ensure access to affordable mental health support from competent and qualified professionals. 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.

RECOMMENDATION 3

CCPA recommends that mental health counselling services be classed as zero-rated for the HST/GST thus allowing Canadians access to affordable professional counselling, while also ensuring counsellors have a level playing field with other mental health care providers.

Not all mental health services are exempt from the HST/GST. 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%, which is a significant additional cost that hurts accessibility for those Canadians seeking care by qualified providers such as mental health counsellors and psychotherapists.

At present, physicians, psychiatrists, registered nurses, registered psychiatric nurses, psychologists, occupational therapists and social workers 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/GST to the service delivery costs.

In the interest of universal accessibility and fairness, the services of counsellors and psychotherapists should also be tax exempt or preferably, zero-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 the 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 communities outside of urban centres, 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 programs to recent graduates of counselling and psychotherapy programs. The federal 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 and services are needed most.

CONCLUSION

CCPA appreciates the opportunity to submit its proposals for the 2018 Budget. Should there be interest in learning more about mental health issues and the impacts said issues have on productivity, CCPA would **like to request** the opportunity to appear in-person before the Standing Committee on Finance in the fall.

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. Department of Finance (2017). *Budget 2017*, Table 3.1. "Budget 2017 First Nations and Inuit Health Investments". Ottawa: Government of Canada.
3. Peachey, D., Hicks, V., & Adams, O. (2013). *An Imperative for Change: Access to Psychological Services for Canada*. Ottawa: Canadian Psychological Association.