

August 31, 2022

To:

Honourable Jason Copping, Minister of Health

Honourable Mike Ellis, Associate Minister of Mental Health and Addictions

Sent by email to: health.minister@gov.ab.ca & AssociateMinister-MHA@gov.ab.ca

Re: Employer Support for Regulation of the Counselling Professions

We are writing to express our serious concerns about the continued delays in regulating the counselling professions.

We are community-based counselling organizations that provide critical mental health services to Albertans. We employ and contract counselling therapists to provide these services.

We support the regulation of the counselling professions and ask you to immediately proclaim the legislation to create the College of Counselling Therapy of Alberta (CCTA). We have prepared for the CCTA to open and the continued stalling is causing negative workforce issues, preventing Albertans' access to affordable services, and most importantly, keeping Albertans unnecessarily at risk. We do not see professional regulation as "red tape." Professional regulation is about public safety and increases access to safe services.

From an employer's perspective, stalling regulation for counselling therapists has created serious problems, including:

- Stalling regulation is restricting the mental health and addiction workforce: There are not nearly enough regulated practitioners in Alberta to meet the demand for mental health and addiction counselling services.
- Stalling regulation prevents us from being able to address long waitlists for mental health and addiction services: We are experiencing an unprecedented demand for counselling services. The shortage of regulated counselling professionals makes it more difficult to meet the demand and provide the help that is desperately needed. For Indigenous clients, it can be even more difficult to connect those in need with providers. Programs that cover services for Indigenous people, such as NIHB, require that therapy be provided by a regulated practitioner only. Even when providers with culturally appropriate training and experience are available, we cannot provide the service due to the lack of regulation.
- Stalling regulation is preventing access to safe services: All clients deserve health services from practitioners that are held to standards of safety and competence. Only a College can provide this assurance to the public. The onus should not be solely on employers or clients to ensure a provider has the necessary education and training. There are 29 health professions that are regulated, including psychologists. Counselling

professionals should also be regulated under a college, as the same risk for harm exists.

- Stalling regulation limits a client's autonomy in choosing a practitioner that will best meet their needs. Mental health services are more effective when clients can access services that are a good 'fit' for them. When clients choose counselling therapists who are not regulated, they are unable to access their insurance coverage for the services. Many other employer and government plans that cover mental health services also require regulated practitioners. Clients under these plans are limited to a smaller pool of providers, and sometimes unable to find a provider at all.
- Stalling regulation is draining Alberta's qualified workforce: Qualified therapists are leaving Alberta for other jurisdictions where the counselling profession is regulated. This is an unnecessary hardship at a time when we need all hands on deck to address the mental health and addiction crisis in Alberta. The last thing we need is for qualified, safe and competent practitioners to be leaving Alberta.

As an employer/contractor for mental health services in Alberta, we see many benefits to regulating counselling therapists:

- Regulation will provide safety for our clients: With regulation, we will be assured that our therapists are held to minimum standards of competence, and held to a mandatory code of ethics by a College. They will be required to keep up their competence through continuing competence programs, and will be held to all other minimum safety standards in the *Health Professions Act* and other legislation.
- Regulation will increase access to affordable services: Clients will be able to access their benefits for a broader range of services from regulated providers. There will be a larger pool of regulated providers to provide services for government funded programs such as NIHB.
- Regulation will help address the long waitlists for services at no extra cost to employers or the government: There are thousands of counselling professionals in Alberta who are currently unregulated. With regulation, we will have the ability to employ and contract significantly more regulated practitioners to meet the unprecedented demand for our services.
- Regulation will significantly reduce burdens on employers: As employers, the burden of ensuring counsellors are competent and safe will be absorbed by the regulator, rather than by the employer. This will significantly reduce our liability, especially with respect to the restricted activity of psychosocial intervention. There will be a public register we can check to determine if a potential hire has current or past discipline or restrictions. There will be a disciplinary body to manage misconduct, which is an expensive process for employers. These are currently tremendous burdens that are placed on employers of unregulated counsellors, all of which would be alleviated by a regulator.

The most important benefit in support of regulation is public safety for our clients. The counselling therapists we employ and contract belong to professional associations. However, without a true regulator, an employer may discipline or terminate a counsellor for misconduct, even very serious misconduct, and that counsellor can simply work for another employer or begin their own private practice. Without a college, employers do not have a body to report concerns, or a registry to check new hires. The consequences for the public of an unethical or poorly trained counselling therapist providing services can be grave. A regulator is critical for public safety, and there are real and significant impacts of stalling regulation that must be addressed.

Therefore, **we ask that the government commit to proclaiming the CCTA immediately.** There is a mental health and addiction crisis in Alberta. Regulation of the counselling professions is urgently needed for public safety and to address this crisis.

Yours truly,

PRACTICE/AGENCY NAMES