August 4, 2023

The Honourable Adriana LeGrange Minister of Health Health.minister@gov.ab.ca



Dear Minister Adriana LeGrange

Congratulations on your re-election and appointment as Minister of Health. The need for regulation and proclamation of the College of Counselling Therapy of Alberta (CCTA) is not new to you, as you have served in ministerial roles involving mental health and safety needs for children and youth in schools and families while increasing affordability of mental health for all Albertans. We appreciate your keen understanding of the *Health Professions Act*'s role in protecting Albertans and holding health professionals accountable to appropriate standards of practice, competencies, ethics, and discipline, including loss of licensure if required. We have enjoyed working with you as Minister of Education, and our brief interaction with you as Minister of Health at the Equal Voice event in Calgary confirmed that you are supportive of the CCTA and interested in following up with us. We invite further discussions so we can support you in increasing Alberta's recovery capital and achieving your health mandates.

The CCTA aligns with your mandates; first, mental health is health. **To provide world-class mental** health care, we must start by offering clients minimum legislated safety protections through the *HPA*, like all other physical health professional services. It is of significant concern that unregulated counsellors can continue working in Alberta without training and following substantial breaches of trust, such as sexual abuse or misconduct against clients because the CCTA regulations have yet to be proclaimed. We ask the government to complete the necessary work to proclaim the CCTA to ensure professional counselling services meet minimum health safety standards in the *HPA*.

Second, Alberta must increase, retain and attract professionally trained mental health counsellors instead of losing them to different professions or leaving to work in other regulated jurisdictions. Alberta is lagging because it is one of the remaining jurisdictions that does not regulate Counselling Therapists. The government's prolonged delay in finalizing the regulations and proclaiming the CCTA creates uncertainty among current and future workers, students and post-secondary professional counselling education programs. Further, it prevents labour mobility and auto-credentialing of professionally trained counsellors from regulated jurisdictions to work as regulated Counselling Therapists in Alberta. Proclaiming the CCTA stabilizes the workforce and education programs and attracts professional counsellors from other jurisdictions to move to Alberta and have their credentials streamlined to the CCTA.

Third, proclaiming the CCTA optimizes the mental health workforce by leveraging Counselling Therapists' full scope of training, competencies, and capacities. Over 4000 professionally trained Counselling Therapists cannot fill vacant mental health counselling roles in schools, hospitals, clinics, and community practices that require being regulated in the *HPA*, which leaves needed mental health positions unfilled—particularly in rural Alberta. Furthermore, many Counselling Therapists are limited to working in positions that don't utilize their full range of skills because they remain unregulated. Alberta's health system needs all hands on deck working at their full potential.

Fourth, proclaiming the CCTA increases funding sources for mental health counselling by increasing the number and diversity of professional counsellors covered through employee benefits, insurance providers, and the Non-Insured Health Benefits program. Third-party insurance providers, NIHB, and Employee Assistance programs typically require regulated counsellors to ensure clients receive professional, safe, and effective treatment. There are First Nation, Metis and Indigenous professional counsellors in Alberta advocating the government to proclaim the CCTA because they cannot offer mental health counselling to First Nations people through NIHB without the CCTA being proclaimed. Completing the overdue steps to finalize the CCTA enhances the affordability and diversity of professional counselling options helping Albertans receive mental health counselling when, where and how they choose.

Finally, the persistent lack of culturally safe mental health services and Indigenous mental health professionals in Alberta perpetuates mental health inequity between Indigenous and non-Indigenous peoples. Unregulated counsellors in Alberta have no requirements to ensure culturally safe counselling services. The CCTA is scheduled to be the 32nd health regulatory college in Alberta and is committed to being in right relationship and partnership with First Nations, Metis, Inuit and Indigenous peoples of Alberta to address systemic racism, co-create cultural safeguards Indigenous training pathways to the CCTA, and ensure standards of practice and codes of ethics uphold Indigenous healing practices without infringement. In the spirit of reciprocity and respect for finite resources, the Government's commitment to proclaim the CCTA would ensure collaborative work with First Nations, Metis, Inuit, and Indigenous peoples will result in actionable beneficial outcomes for Indigenous peoples.

At our most recent meeting in April 2023, with the Ministry of Health and Addiction and Health Workforce Planning and Accountability, options were presented on our file for the new Ministers to be briefed on, with a simplified path to an expedited proclamation without disrupting Alberta's Recovery Oriented System of Care. We look forward to hearing that the government is prioritizing completing the steps to proclaim the CCTA.

We would like to meet with you to discuss the CCTA and answer your questions. Albertans need widespread government support to coalesce, increasing Alberta's recovery capital and mobilizing the completion of this long-standing issue. Regulating professional counsellors interconnects with various ministries and affects all Albertans. Please email Laura Hahn at registrar@acta-alberta.ca to advise of a date and time that works best for you.

Sincerely,

Laura Hahn, ACTA Interim CEO and Registrar, registrar@acta-alberta.ca

CCd

Chief of Staff, Nicole Williams, Nicole.williams@gov.ab.ca Chair of ACTA, Nicole Imgrund, Chair@acta-alberta.ca



Background and FACT Sheet ACTA/CCTA

The Association of Counselling Therapy of Alberta (ACTA) is the precursor organization to the College of Counselling Therapy of Alberta (CCTA). ACTA was established at the request of the government to build the CCTA and begin grandfathering the counselling professionals into the College to ensure a seamless transition for Alberta's workforce. ACTA has completed this work and has been prepared for the proclamation of the CCTA since 2021. The workforce, stakeholders (including employers and post-secondary programs), and the public are ready for counselling to be regulated in the CCTA. The delay in the proclamation creates unnecessary instability for Alberta's essential mental health workforce.

The Legislative Assembly of Alberta unanimously passed legislation to regulate counselling professions to address public health safety issues, improve mental health funding sources for the public, and increase access to mental health professionals throughout Alberta. Unfortunately, these concerns remain without the proclamation of the CCTA.

Regulation of counselling professions with the CCTA will Improve Albertan's Access, Affordability, and Safety of needed Mental Health Counselling:

- Provide 4000+ additional, safe, professionally trained practitioners to help meet service demands and fill vacant positions throughout Alberta, including rural areas that require being regulated within the HPA.
- Leverage the full scope of Alberta's professional counsellor's training and competencies within the health care system.
- Attract and retain the workforce of mental health counsellors in Alberta, creating diverse education options with streamlined credentialing to the CCTA.
- Enhance counselling professionals' **labour mobility to Alberta** from other provinces and countries that regulate Counselling Therapy.
- Increase **Albertan's choice of when, where and how** they receive mental health counselling as many Counselling Therapists are trained in diverse modalities.
- Ensures Albertans receive mental health counselling accountable to **minimum health safety** standards in the *HPA*.
- Enhance **culturally safe** and competent mental health services for First Nation and Indigenous peoples as collaboratively established with First Nations.
- Increase funding to Albertans through third-party insurance plans, which typically only cover health services from regulated professionals.
- Increases federal funding to First Nation and Indigenous peoples through the Non-Insured Health Benefits (NIHB) program, which limits coverage for services to regulated health professionals only.