



Canadian Life & Health  
Insurance Association  
Association canadienne des  
compagnies d'assurances  
de personnes

January 17, 2023

Mr. Nicholas Milliken  
Minister of Mental Health and Addiction  
Government of Alberta

By Email: [mha.minister@gov.ab.ca](mailto:mha.minister@gov.ab.ca)

**Re: Association of Counselling Therapy of Alberta (ACTA) – transition to a regulated profession**

On behalf of the Canadian life and health insurance industry, I am writing to encourage the province of Alberta to move forward with the proclamation of the College of Counselling Therapy of Alberta. Our understanding is that all required elements of a regulatory college have been developed. By doing so, Alberta would follow the lead of those provinces who have already regulated some or all mental health professionals (Ontario, British Columbia, Quebec, Nova Scotia, New Brunswick and PEI).

The CLHIA is a voluntary trade association with member companies that account for 99 per cent of Canada's life and health insurance business. In Alberta, the life and health insurance industry provides some 3.1 million Albertans with supplementary health benefit coverage. In 2021, the industry reimbursed roughly \$100 million for mental health services.

For context, we understand that the 12 mental health associations originally known as FACT-Alberta, came together as ACTA and ACTA will form the College once proclaimed.

**Benefits of Regulation to Albertans**

**Decreased risk of harm:**

Mental Health practitioners provide assessments, testing and therapy to Albertans. The success of therapy relies heavily on the feeling of safety and therapeutic alliance that is created between practitioner and patient. Certain treatment modalities, if not practiced according to design with proper training and supervision, can expose a client to harm or psychological distress, especially when used to treat an emotionally, psychologically, or socially vulnerable client.

Regulation provides a layer of oversight upon practice and an avenue for a patient to file a complaint with the knowledge that the regulatory college has the ability to discipline the member. Discipline can take many forms, depending upon the case, and results are posted

transparently for the safety of other Albertans who may be considering treatment by the healthcare practitioner.

Unregulated health practitioners are not required to maintain liability insurance. Regulated providers require this as a part of licensure, protecting both patients and practitioners and providing a pathway to seek damages.

**Code of ethics and standards of practice:**

The creation of ethics and standards helps ensure practitioners have the professional knowledge, skills, values and experience to provide treatment safely, and serves to provide clarity and transparency to patients.

**Expanded mental health resources:**

Most insurance plans funded by employers do not reimburse the services of unregulated providers. Public plans also do not fund these services. As wait times to access mental health treatment are expanding, regulating these professions will serve to encourage coverage through private plans, although coverage will remain the decision of the employer and insurer. Regulation will broaden the choice of mental health services that are available to the public, providing more opportunities for Albertans to find mental health care providers that are best suited to their needs.

**Titles:**

The profession proposes the restricted titles Drug and Alcohol Counsellor, Child and Youth Care Counsellor and Counselling Therapist. Navigation to the correct healthcare practitioner for treatment can be tricky for Albertans and for physicians who may refer to these practitioners. We would recommend that the register of healthcare practitioners be informative enough on sub-specialties, such as music or drama therapy, so Albertans can make an educated choice of practitioner.

**Conclusion:**

Mental health benefits are frequently included as part of an employee's overall group benefits plan. In Alberta there are regulated healthcare practitioners that provide mental health treatment including physicians, registered psychiatric nurses, psychologists and social workers. The lack of regulation of other types of mental health practitioners reduces access and increases wait lists.

Regulation of healthcare providers, such as additional mental health practitioners, helps to ensure that the services that they provide are delivered in accordance with minimum standards of practice, and this enhances the protection of the public generally.

Finally, residents of Alberta may benefit from a tax perspective if additional mental health professionals are regulated. Section 22 of the *Income Tax Act, 2000* provides a limited tax credit in respect of medical expenses as defined in section 118.2 of the *Income Tax Act (Canada)*. The federal act defines eligible expenses to include the services of "medical practitioners", including counselling therapists, but only if such practitioners are regulated in the jurisdiction in which they provide services. We believe that it would be beneficial for residents of Alberta to also have access to this tax credit as it would help mitigate some of the burden of seeking mental health treatments.

Thank you for your attention to this important issue. We would be pleased to discuss this with your officials at their convenience or provide any other information as needed. Please feel free to contact me at 416-294-9384 or [jweir@clhia.ca](mailto:jweir@clhia.ca).

Sincerely,

*Signed by Joan Weir*

Joan Weir  
Vice President, Group Benefits