



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

June 18, 2024

Government of British Columbia
Ministry of Health
PO Box 9639
STN PROV GOVT
Victoria BC V8W 9P1

By email: PROREGADMIN@gov.bc.ca

Re: Proposed Amendment – Designation of Psychotherapists

On behalf of the Canadian life and health insurance industry, I am writing to encourage the province of British Columbia to move forward with the designation of those who offer psychotherapy as a regulated health profession under the Health Professions Act.

The CLHIA is a voluntary trade association with member companies that account for 99 percent of Canada's life and health insurance business. In British Columbia, the life and health insurance industry provides more than 3.6 million British Columbians with private supplementary health insurance coverage and made payments of about \$5.4 billion on healthcare products and services in 2022.

CLHIA's interest in this topic relates to the industry's position as a key stakeholder in assisting British Columbians with access to high quality healthcare supports, which includes the services of regulated healthcare professionals. The industry has long supported regulation of healthcare professions for the protection of the public. We understand that the first step towards regulation is the designation of psychotherapy under the Health Professions Act.

Benefits of Regulation to British Columbians

Decreased risk of harm:

Mental Health practitioners provide assessments, testing and therapy to British Columbians. 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 take corrective action when appropriate and has protection of the public as its primary responsibility and commitment. When necessary, discipline can take many forms, depending upon the case, and results are posted transparently for the safety of other British Columbians 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, including covering the cost of treatment when services by a practitioner that have not adhered to practice standards have caused damage to the consumer.

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:

Some 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 British Columbians to find mental health care providers that are best suited to their needs.

Conclusion:

Mental health benefits are frequently included as part of an employee's overall group benefits plan. In British Columbia there are regulated healthcare practitioners that provide mental health treatment including physicians, registered psychiatric nurses, and 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 accepted standards of practice, and this enhances the protection of the public generally.

Finally, residents of British Columbia may benefit from a tax perspective if additional mental health professionals are regulated. Section 22 of the Income Tax Act, 2024 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 British Columbia 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 613-449-0679 or sburns@clhia.ca.

Yours sincerely,

Original signed by
Sheila Burns
Director, Health and Disability Policy