



January 31, 2022

Health Professions Advisory Council  
Manitoba Health and Seniors Care

By Email: [hpac@gov.mb.ca](mailto:hpac@gov.mb.ca)

**Re: Federation of Associations of Counselling Therapists in Manitoba (FACT-Manitoba) application for self-regulation of Counselling Therapy in Manitoba under The Regulated Health Professions Act (RHPA).**

On behalf of the Canadian life and health insurance industry, I am writing to encourage the province of Manitoba to approve the proposal of FACT-Manitoba to become a regulated profession. This 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), and Alberta where regulation has been approved but has not yet been proclaimed.

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 Manitoba, the life and health insurance industry provides some 860,000 Manitobans with supplementary health benefit coverage. In 2020, the industry reimbursed roughly \$10 million for mental health services.

For context, we understand that the mental health associations forming FACT-Manitoba and taking part in the regulatory process are as follows:

- CAMFT/MAMFT - Canadian Association of Marriage and Family Therapy/Manitoba Association of Marriage and Family Therapy
- CASC - Canadian Association for Spiritual Care - Manitoba Region
- CATA - Canadian Art Therapy Association
- CCPA - Canadian Counselling and Psychotherapy Association
- CEATA - Canadian Expressive Arts Therapy Association
- CPCA - Canadian Professional Counsellors Association
- MTAM - Music Therapy Association of Manitoba
- NADTA - North American Drama Therapists Association
- PACCP - Professional Association of Christian Counsellors and Psychotherapists
- RAFT – Relational and Family Therapists of Manitoba

Canadian Life and Health Insurance Association  
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## **Benefits of Regulation to Manitobans**

### **Decreased risk of harm:**

Mental Health practitioners provide assessments, testing and therapy to Manitobans. 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 Manitobans 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 Manitobans to find mental health care providers that are best suited to their needs.

### **Titles:**

The profession proposes the restricted title Counselling Therapist, and to share the title of Psychotherapist with other mental health service providers. We appreciate that the variation in titles will be reduced significantly. Navigation to the correct healthcare practitioner for treatment can be tricky for Manitobans 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 Manitobans 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 Manitoba 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 Manitoba 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 Manitoba 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 416-359-2003 or [jweir@clhia.ca](mailto:jweir@clhia.ca).

Sincerely,

Joan Weir  
Vice President, Group Benefits