

The Honourable George Smitherman
Minister of Health and Long-Term care
10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, ON M7A 2C4

Date

Dear Minister,

I am (insert type of mental health professional) and provide (insert types of services) to (insert client base) in (insert setting and geographical location). I am a member of (insert name of professional association), which is a member of the Ontario Coalition of Mental Health Professionals.

The Health Professions Regulatory Advisory Council (HPRAC) proposes to regulate the provision of psychotherapy, one of many professions providing mental health services in Ontario, by amending the Regulated Health Professions Act (RHPA). They have advised you to draft legislation that would set up a College of Psychotherapy and grant psychotherapy an enforceable scope of practice.

I believe that all mental health services, not just psychotherapy, must be regulated in order to protect the public. People receiving mental health care are vulnerable at the time of their lives when they seek assistance or treatment. All mental health professionals, regardless of the titles they use, pose a risk of harm to the public due to the nature of their work. Thousands of mental health workers who are not full-time psychotherapists must continue to provide much-needed services and this broad spectrum of professionals needs to be regulated.

I also believe that it is in the public interest for Ontarians to have the choice of a wide range of mental health services to ensure that:

- the pool of qualified providers is not diminished;
- services are available in remote areas;
- services are available in languages other than English and French; and
- culturally competent services are accessible to diverse communities.

I am opposed to two issues in HPRAC's proposal to regulate psychotherapy:

- the rigid dichotomy between counselling and psychotherapy; and
- the mechanism of an enforceable scope of practice.

As a practitioner, I can tell you that there are no bright lines between counselling and psychotherapy; they operate on a continuum and cannot be arbitrarily separated. All mental health professionals:

- provide services for mental health, psychological or emotional reasons, and

- deliver these services through a psychotherapeutic relationship.

I oppose regulation using an enforceable scope of practice (ESP) for psychotherapy which is even more restrictive than a controlled act under the RHPA. An ESP is more restrictive because it will prohibit non-Psychotherapists from providing any aspect of the treatment of “cognitive, emotional or behavioural disturbances”, as HPRAC describes the proposed scope of practice for psychotherapy.

Regulating only psychotherapists, rather than a broader range of mental health professionals, and granting psychotherapy an enforceable scope of practice, will seriously curtail the choice of safe mental health services for scores of Ontarians across the province. Thousands of professionals, who are qualified and experienced mental health practitioners, but not psychotherapists per se, will be legally barred from continuing to offer services that deal with cognitive, emotional or behavioural disturbances.

Any legislation that gives psychotherapists an exclusive monopoly to provide services for cognitive, emotional and behavioural disturbances will be virtually unenforceable. The new regulatory body will not be able to police thousands of non-psychotherapists who are trained to provide treatment for cognitive, emotional and behavioural disturbances.

In addition, quality mental health services are desperately needed in communities across Ontario. Any law that curtails the availability of these services and creates barriers to access, especially in remote areas and for diverse communities, is not in the public interest. As well, the government cannot justify the expense of prosecuting mental health counsellors when these scarce resources are better spent on providing a broad range of quality mental health services to Ontarians.

I believe that any new regulatory regime must ensure that the public has their choice of the mental health care provider, access to a range of appropriate mental health care services, and protection from unqualified and unscrupulous mental health care practitioners.

Any new College must have a critical mass of members to ensure that it is financially viable. Therefore, the legislation must:

- adopt a broad definition of psychotherapy that captures all mental health workers, including those who are currently unregulated;
- regulate all persons providing mental health services; and
- require currently regulated health professionals who are practicing psychotherapy to meet qualifications and accountability measures specific to psychotherapy.

I would be pleased to discuss this matter with you.

Yours very truly,

(insert Name, Title, and Degrees

Name of MPP
Name of Riding
Address of Constituency Office

Date

Dear (insert name of MPP),

I am (*insert type of mental health professional*) and provide (*insert types of services*) to (*insert client base*) in (*insert setting and geographical location*). I am a member of (*insert name of professional association*), which is a member of the Ontario Coalition of Mental Health Professionals. I am a (*insert name of Ontario riding*) constituent.

The Health Professions Regulatory Advisory Council (HPRAC) has proposed that psychotherapy, one of many professions providing mental health services in Ontario, be regulated under the Regulated Health Professions Act (RHPA). HPRAC has recommended to Minister Smitherman that the Act be amended to set up a College of Psychotherapy and grant psychotherapy an enforceable scope of practice.

I believe that all mental health services, not just psychotherapy, must be regulated in order to protect the public. People receiving mental health care are vulnerable at the time of their lives when they seek assistance or treatment. All mental health professionals, regardless of the titles they use, pose a risk of harm to the public due to the nature of their work. Thousands of mental health workers who are not full-time psychotherapists must continue to provide much-needed services and this broad spectrum of professionals also needs to be regulated.

I believe that it is in the public interest for Ontarians to have the choice of a wide range of mental health services to ensure that:

- the pool of qualified providers is not diminished;
- services are available in remote areas;
- services are available in languages other than English and French; and
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- provide services for mental health, psychological or emotional reasons, and
- deliver these services through a psychotherapeutic relationship.

I oppose regulation using an enforceable scope of practice (ESP) for psychotherapy which is even more restrictive than a controlled act under the RHPA. An ESP is more

restrictive because it will prohibit non-Psychotherapists from providing any aspect of the treatment of “cognitive, emotional or behavioural disturbances”, as HPRAC describes the proposed scope of practice for psychotherapy.

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Any new College must have a critical mass of members to ensure that it is financially viable. Therefore, the legislation must:

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- regulate all persons providing mental health services; and
- require currently regulated health professionals who are practicing psychotherapy to meet qualifications and accountability measures specific to psychotherapy.

I would be pleased to discuss this matter with you.

Yours very truly,

(Insert Name, Title, and Degrees)

***Sample Letter Requesting Approval
to Inform Clients
of the Coalition's Lobbying Campaign***

(please adapt as needed)

To: Colleague, Manager, Supervisor
Re: Advocacy Campaign for Consumers of Mental Health Services
Date:

As you may know, the Regulated Health Professions Advisory Council (HPRAC) has recommended to Ontario's Minister of Health and Long Term Care that psychotherapy be regulated under the Regulated Health Professions Act (RHPA).

Unfortunately, HPRAC singled out Psychotherapists for regulation to the exclusion of many other qualified mental health counsellors.

As a member of (*insert name of your professional association*) my ability to practice would be in jeopardy if the Health Minister takes HPRAC's advice and singles out Psychotherapists for regulation, leaving out all other mental health counsellors and therapists.

HPRAC draws an artificial dichotomy between psychotherapy and counselling which, in practice, operate on a continuum with no bright lines to distinguish the two.

HPRAC also singles out Psychotherapists on the basis that: a) they assist people in need of significant help and (b) they do so through one-on-one therapeutic relationships when, in fact, the same is true of thousands of other mental health professionals who provide quality services to clients across Ontario.

My association is a member group in the Ontario Coalition of Mental Health Professionals which represents over four thousand seven hundred practitioners who *agree* that psychotherapy should be regulated but *disagree* that *only* Psychotherapists should be regulated.

The Coalition is sounding the alarm that to restrict regulation only to Psychotherapists would:

- significantly diminish the pool of qualified mental health providers;
- reduce mental health services in remote areas;
- reduce the provision of services in languages other than English and French; and
- reduce culturally competent mental health services to diverse communities.

The Coalition is urging the Health Minister to ignore HPRAC's advice and regulate *all* qualified counsellors and therapists who provide mental health services across the province.

The Coalition also believes that clients, as members of the public, may wish to participate in this lobbying campaign. How mental health services are regulated is a significant public policy issue that directly affects them. The purpose of client participation is to give them the opportunity to express their concerns about HPRAC's recommendations *before* legislation is presented to the legislature (likely mid-October).

The ethical issues involved in client participation have been thoroughly addressed by the Steering Committee and vetted through the Coalition's counsel. As an individual practitioner, I agree with the Coalition's call for client participation in lobbying.

The Coalition has provided two client 'hand-outs', both of which are attached to this memo. The first is an Action Alert summarizing the Coalition's concerns and the second is a form letter for the clients who choose to correspond with the Minister.

Please note that the fact sheet contains a disclaimer stating that the decision to send the letter is entirely the client's and that the practitioner does not wish to know whether or not the client has decided to write a letter. Other procedural details, ensuring ethical and straightforward use of the client letter are available here at (*insert name of practitioner's workplace*) if you wish to see them.

Please consider this proposal and let me know if you have any questions. The legislative time-line is extremely tight. If we can move forward within the next week that would give our clients the opportunity to participate in this important public policy debate.

Thank you very much for your consideration.

Sincerely,

(*insert name, titles, degrees*)

**Ontario Coalition of Mental Health Professionals
September 9, 2006**

***Letter-writing Campaign on the Regulation of Psychotherapy
Practitioners***

STAGE 1

Letter to Health Minister George Smitherman

- fill in the blanks in the first paragraph
- sign the letter with your title and degrees
- copy letter on to your letterhead
- mail hard copy or send by e-mail to george.smitherman@moh.gov.on.ca
- copy letter to Assistant Deputy Minister, Mr. Joshua Kepper, Assistant Deputy Minister of Health and Long-Term care at same address
joshua.tepper@moh.gov.on.ca

Letter to MPPs

- address letter to your local MPP*
- fill in blanks in the first paragraph
- sign the letter with your title and degrees
- copy letter on to your letterhead
- mail hard copy or send by e-mail to the constituency office

* to find your MPP click here [Ontario Legislature](#) and go to 'Current Members'.

Tracking Letters

It is critical for Advocacy Committee to keep track of the number of letters going to the Minister and local MPPs. It is the only way for the Coalition to know how well the campaign is going. Please notify your association's advocacy liaison person by sending a blind copy of all e-mails or a separate e-mail that includes your MPP's name and riding.

YOUR OCA LOBBYING LIASON PERSON IS REV KIETH BUCKINGHAM,

Keith.Buckingham@jus.gov.on.ca

STAGE 2

If the Minister introduces draft legislation, as is widely expected, the Coalition will undertake further lobbying efforts based on the specifics of the proposed legislation.

In addition to a new round of letters to the Minister and MPPs, you will also be asked to write to the Premier.

All letters will be approved by the Coalition Steering Committee and distributed by the Advocacy Committee. Your association's liaison person can answer any questions you may have.

You may be asked to contact your MPP at the local constituency office for a face-to-face meeting. In the meantime, if you have personal contact with your MPP, use the letter as your briefing note. The text and executive summary of the Coalition's brief to the Minister is also available on our website www.mentalhealthcoalition.ca.