

AR 201035

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Linda Sahli
CEO and Registrar
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PO Box 77054
St. Albert AB T8N 6C1

Dear Linda Sahli:

Thank you for your correspondence to Minister Copping and Associate Minister Ellis regarding the regulation of counselling therapists, addiction counsellors, and child and youth care counsellors under the *Health Professions Act*. As Assistant Deputy Ministers for Health Workforce Planning and Accountability and Health Service Delivery, we can respond on behalf of the Government of Alberta to outline more on the planned next steps related to points you raised. Additionally, there is some misinformation referenced in your letter which needs to be corrected.

Timeline for additional consultations

Regarding your questions about the timeframes for the additional analysis of implications for service delivery and engagement with key stakeholders, there are a number of high priority files that the government is working to advance at this time. As you can hopefully appreciate, managing the pandemic and other related health system needs continues to be the top priority for the Ministry. Ensuring all perspectives are considered and all concerns are addressed is a time intensive process. This is a regulation that the Alberta government has been asked to put in place, so it is important for government to take the time needed to undertake additional consultation. Additionally, as you know, the development of regulations is complex from a legal perspective so requires additional allocation of resources. I appreciate your continued patience as we work through this process.

For context, the Health Professional Regulation Unit, which is responsible for these types of consultations, is currently implementing some transformational amendments to the *Health Professions Act*. These amendments, originally passed in Bill 46, are prioritized for implementation by the end of 2022. Government and regulatory colleges are investing significant resources to complete this work. Any other projects that require the development of new professional regulations under the *Health Professions Act*, such as the regulations for the counselling therapy professions, means diverting resources from the Bill 46 work. Therefore, additional projects dealing with professional regulations will not commence until after the Bill 46 work is complete. We anticipate once Bill 46 work is complete and consultations have occurred, along with any concerns addressed, that work on the regulation can resume.

Recovery-oriented care

The Government of Alberta is committed to the mental health and well-being of all Albertans. Alberta is developing a recovery-oriented provincial approach to address addiction and mental health issues, which provides access to a continuum of services and supports that incorporate prevention, intervention, harm reduction, treatment and recovery.

This shift toward a recovery-oriented system of care will ensure that Albertans are supported on their recovery journey with evidenced based, integrated and coordinated services; are provided choices that align with their individual needs and goals; and that government is investing in services that demonstrate positive outcomes.

While government supports steps to ensure quality oversight of addiction counseling, as we have previously stated, we need to ensure that regulation does not have any unintended consequences (such as related to workforce and staffing for service delivery, red tape or barriers for workers within the sector, and measurement of outcomes). The additional consultation will help government to better understand the concerns expressed and ensure steps are taken to mitigate issues.

In the interim, other regulated health professions are available in Alberta for individuals or employers who wish to access services from a regulated professional. The regulation and licensing of addiction and mental health services under the *Mental Health Services Protection Act* and regulation allows the Government of Alberta to provide key oversight and set quality standards for certain services. In addition, strengthened funding accountability requirements are supporting increased clinical oversight.

Statements made in the letter about government intentions are not accurate, and we have been clear throughout that the objective is to ensure any steps to enhance oversight of the counselling profession need to be done in a way that strengthens services and protections for Albertans without adding barriers.

Professional regulation

As a point of clarification, the proposed regulation was drafted by Alberta Health in partnership with the Association of Counselling Therapy of Alberta (ACTA) and with the assistance of the Alberta Health Legislative Counsel. If a decision is made for this regulation to be approved and come into force, the College of Counselling Therapy of Alberta would be responsible for regulating the counselling therapy professions in Alberta.

As you are aware, regulation of health professions is a provincial matter. National professional associations, such as the Canadian Addiction Counselling Certification Federation, are not the same as provincial regulatory colleges. National professional associations do add value to the system, offering a variety of key functions, such as certification exams, accreditation programs or continuing education opportunities. Regulatory colleges in Alberta often work in collaboration with these types of organizations as part of their legislative role in professional regulation.

ACTA's Regulation Questions and Answers booklet

We appreciate you sharing the ACTA's Regulation Questions and Answers booklet, which serves as an informative document for those wishing to become educated about the proposed regulation. As stated previously, Alberta's government supports high-quality service delivery by all regulated professions; however, issues raised by interest groups to date necessitate

additional consultation with First Nations in Alberta, addiction service providers, and the ministries of Community and Social Services and Children's Services.

Thank you again for sharing your support for the regulation of counselling therapy professions. We will continue to keep you apprised on next steps.

Sincerely,



Paul Smith
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Alberta Health



Evan Romanow,
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