



THE ASSOCIATION OF
COUNSELLING THERAPY
OF ALBERTA

March 18, 2022

Honourable Jason Copping, Minister of Health
Honourable Mike Ellis, Associate Minister of Mental Health and Addictions
Sent by email to: health.minister@gov.ab.ca & AssociateMinister-MHA@gov.ab.ca

Dear Minister Copping and Associate Minister Ellis,

Thank you, Minister Copping, for the conversation we had on March 11, 2022. And thank you, Associate Minister Ellis, for the letter of March 11, 2022, outlining the next steps in our collaboration toward opening the College of Counselling Therapy of Alberta (CCTA).

At the outset, we wish to make an important clarification. The March 11, 2022 letter from Associate Minister Ellis characterizes Association of Counselling Therapy of Alberta (ACTA) as advocating for the counselling professions. This is inaccurate; ACTA is not an advocacy body for professional interests of the counselling professions. ACTA was established at the behest of the Government and acts in the best interests of the public. We require our board members to have training about acting in the public interest, and to sign an undertaking that they are making decisions and guiding the organization in the public interest only. ACTA's mandate was given to us by the Government: to develop the CCTA in the best interests of the public in order to be ready to realize Government direction and open the CCTA; and to grandparent the current workforce into the CCTA to avoid workforce and service disruptions. As the Government-directed precursor organization to the CCTA, we act in the public interest similar to the Government's expectations of other regulatory colleges under the *Health Professions Act*. ACTA is a member of the Alberta Federation of Regulated Health Professionals, and has been expected by the Government to conduct itself where possible as a regulatory college. This was evident during the pandemic, when we received Government direction that ACTA was to, like other regulatory Colleges, help ensure professionals comply with health orders. ACTA has also been granted status by this Government under Bill 21 Regulations similar to other mental health regulators under the *Health Professions Act*. ACTA has taken this Government's direction to ensure that professional interests and advocacy is not performed by Colleges. The counselling professions in Alberta have 13 associations that perform those professional advocacy functions; ACTA was created specifically at the Government's direction to be separate from professional advocacy functions and to become the regulatory of the professions.

[ACTA's Mission, Vision and Values](#) document provides information about ACTA's purpose as a Government-directed precursor organization to a regulatory college under the *Health Professions Act*.

ACTA is the Government's partner and has followed this Government's direction in the development of the CCTA and the organization of ACTA. In 2019, ACTA was given instructions from this Government not to collaborate with or engage stakeholders on CCTA development until after the Government consultation was complete. In particular, ACTA was directed by the Government that it may not engage or establish relationships with the Indigenous and Metis Nations until after Government to Government consultation was initiated, according to protocol. ACTA has understood and honoured the Government's directions and protocol. We understand that any additional consultations you feel are now needed to supplement the February 2021 consultation are conducted by Alberta Health and not ACTA, and we appreciate that we are aligned in this regard.

Alberta Health's formal consultation on the CCTA regulation was completed in February 2021. We were advised that it was a comprehensive consultation on a new regulatory college and included First Nations engagement. We were also advised that it received a fulsome stakeholder response, with overwhelming positive feedback. If there are some relevant service providers and employers that the Government consultation missed last year, or who did not respond but now wish to, ACTA supports that additional consultation.

ACTA is particularly supportive of this Government conducting more engagement with First Nations and the Metis Nation. ACTA has been asking the Government since June 2021 to engage on a Government to Government level regarding the concerns raised by the Treaties 6 and 8 Grand Chiefs (as we were advised) at that time. Out of concern that no response had been provided by the Government, ACTA undertook to send a letter to the Chiefs in September 2021 in order to address their concerns and share our intention to start our journey as a college in right relationship with them, and in accordance with the principles of Truth and Reconciliation. This correspondence is attached for your reference. We are glad that the Government is now ready to address their concerns, through proper protocol.

Associate Minister Ellis, you have indicated in your letter that you have no timeline for these additional engagements. We hope the concerns of some of the Alberta First Nations will now be prioritized rather than have no established timeline. It has been almost 9 months since the letter was sent to the Government from the Grand Chiefs. We were pleased to hear you both state at the Consideration of Main Estimates meeting on March 16, 2022, that the concerns raised by First Nations with respect to the Treaty Right to Health are important. We look forward to receiving the results of the consultation and to participate in whatever way might be helpful in addressing concerns.

Since September 2021, ACTA was encouraged by Alberta Health to reach out to some service providers and employers to answer their questions and correct possible misinformation. We have also been told that no one in Alberta Health is aware of whether any concerns or issues have actually been raised. For your reference, we have attached the responses we have provided to service providers and employers after we have talked with them. It is in the best interest of all that the transition to a regulated environment be as smooth as possible.

ACTA/CCTA is prepared to continue to be available and responsive to all stakeholders in this transition. We understand the direction Alberta Health has given us to ensure that the mental health and addiction workforce and services are not disrupted, and we take that responsibility seriously. We hope that concern for public risk will be a priority for the Government in determining the timing of proclamation, and that consultation with stakeholders will be seen as a critical process that will continue beyond proclamation.

Mental health and addiction services are a high priority for the Government and Albertans. The public safety risk of unregulated professionals providing critical health services to Albertans should be addressed expeditiously. We therefore respectfully request that these additional consultations be given priority, rather than have no established timeline. The Government has had 3 years to put these basic public protections in place for those receiving mental health services in the province. Every day that unnecessarily goes by without these public protections is unacceptable to Albertans who have been waiting for the legislation to be enacted.

Before closing, we would like to point out an inaccuracy in recent communications coming out of MLA offices. Their correspondence states that ACTA drafted the CCTA regulation. This is inaccurate. The regulation has always “belonged” to Alberta Health and was drafted by Alberta Health in consultation with ACTA. The decisions on the content of the draft regulation were those of Alberta Health, and ACTA respected that. This is an important clarification for the additional consultations you are conducting, and those you are consulting with should be aware that the regulation was drafted and decided upon by Alberta Health (in consultation with ACTA), in the public interest. We respectfully request that a correction be issued to MLAs, so they can give the public correct information.

As always, we look forward to working together with you and Alberta Health on responses and solutions to any questions or concerns that may arise with these additional consultations, as partners in the public interest.

Yours truly,

Linda Sahli, CEO & Registrar
Nicole Imgrund, ACTA Board Chair

Cc:

Paul Wynnyk, Deputy Minister of Health
Evan Romanow, Assistant Deputy Minister
Paul C. Smith, Assistant Deputy Minister
Shannon Gill, Chief of Staff, Minister of Health
Eric Engler, Press Secretary, Office of the Associate Minister of Mental Health and Addictions

Attachments:

September 24, 2021, ACTA Letter to Grand Chief Watchmaker and Grand Chief Noskey