



April 24, 2007

The Standing Committee on Social Policy
Legislative Assembly of Ontario
Room 1405, Whitney Block
Queen's Park
Toronto, Ontario
M7A 1A2

Re: Bill 171, Health System Improvements Act, 2007

Thank you for the opportunity to comment on Bill 171, the Health Systems Improvement Act 2006.

Our interest in Bill 171 relates to the proposed Psychotherapy Act. We support the principles that are the basis for the strengthened regulation of this activity: public protection and patient safety, informed choice, high quality health care services and accountability for professionals. These principles are critical to the care of our clients, both in institutional and community settings.

In regard to the establishment of a College of Psychotherapy, we support the government's stated intention to ensure that social workers can continue to provide psychotherapy as regulated by their own college; an entitlement likewise extended to physicians, psychologists, nurses and occupational therapists. Failure to approve such an amendment would have had significant consequences for the services provided to our clients, and we appreciate the government's goodwill in addressing this issue.

There is however, a potential concern with the creation of the new College that we wish to convey to the members of the Committee. Many service providers employ direct service workers who deliver cognitive behavioural therapy and dialectical behavioural therapy to persons with serious mental illness in our publicly funded system. These are forms of psychotherapy. Many direct service workers have extensive training but not necessarily academic credentials. We are concerned that as we do not know what the criteria for entry into the new College of Psychotherapy will be, there is the potential for severe service

disruption affecting thousands of people with serious and persistent mental illness if their service workers are excluded from delivering service. These clients are often marginalized and have no other alternatives for treatment. It is critical that access to appropriate treatment be maintained.

We recommend that mental health institutions and particularly community mental health agencies be consulted regarding how to maintain access to necessary treatment.

Both of our organizations are prepared to work closely with the Council in facilitating these consultations.

Thank you again for the opportunity to comment on this proposed legislation. If you have any questions about this submission, please do not hesitate to contact us.

Sincerely,

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