



CANADIAN
PSYCHOLOGICAL
ASSOCIATION

SOCIÉTÉ
CANADIENNE
DE PSYCHOLOGIE

March 6, 2025

The Honourable Mark Holland, P.C., M.P.
Minister of Health
House of Commons
Ottawa ON K1A 0A6
Email: Mark.Holland@parl.gc.ca

Dear Minister Holland:

The Canadian Psychological Association (CPA) is pleased to see the release of your *Canada Health Act* letter of interpretation on January 10, 2025. The letter is important in terms of recognizing the evolving scope of practice of several regulated health professions (nurse practitioners, midwives and pharmacists) in the context of providing medically necessary services to the people of Canada. In terms of next steps, it will be important to see how each province and territory determines what constitutes a physician equivalent health care service where extra billing is not permitted.

Given the importance that a significant proportion of Canadians place on timely access to psychological services the CPA was disappointed to see these services effectively carved out from the letter of interpretation.

In our view, there is much more the federal government can and must do in this space to improve the overall mental health and well-being of Canadians. The national mental health community – including the Canadian Alliance on Mental Illness and Mental Health (CAMIMH; of which the CPA is a founding member) – continues to call on the federal government to establish a companion piece of legislation to the Canada Health Act called the *Mental Health and Substance Use Health Parity For All Act* which recognizes the need to expand and improve access to publicly funded mental health care services.

Embedded in this legislation would be a dedicated envelope of federal funding – such as a Canada Mental Health Transfer – which was a commitment by your government in the last federal election. Alternatively, the government could amend the *Canada Health Act*, such as was proposed by MP Gord Johns with the tabling of Bill C-414 tabled in the last session parliament and advanced by the Canadian Mental Health Association and others. These avenues underscore that there is more than one legislative road for the federal government to pursue that leads to the same outcome; which is to improve timely access to evidence-based publicly funded mental health care services provided by a regulated professional.

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Your letter of interpretation does not expand the core basket of publicly insured services, nor does it recognize that psychology, as a regulated profession, has a physician equivalent scope of practice in defined areas, such as the assessment, diagnosis, and treatment of mental health and substance use health concerns.

Further, while your letter of interpretation underscores the decision-making authority of the provinces and territories in determining medical necessity, we believe the federal government can play a stronger leadership role in advancing access to psychological services and supporting the implementation of innovative delivery models.

With a federal election on the horizon, the CPA remains hopeful that the federal government would continue to make clear statements that look to expand access to publicly funded psychological services. The time is long overdue to recognize in legislation that we value our mental and physical health equally. There can be no health without mental health.

I would be pleased to continue this discussion with you at your convenience. I can be reached via email at executiveoffice@cpa.ca.

Sincerely,



Lisa Votta-Bleeker, PhD
Chief Executive Officer

cc: The Honourable Yaa'ra Saks, Minister of Mental Health & Addictions