



April 28, 2020

The Honourable William Morneau
Minister of Finance
90 Elgin Street
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Email: Bill.Morneau@parl.gc.ca

Dear Minister Morneau:

On behalf of the Canadian Psychological Association (CPA), we would like to thank you for the leadership that the federal government has provided in response to the COVID-19 global pandemic. Clearly, these unchartered times in which we live require an unprecedented response.

The CPA is the national voice for the science, practice and education of psychology in the service of the health and welfare of Canadians. The CPA is Canada's largest association for psychology and represents psychologists in public and private practice, university educators and researchers across sectors, as well as students. Psychologists are the country's largest group of regulated and specialized mental health providers, outnumbering psychiatrists about 4:1, making our profession a key resource for the mental health treatment Canadians need.

While many of our members provide clinical care, research and education within publicly funded (academic) institutions, hospitals and community-based organizations, there are a growing number of psychologists who provide clinical care within a private practice setting. It is these members who have raised a number of important issues about the impact of COVID-19 on access to, and the delivery of, psychological services

COVID-19 is impacting the mental health of Canadians. Isolation, job loss and health anxiety are taking a toll. Prolonged isolation and physical distancing can lead to increased depression, anxiety, suicidal crises and domestic crisis and violence. Programs such as Wellness Together Canada will provide guidance and information about coping with COVID-19 to many Canadians, but more specialized and individual care will be needed by those Canadians with pre-existing mental health conditions and by those who develop them as the result of the psychosocial and economic stressors of COVID-19. Psychological treatments are evidence-based and effective solutions for the mental health problems and disorders Canadians face, and they deserve access to them.

The barriers Canadians faced accessing psychological service have been made worse by COVID-19. As you may know, outside of publicly funded institutions, Canadians pay out-of-pocket for psychological services or rely on employer-sponsored supplementary health benefit plans. In effect, psychologists are small businesses, whose services, in the wake of COVID-19, are increasingly needed by Canadians.

With COVID-19, a growing number of Canadians are losing their jobs and access to their employer-sponsored supplementary health benefits. With physical distancing, face-to-face psychological treatment is not possible. Even for those who retain their benefits, it is not clear if psychological treatments delivered virtually will be covered. Barriers to accessing coverage for psychological services, at a time when Canadians face the toll that COVID-19 is taking on their mental health, make it essential that we support psychologists in private practice.

Psychologists are falling through the cracks of CERB, CEWS and CECRA. The CPA is appreciative of the federal government's announcement on April 16, 2020 to adjust the threshold of eligibility for the Canada Emergency Business Account (CEBA). This change will allow those psychologists with smaller staffs to apply for needed assistance.

However, psychologists in private practice are experiencing significant practice disruption and loss of income for a variety of reasons. Their patients without income or coverage may no longer be able to afford needed care. Even if patients' jobs and benefits are in place, coverage may not extend to virtually delivered services. While regulatory bodies of psychology are advising against face-to-face care, some patients may be uncomfortable with, or unable to access care virtually.

Further, even when patients can access virtual care, psychologists face considerable expense in moving their practices to a digital platform, both safely and quickly. Because some patients may be able to continue treatment and/or psychologists will continue to see patients on an urgent bases, their loss of income, while significant, is not likely complete.

For these reasons, psychologists will not likely be eligible for the Canada Emergency Response Benefit (CERB), which contrasts with Employment Insurance (EI) and allows for other sources of income. They may also not qualify for the Canada Emergency Wage Subsidy (CEWS) if they pay themselves through dividends rather than earned income. Consequently, even if they lose considerable income due to the pandemic, they will not qualify for the 75% wage subsidy.

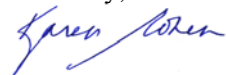
The CPA welcomes the introduction of the Canada Emergency Commercial Rent Assistance (CECRA) program. However, there remain significant concerns that psychologists will not benefit from the program unless property/owners apply for financial relief. Psychologists have fixed operating expenses and fluctuating incomes with no relief. As a consequence, some are letting staff go while others are leaving office space where they have provided a valuable community service for years. Psychologists are a needed community resource who face closing their doors. Federal programs that offer financial relief need to consider declining income in the face of continued or increased expenses.

Recommendations. Canadians will need access to psychological services and supports in coping with COVID-19. The CPA strongly encourages the federal government to ensure that the Canada emergency response programs are aligned to support and encourage the provision of psychological treatments and services.

In the absence of support for private sector psychologists, the CPA is concerned that the federal government will be hindered in its commitment to facilitating access to quality mental health care which will negatively impact Canadians. As Prime Minister Trudeau said, "...no one should be left behind", we agree, and strongly encourage the federal government to support the practice of psychology in this critical time of need.

The CPA stands ready to work with you to find sustainable solutions that keep Canadians mentally as well as physically healthy; our success as a country depends on it. I would be pleased to discuss this with you at your earliest convenience, I can be reached at executiveoffice@cpa.ca.

Sincerely,



K. R. Cohen, PhD., C. Psych
Chief Executive Officer

Copies to: The Honourable Patty Hajdu, Federal Minister of Health
Provincial-Territorial Psychological Associations