January 25, 2019

The Honourable Bill Morneau
Minister of Finance
House of Commons
Ottawa, Ontario, Canada,
K1A 0A6

Dear Minister,

I am writing to you on behalf of the Ontario Association of Consultants, Counsellors, Psychometrists and Psychotherapists. Representing over 2,400 front line mental health professionals across the province, we are Ontario’s largest mental health association of its kind.

Today I reach out once again to seek your support in having the Federal Government remove GST/HST from psychotherapy services.

When we last corresponded, in the late spring of 2018, your support was requested to remove this tax and the significant barrier to service that it represents for Canadians all across the country. In your reply of April 30, 2018, you helpfully articulated the underlying policy around what constituted a basic healthcare service and the resulting exemption from GST/HST. At that time, you noted the three criteria used in determining such exemption eligibility were as follows:

- If a service is covered by the public health insurance program in a given province or territory, it is exempt in that province or territory.
- If a service is covered by the public health insurance program of two or provinces or territories, it is exempt in all province and territories.
- If a profession is regulated as a health profession by at least five provinces or territories, the services of that profession are exempt in all provinces and territories.

Accordingly, while disappointed, the Government’s position was understood and accepted in that the services of psychotherapists failed to satisfy any of the criteria to be exempted at that point in time.
Today however represents a marked change in the request for exemption as I respectfully bring to your attention the fact that five provinces have now legislated the regulation of the profession of psychotherapy. These provinces are Ontario, Québec, Nova Scotia, New Brunswick and most recently Alberta. Psychotherapy services meet the third criteria of those previously cited for exemption.

There is no question that a mental health crisis exists across Canada. Additionally GST/HST represents a significant financial barrier to many accessing mental health services; a petition launched on February 21, 2018 calling on the federal government to eliminate this tax barrier to service was signed by over 5,650 Canadians.

Once again I am reaching out to seek your support in having the Federal Government remove GST/HST from psychotherapy services as recommended in the December 2017 Senate Finance Committee Report’s eleventh recommendation; that mental health counselling and psychotherapy services be exempt from the Goods and Services Tax (GST) and federal portion of the Harmonized Sales Tax (HST).

I remain hopeful that in its efforts to continue to improve the overall mental health services for Canadians the federal government will assist us all in reducing the financial barriers associated with these services.

Respectfully submitted on behalf of OACCPP,

Suzanne Dennison, DCS., RP
(Cert) OACCPP
President
OACCPP