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July 17, 2014

Ministry of Health and Long-Term Care
10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, Ontario M7A 2C4

Attention: Dr. Eric Hoskins

Dear Dr. Hoskins:

Re: Amendments to the *Psychotherapy Act, 2007*, *Psychology Act, 1991* and *RHPA*

It is our position that the amendments to the *Psychotherapy Act, 2007* and the *Psychology Act, 1991*, together with the amendment to the *Regulated Health Professions Act (RHPA)* that makes the assessment and treatment of human conditions a 'controlled act of psychotherapy', must be repealed.

We understand from the Transitional Council of the College of Registered Psychotherapists of Ontario website that these amendments are to be proclaimed on October 1, 2014. We ask that the *Psychology Act, 1991, S.O. 1991, c. 38 specifically Section 4.2*, and the *Psychotherapy Act, 2007, s. 3, 4, 10* and the *RHPA*, subsections 27 (2) referring to the controlled act of psychotherapy and 30 (1) (2), must not be proclaimed because these amendments directly encroach on alternative, holistic, energy and spiritual treatments and practitioners by making all the assessments and treatments they do an 'act of psychotherapy'. Combined, these amendments subject alternative, holistic, energy and spiritual practitioners to regulation and prosecution by the new College of Psychotherapy.

The amendment that adds the wording to the *RHPA* that "treatment, delivered through a therapeutic relationship, of an individual's serious disorder of thought, cognition, mood, emotional regulation, perception or memory that may seriously impair the individual's judgement, insight, behaviour, communication or social functioning is the new controlled act of psychotherapy" and that is added to the existing list of controlled acts within subsection 27 (2) of the *RHPA*, is particularly damaging to holistic, alternative, energy and spiritual practitioners.

The referenced amendments directly encroach on alternative, holistic, energy, and spiritual treatments and practitioners who safely and effectively treat all disturbances of human life and have done so for decades. We believe this to be true based on the following conclusions we have drawn:

- The assessment and treatment of human conditions of all severity and type are not 'acts of psychotherapy', but acts of assessment and treatment, with psychotherapy being only one of many hundreds of approaches to the 'act of assessment and treatment';
- 'Psychotherapeutic techniques, serious, and impaired' are only a few of the important terms used in the legislation that are damaging to non-psychotherapeutic practitioners, because they are not

defined. Being undefined they do encompass all approaches and techniques to assessment and treatments of human conditions used by many non-psychotherapy practitioners, including those psychotherapists and psychologists that have appropriated from alternative modalities of healing.

Appropriate and open public consultation has not taken place. These *Acts* were passed in a huge Omnibus Bill which limited opportunity for public debate and examination.

Economically, the amendments to these *Acts* will put 1000's of individuals out of work when they become unable to practice the alternative, holistic, energy, and spiritual healing methods they have chosen and which their clients prefer.

People are paying out-of-pocket for alternative treatments and therefore free choice must be assured, especially since alternative assessments and treatments are safe and have proven themselves effective over time.

The proclamation of these *Acts* as amended, will drastically restrict individuals practicing alternative, holistic, energy, and spiritual healing methods to the point of unjust elimination from the health care field in Ontario and in the process will violate the rights of Ontarians to free choice in treatment for issues of human disturbances.

We believe there should be choice in treatments for all issues of human life, and we do not want to see any restrictions on any Ontario practitioners and their treatments. We feel alternative, holistic, energy, and spiritual healing practitioners should not be regulated under psychotherapists or psychologists, nor should the assessment and treatment of human disturbances be deemed an 'act of psychotherapy', regardless the definition of psychotherapy.

Please take this letter into consideration and allow more time for consultation before the amendments in the *Psychotherapy Act*, the *Psychology Act* and the *RHPA* make the assessments and treatments of human disturbances an 'act of psychotherapy', are proclaimed into law.

Individuals involved in alternative, holistic, energy and spiritual healing methods take great pride in their success and acceptance by the public. Alternative, holistic, energy, and spiritual treatments are based on centuries of proven techniques and teachings that should not be regulated under psychotherapists or psychologists, regardless of their definition.

We request confirmation of your receipt of this letter, as well as a response, at your earliest opportunity. Specifically state whether you will or will not allow for more time and consideration and the reasons for your decision(s).

Should you require further information, please contact our office or Grace Joubarne at 613-422-7027.

Thank you for your consideration and we look forward to a positive response.

Yours truly,
GREEN AND ASSOCIATES



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