



Canadian Psychiatric Association  
*Dedicated to quality care*  
Association des psychiatres du Canada  
*Dévouée aux soins de qualité*

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**SENT BY EMAIL:** [publications@healthstandards.org](mailto:publications@healthstandards.org)

Ms. Leslee J. Thompson  
Chief Executive Officer  
Health Standards Organization  
1150 Cyrville Road  
Ottawa ON K1J 7S9

Dear Ms. Thompson,

**Re: Proposed National Standard for Mental Health Services**

The Canadian Psychiatric Association (CPA) recently learned that the Health Standards Organization (HSO) has developed a proposed national standard for mental health services, which has now reached the public consultation phase.

We note that the draft standard states that “all HSO standards are developed through a rigorous process that includes a comprehensive literature review, consultation with a *standard working group or advisory committee comprised of experts in the field*, and evaluation by client organizations and other stakeholders” (emphasis added).

I am writing today to express the CPA’s concerns about the proposed standard, and in particular, about the composition of the advisory committee, which did not include any psychiatrists.

Psychiatrists are licensed physicians with extensive medical training in the causes, diagnosis, treatment and ongoing care of mental disorders in patients of all ages. Their medical training and expertise in psychological development allow psychiatrists to understand the interaction between the physical, social and psychological aspects of mental disorders. This training allows psychiatrists to appropriately prescribe medication, provide psychotherapeutic treatments, and work with patients, especially those with chronic or episodic conditions, to improve their quality of life. Often part of the treatment or rehabilitation plan will include referral to or collaboration with a range of social and support services, as well as with patients’ families. Psychiatry is an evidence-based profession, and as such, the CPA advocates for policies grounded on the best research evidence that allow the best possible mental health outcomes for Canadians.

Accreditation standards are important for shaping service delivery for mental health care. The CPA believes that it is arbitrary and irresponsible to develop standards for mental health care without the participation of psychiatrists given their deep knowledge about the needs of people with serious and persistent mental illnesses, and key role in delivering care. It is difficult to imagine a standard for surgery being developed without input from surgeons, yet this is what seems to have happened with respect to mental health.

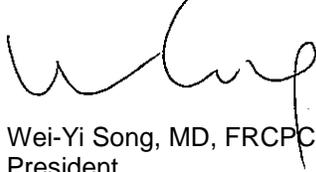
In general, the proposed standards minimize the impact of severe mental illnesses, and do not suggest needed services. There is no discussion about appropriate wait times or acceptable

numbers of acute psychiatry beds, and little about the importance of evidence-based treatments for those with serious mental illnesses or psychoeducation to help people understand, accept and learn to manage their illnesses.

There are practical issues associated with care and treatment for patients who experience remission of their acute symptoms when treated in hospital, but who repeatedly discontinue treatment when discharged. The proposed standards maintain that "recovery must be accomplished using the client's choice of services," yet refusal of treatment leads to deterioration in the person's clinical condition, and frequently results in involuntary rehospitalization. It can also lead to victimization, homelessness and incarceration.

While the proposed standards emphasize a strengths-based approach, it is important to remember that people require mental health care because of problems and symptoms. Canada's psychiatrists are committed to providing evidence-based care for people with mental illnesses, and feel that their input would have been invaluable in developing this proposed standard.

Yours sincerely,



Wei-Yi Song, MD, FRCPC  
President

- Cc. Dr. Biju Mathew, President, BC Psychiatric Association  
Dr. Melanie Marsh-Joyal, President, Alberta Psychiatric Association  
Dr. Gene Marcoux, President, Saskatchewan Psychiatric Association  
Dr. Leonard Schwartz, President, Manitoba Psychiatric Association  
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