



## The Educational Psychology Association of South Africa

### Presentation to the Parliamentary Portfolio Committee on Health regarding the National Health Insurance Bill

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[Educational Psychologists]

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### Who we are

- We are the largest, singular body specifically representing educational psychologists in South Africa
- Democratically constituted and elected
- Current signed-up membership: 680 +



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## Who we are

- **Our aims:**
  - to promote, maintain and protect the honour and interests of psychology and educational psychology as a profession,
  - to facilitate and promote the provision of quality psychological services to the people of South Africa.
  - to advocate for equitable mental health services for the South African population



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## Who we are

- EPASSA is supportive of the spirit of the NHI and UHC, including the drive towards ensuring all South Africans have equal access to quality healthcare
- Of particular concern to us is equal access to quality mental healthcare
- EPASSA acknowledges previous inequalities in access to healthcare services and the urgent need to create equitable healthcare services across all communities in South Africa

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## Overview of our submission

- EPASSA made a submission on the NHI Bill on 29 November 2019
- This presentation aims to highlight some of our most pressing concerns



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## Overview of our submission

1. **Mental health under the NHI and UHC**
2. **The role of educational psychologists in SA society**
3. **Educational psychologists under the NHI, including specific requests to the Portfolio Committee**



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## Mental health under the NHI

1. We do not believe that mental health is given the prominence it deserves in the NHI Bill
2. SA Human Rights Commission report (2017) states that there is currently considerable under-investment in mental health in SA
3. National Mental Health Policy Framework and Strategic Plan (2013 - 2020) (NMHPF) states that 'mental healthcare services should have parity with general health services'. This is not being realised



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## Mental health under the NHI

4. According to the WHO (2017) mental health is an integral and essential component of health; there is no health without mental health.
5. Goal 3 of the 17 United Nations Sustainable Development Goals (SDGs), in force since January 2016, explicitly notes the centrality of mental health and wellbeing to the overall health status of nations



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## Mental health under the NHI

6. It is essential that a national healthcare system caters for the provision of mental healthcare services at a primary (prevention), secondary (district hospital) and tertiary level (specialist hospital), as is the intent of the Mental Health Act, 2002.



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## Mental health under the NHI

7. Mental health interventions work best at the preventative, primary care level, where they can have the broadest impact and highest levels of success
8. Admissions to specialist hospitals can be significantly reduced through preventative care and thus access and funding to primary psychological interventions is essential
9. Investment in mental health has proved cost effective in the long run



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## Mental health under the NHI

**10.Improved mental health directly reduces physical illness**

**11.A society with optimal mental health will be more economically viable**

**12.South Africa is a traumatized society that is fractured and in distress, we need to prioritize mental health to heal as a nation and be free; not just politically but in our relations together and inside of ourselves** (South African Psychoanalytic Confederation)



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## Mental health under the NHI

**12.Mental health care at primary, secondary and tertiary level, including in and outpatient psychotherapy, for a wide range of mental disorders, must be covered by the NHI and not be left as a service to be covered solely by private medical schemes.**

**13.Psychotherapy (in and out of hospital) for a wide range of mental disorders, [as recommended by the WHO Special Initiative for Mental Health (2019-2023)] must be made a reimbursable service by the NHI fund**



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## Mental health under the NHI

14. Mental disorders that are covered by the NHI must not be limited to the list of Prescribed Minimum Benefit Conditions as stipulated in the Medical Schemes Act 131 of 1998, Section 29(1), but must be far broader, including neurodevelopmental disorders (which will allow for the psychological assessment of children), anxiety disorders, as well as trauma and stressor related disorders, such as Post Traumatic Stress Disorder.



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## Mental health under the NHI

We strongly believe that NHI and UHC presents a **golden opportunity** to create equitable and easily accessible mental healthcare for all South Africans; which will be a significant **national investment** towards building a **healthy society** and addressing a **multitude of psychosocial problems and social ills**

If this opportunity is missed, the consequences will be dire



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## Mental health under the NHI

Some social ills that can be alleviated through the provision of adequate mental healthcare include;

- **Suicide**
- **Substance use disorders**
- **Interpersonal violence**
- **Gender based violence**
- **Violence towards children**
- **Untreated trauma**
- **Teenage pregnancy**
- **High school-dropout rates and academic underperformance**

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## The Role of Educational Psychologists in SA

1. Educational psychologists are first and foremost psychologists, and are registered as health professionals with the HPCSA (we are not registered with the Dept of Education)
2. Educational psychologists share the same core competencies as clinical and counselling psychologists, which include:
  - a. The diagnosis and treatment of mental disorders
  - b. Psychological assessment
  - c. The provision of psychotherapy

Regulation 993 of 16 September 2008 read with Regulation R717 of 2006 (Health Professions Act 56 of 1974)



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## The Role of Educational Psychologists in SA

3. Educational psychologists are involved with broad areas of psychology. Some areas of activity for educational psychologists may include, but not be limited to the following:
- a. Preventative and primary care work, including school and community based preventative work
  - b. Assessments, including, psycho-educational, neuropsychological, medico-legal and forensic assessments
  - c. Interventions, including psychotherapy (individual, family & group therapy), and the treatment of psychopathology



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## The Role of Educational Psychologists in SA

4. Despite educational psychologists' extensive levels of training and experience, government appointed boards, like the Professional Board for Psychology, the Council for Medical Schemes and hospital boards consistently show a predisposition to exclude and sideline educational psychologists from rendering services in many areas where they are needed



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## The Role of Educational Psychologists in SA

5. We fear that this pattern of exclusion will recur in the NHI, as the Bill does not mention the pivotal role of educational psychologists within the healthcare system
6. It is incorrect and untrue that educational psychologists have a limited scope of practice and are less skilled in comparison to other categories of psychologists
7. There is no legal or factual basis for this incorrect assumption



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## Educational Psychologists under the NHI

- While particularly skilled in working at the level of prevention, educational psychologists must be included at all levels of service delivery under the NHI
- To exclude educational psychologists as legitimate providers of mental healthcare under the NHI (at all levels) would be to lose out on a **valuable national resource**



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## **Educational Psychologists under the NHI**

1. Educational psychologists should be included as:
  - a. Primary Healthcare providers, (Section 4.4 of the Bill) and be included in outreach teams (Section 4.4.3) and in school health services (Section 4.4.4)
  - b. Contractors providing services as part of the proposed contracting units (Section 4.6 & 4.7 of the Bill) in order to provide mental healthcare across all communities.



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## **Educational Psychologists under the NHI**

2. Educational psychologists should be able to register as healthcare providers, alongside clinical and counselling psychologists, and claim reimbursement from the NHI, and receive the same level of reimbursement as all other psychologists

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## **Educational Psychologists under the NHI**

**We would welcome further engagement with the Committee to discuss and refine the ideas presented in this submission in order to develop the provision of mental health services in the NHI**