



February 6, 2025

Yukon Health Professions Act Department

Sent by email to: hpa@yukon.ca

Thank you for providing the opportunity to submit input on updating the Health Professions Act (HPA).

**Introduction**

The CLHIA is the national trade association for life and health insurers in Canada. Our members account for 99 per cent of Canada’s life and health insurance business. The industry provides a wide range of financial security products such as life insurance, annuities, and supplementary health insurance. Our industry plays a key role in providing financial security to Canadians.



**Protecting 29 million Canadians**

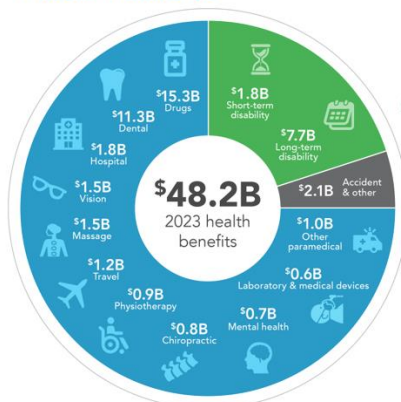
**27 million** with drug, dental and other health benefits  
**22 million** with life insurance averaging \$246,000 per insured  
**12 million** with disability income protection



**\$114 billion in payments to Canadians**

**\$44 billion** in health and disability claims  
**\$16 billion** in life insurance claims paid  
**\$54 billion** in annuities

**Health insurance**



Canadian Life & Health Insurance Facts // 2024 Edition

**2023 health insurance benefits by coverage type**



We have reviewed the information provided regarding the present state of regulated health professions along with the goals of improving the HPA. We support the recommendation to bring all health professions under the HPA and create a standard complaint process for all professions. Our members recommend separation of the professional associations from the regulator or college. In general, in provinces such as British Columbia, the professional associations represent the health care profession whereas the regulator or college represents the public and would handle complaints.

### **A complaints process that is fair, consistent, efficient, and easy to use**

The life & health insurance industry supports the goal to update the complaints process to be fair, consistent, efficient and easy to use.

We agree with the recommendation to make the complaints process the same for all regulated health professions in the Yukon.

We also suggest that the person filing the complaint has easy access to do so. For example, the ability to file a complaint against any of the regulated health professions in one place, with a simple online form (or the method of their choice), located on the government's website.

In addition, we recommend there are standards in place for the timeliness of complaints handling. This should include standard turnaround times for replying to the person who initiated the complaint, as well as timelines for providing updates throughout the process.

### **Developing a robust alternative complaint resolution process**

We agree that complaints should be publicly reported for the protection of consumers, allowing them to make informed decisions about their healthcare providers. Including the name of the health professional and the reason for the complaint, if it pertains to professional misconduct of a fraudulent nature, allows the insurance industry to investigate and suppress potential fraud. However, we understand that there are reasons to consider only publishing the report once the complaint has been resolved and if the provider is found to be at fault.

We also recommend that, if the provider is found to be at fault, the complaint information that is made public should include the provider's name, registration number, and the resulting disciplinary action.

### **Conclusion**

We appreciate the opportunity to share this input from the Canadian life and health insurance industry. The CLHIA would be happy to answer any questions to assist the Government of

Yukon as you continue to update the Health Professions Act. You may contact Sheila Burns, Director, Health and Disability Policy at [sburns@clhia.ca](mailto:sburns@clhia.ca).

Yours sincerely,

Sheila Burns  
Director, Health and Disability Policy  
CLHIA

C: Tracy-Ann McPhee, Health and Social Services Minister  
Matt King, Health and Social Services Deputy Minister