



Canadian Life & Health
Insurance Association
Association canadienne des
compagnies d'assurances
de personnes

September 16, 2024

Department of Health and Wellness
Prince Edward Island

Sent via email to: depthw@gov.pe.ca
nmhewitt@gov.pe.ca

Re: Consultation on Regulation of Podiatrists

The Canadian Life and Health Insurance Association (CLHIA) is writing on behalf of its membership to comment on the consultation issued for the Podiatrist Regulations.

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.



**Protecting 130,000
Prince Edward Islanders**

130,000
with drug, dental and other health
benefits
95,000
with life insurance averaging
\$220,000 per insured
50,000
with disability income protection



**\$368 million in payments
to Prince Edward Islanders**

\$167 million
in health and disability claims
\$68 million
in life insurance claims paid
\$133 million
in annuities

Life and health insurers work together with employers to offer access to a wide variety of health services through employer sponsored benefit plans. In 2022, about 130,000 Islanders had supplementary health insurance and \$130 million in health insurance benefits were paid. Based on survey data, we know Islanders value their benefit plans that provide them with access to prescription medicines, vision care, dental care, and mental health supports.

Podiatry services included in Group Benefit plans

The services of a podiatrist are commonly included as part of the paramedical coverage offered in most Group Benefit plans.

Podiatrists are also one of the healthcare providers who refer patients for foot orthotics. Custom made foot orthotics and orthopedic shoes are another common benefit included in Group Benefit plans.

Benefits of Regulation to Prince Edward Islanders

Decreased risk of harm:

Our members support the regulations outlined for podiatrists. Regulation provides a layer of oversight upon practice and an avenue for a patient to file a complaint with the knowledge that the regulatory college has the ability to discipline the member. Discipline can take many forms, depending upon the case, and results are posted transparently for the safety of other Islanders who may be considering treatment by the healthcare practitioner.

Unregulated health practitioners are not required to maintain liability insurance. Regulated providers require this as a part of licensure, protecting both patients and practitioners and providing a pathway to seek damages.

Code of ethics and standards of practice:

The creation of ethics and standards helps ensure practitioners have the professional knowledge, skills, values and experience to provide treatment safely, and serves to provide clarity and transparency to patients.

CRA and HSA eligible medical expenses

Residents of Prince Edward Island may benefit from a tax perspective if podiatrists are regulated. Section 22 of the Income Tax Act, 2024 provides a limited tax credit in respect of medical expenses as defined in section 118.2 of the Income Tax Act (Canada). The federal act defines eligible expenses to include the services of "medical practitioners", but only if such practitioners are regulated in the jurisdiction in which they provide services. We believe that it would be beneficial for residents of Prince Edward Island to also have access to this tax credit.

In addition, group benefit plans often include Health Spending Accounts (HSAs) which typically follow the same eligibility criteria as the CRA medical expenses. Therefore, if podiatrists are included in Prince Edward Island's regulated health professionals, claims for their services could be eligible under HSAs.

Conclusion:

Regulation of healthcare providers, such as podiatrists, helps to ensure that the services that they provide are delivered in accordance with accepted standards of practice, and this enhances the protection of the public generally.

Thank you for your attention to this important issue. We would be pleased to discuss this with your officials at their convenience or provide any other information as needed. Please feel free to contact me at 613-449-0679 or sburns@clhia.ca.

Yours sincerely,

Sheila Burns

Director, Health and Disability Policy
