



March 14, 2017

Ms. Sarah Hoffman  
Deputy Premier, Minister of Health,  
Alberta Health Services  
Executive Council  
423 Legislature Building  
10800 – 97 Avenue  
Edmonton, AB T5K 2B6  
Sent by email: [health.minister@gov.ab.ca](mailto:health.minister@gov.ab.ca)

Dear Ms. Hoffman:

On behalf of the Canadian life and health insurance industry, we are writing to raise awareness of the industry's continued concerns regarding the high cost of dental care in Alberta. The Canadian Life and Health Insurance Association is a voluntary association with member companies which account for 99 per cent of Canada's life and health insurance business. In Alberta, for calendar year 2015, the life and health insurance industry provided more than 2.6 million Albertans with private dental plan coverage and made payments of about \$1.3 billion on dental services. These plans help ensure Albertans have access to needed dental care.

We appreciate the Government of Alberta's leadership on this issue, and the response to both consumer and industry concerns. The initial steps announced in December 2016 help to provide Albertans with information on how they can help manage their costs, and the costs to dental plans through shopping around and comparing costs between dentists. In particular, the Government of Alberta's initiative in posting the most common dental procedures and average cost in Alberta is a positive first step. However, we believe more needs to be done.

Dental treatment fees in Alberta continue to be the highest in Canada, despite an economic downturn that has pushed down prices in other sectors such as oil. From 2005 to 2015, dental fees in Alberta increased an average of 5.6% each year, compared to BC that had an average increase of 2.6% each year and Ontario at 2.4%. While the pace slowed in 2016 to an increase of 2.6%. if we compare a basket of fees between Alberta, BC and Ontario, we see a marked difference in fee levels (the Alberta fee noted assumes the median fee):

<b>Service</b>	<b>BC</b>	<b>Ontario</b>	<b>Alberta</b>
11112 (2 units of scaling)	\$73.80	\$110.00	\$141.00
02142 (2 bitewing x-rays)	\$23.70	\$34.00	\$47.00
27211 (porcelain crown)	\$742.00	\$700.00	\$900.27
33131 (3-canal root canal)	\$786.00	\$775.00	\$1,146.83

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The industry remains concerned that without fundamental change, the cost of dental care will remain much higher in Alberta than any other jurisdiction in Canada and continue to put strain on the employers who provide these plans, and their employees. To sustain these plans, employers are increasingly making changes to plan design to require more out-of-pocket payments by employees through increased deductibles, lower maximums, and reduced coverage levels. While the posting of common procedures and related fees is a first step, it will not resolve the core issue as fees are based on current experience in Alberta, which remain significantly higher than other jurisdictions in Canada. In this regard, we encourage the Government of Alberta to consider a “reset” of fees to bring them more in line with the rest of Canada. We also strongly encourage that Alberta develop and publish an annual Dental Fee Guide, consistent with the rest of Canada to provide transparency and competition on dental fees in the Province.

We also remain concerned with the dual role of the Alberta Dental Association and College (ADAC) which serves as both the regulator and the advocate for the profession in Alberta. Most other provinces in Canada have recognized that these roles and responsibilities conflict and have put in place a model that completely separates association from regulator. The high cost of dental care in Alberta, and the demonstrated conflicts in the last few years within ADAC support the need for this separation of duties.

We thank the Government of Alberta for its response to this issue to date, and for the opportunity for CLHIA to assist in these efforts. Given that this is such a high priority issue for the industry, we would like to coordinate a meeting with your office where the issue can be explored further. We encourage continued efforts in this regard and remain available to assist where needed.

Regards,

Original Signed by:

Karen Voin  
Assistant Vice President, Group Benefits and Anti-Fraud

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