



December 16, 2016

via email

The Honourable William Francis Morneau, P.C., M.P.
Minister of Finance
Department of Finance Canada
90 Elgin Street
Ottawa, ON K1A 0G5

Dear Minister,

RE: Taxation of Private Health and Dental Insurance Plans

On behalf of Speech-Language and Audiology Canada (SAC) and over 6,300 communication health professionals across Canada, I am writing to express significant concern over recent media reports that the federal government is contemplating the taxation of private health and dental insurance plans. As the premier national organization representing speech-language pathologists, audiologists and communication health assistants, we strongly advise the government not to proceed with this taxation measure.

Private health insurance plans are essential to the health and well-being of people in Canada. Twenty-four million Canadians rely on private health and dental insurance plans to fill the gaps in coverage that exist in the public system. For example, speech, language and hearing services are vastly underfunded by provincial and territorial health-care plans. It is estimated that 1 in 6 Canadians has a speech, language or hearing problem, yet the services of our member professions are not fully covered by provincial and territorial health-care plans. This lack of coverage means that many people in Canada must either pay out of pocket for services to assess and treat their communication disorders or rely on group health-care benefits.

If the federal government were to proceed with the proposed measure to tax private health insurance plans in Canada, it's likely that many employers would reduce the amount of coverage they offer or eliminate their plans altogether. This will leave many low and middle income Canadians with no option but to pay out of pocket for essential health services and undoubtedly many will not be able to afford to do so.

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As the following statistics indicate, it is well worth investing in communication health services:

- 47% of Canadians between the ages of 15 and 64 who have a hearing limitation **report being unemployed**
- In Canada, boys with language impairment **have higher rates of arrests and convictions** than boys who do not
- Infants with hearing loss who are identified and receiving intervention **by the age of six months perform 20% to 40% better on school-related language** measures than children who are identified later on
- Up to **30% of children** with speech disorders also have a reading disability
- At least 30% of people suffer **loss of language (aphasia) after a stroke**
- Individuals with hearing loss are **2 to 5 times** more likely to develop dementia

Your government has committed to investments that strengthen Canada's health-care system and grow our economy, but enacting legislation that potentially erodes access to private health benefits undermines that objective. Any financial gain the government may achieve through this measure would be vastly offset by the decreased access to health care for millions of people in Canada. This would create an additional burden on the already overwhelmed public system and lead to increased wait times for vital health services.

Thank you for taking the time to consider the negative consequences of this proposed legislation. SAC welcomes the opportunity to meet with you in person to discuss this issue in more detail.

Sincerely,



Joanne Charlebois
Chief Executive Officer
Speech-Language and Audiology Canada

c.c. The Honourable Jane Philpott, P.C., M.P., Minister of Health
The Honourable Rona Ambrose, P.C., M.P., Leader of the Official Opposition