

**Written Submission to the House of Commons Standing Committee on Finance
Pre-Budget Consultations in Advance of the 2022 Federal Budget**



**CANADIAN DENTAL ASSOCIATION
ASSOCIATION DENTAIRE CANADIENNE**

Submitted by the Canadian Dental Association

August 2021

Recommendations

Recommendation 1: That the government continues efforts to provide dentists with cost-effective access to N95 respirators and nitrile gloves.

Recommendation 2: That the government moves forward with implementing the immediate expensing provisions in Budget 2021 for small business capital costs, with changes to ensure the provision: is retroactive to March, 2020 when dentists began making capital improvements and purchases to meet new infection control guidelines; benefits dentists who own the premises on which their office is located, in addition to those who lease their office space; and doesn't discriminate against dentists who run their offices as partnerships or sole proprietorships (as opposed to incorporated small businesses).

Recommendation 3: That the government maintains support programs to sectors still suffering from the economic impacts of COVID-19, such as dental offices still operating at reduced capacity.

Recommendation 4: That the government collaborates with the House of Commons Standing Committee on Health on a Parliamentary study on improving dental coverage for Canadians.

Recommendation 5: That the government invests \$600 million over the next five years in transfers to provinces and territories to support the maintenance and expansion of their publicly funded dental care programs, particularly those serving vulnerable populations.

Recommendation 6: That the government supports Canadians in making healthy food choices by immediately enacting new front-of-package nutritional labelling regulations for foods high in sugar and other nutrients of concern.

Recommendation 7: That the government supports healthy development of Canadian children by introducing legislation to restrict food and beverage marketing to children, in line with previous proposals, such as bill S-228 debated by the 42nd Parliament.

Recommendation 8: That, given the unique oral health challenges faced by seniors in care facilities and the importance of oral health to overall health, any new national standards developed for long-term care facilities include a standard relating to oral health.

Executive Summary

The Canadian Dental Association (CDA) is the national voice for dentistry, dedicated to the promotion of optimal oral health and to the advancement and leadership of a unified profession. CDA is a federation of Canada's provincial and territorial dental associations, representing over 21,000 practising dentists from coast to coast to coast.

COVID-19 has had a transformative impact on the health and wellbeing of Canadians. Despite the risks of disease transmission in dental offices, dentists have continued to provide important emergency and routine to their patients. While the pandemic has brought to light new challenges for the delivery of dental care, it has also exacerbated existing problems Canadians face in achieving and maintaining their oral health and in receiving dental treatment. The COVID-19 experience has also served as a reminder of the benefit of proactive health measures, such as promoting healthy eating, and ensuring the overall health of seniors in long-term care facilities.

The CDA is recommending a series of measures to support both dentists and the oral health of Canadians. This includes continuing efforts to ensure dentists and dental offices can provide access to dental care through the supply of cost-effective PPE like N95 respirators and gloves, equitable access to tax provisions offsetting the capital costs of new health and safety measures, and ongoing programs for small businesses, like dental offices, impacted by the pandemic. It also includes an in-depth study on improving the dental coverage for Canadians, while making investments in the interim to maintain and strengthen existing programs delivered by provincial and territorial governments. Finally, it includes promoting healthy eating - particularly for Canadian children - through front-of-package nutritional labelling as well as food and beverage marketing restrictions, while also ensuring that any new standards for long-term care facilities recognize that oral health is a key component of overall health.

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Support dentists and access to dental care as Canada transitions to life post-COVID

In response to COVID-19, new health and safety measures have been quickly adopted by dental offices across Canada. As a result, there are no known cases of COVID-19 transmission between practitioner and patient since the onset of the pandemic. However, these measures require enhanced safety protocols, additional personal protective equipment (PPE), purchase of new equipment, and office renovations. Providing dental treatment has become more difficult and more costly. As most dental offices are small businesses, and many dentists are small business owners, there are important steps the government can take to support dentists and dental offices, ensuring cost-effective dental care is remains accessible to Canadians.

While early on in the pandemic, dentists concerns about PPE centred on access, the challenge now is cost-effectiveness. The CDA recognizes the work done by the government in its bulk purchasing and distribution of PPE. However, finding items like N95 respirators and nitrile gloves at reliable, cost-effective prices remains difficult. Each person working in a dental office goes through multiple masks and many pairs of gloves each day. With N95 respirators costing many times the price of a traditional mask, and large fluctuations in the prices of gloves, this causes a considerable upwards cost pressure on dental treatment in Canada. **Consequently, the CDA recommends the government continues efforts to provide dentists with cost-effective access to N95 respirators and nitrile gloves.**

In addition to costly PPE, many dentists are facing significant capital costs to adapt their offices to new guidelines, which are likely to remain in place post-pandemic. Expenses such as erecting additional walls to better separate treatment areas, improvements to HVAC systems, and purchase of specialized air filtration or sanitizing equipment are just some examples. While the CDA applauds the inclusion of immediate expensing provisions for small business capital costs included in Budget 2021, many of our member dentists may struggle to take advantage of them because of their narrow scope. **The CDA therefore recommends that the government moves forward with implementing the immediate expensing provisions in Budget 2021 for small business capital costs, with changes to ensure the provision:**

- is retroactive to March, 2020 when dentists began making capital improvements and purchases to meet new infection control guidelines;
- benefits dentists who own the premises on which their office is located, in addition to those who lease their office space; and
- doesn't discriminate against dentists who run their offices as partnerships or sole proprietorships (as opposed to incorporated small businesses).

Finally, while dentist offices have largely been able to reopen to provide treatment to patients, they have not remained unscathed by the economic impacts of COVID-19, including cost pressures, cash-flow issues, and reduced patient volumes. Government programs, such as the wage subsidy, rent subsidy, and the emergency business account have been helpful to many dental offices. **The CDA recommends that the government maintains support programs to sectors still suffering from the economic impacts of COVID-19, such as dental offices still operating at reduced capacity.**

Improving dental coverage for Canadians

While Canada has one of the best oral health delivery systems in the world, many Canadians still face challenges in achieving and maintaining optimal oral health. Notably, a third of Canadians do not have dental coverage, and 20% avoid seeing the dentist due to the cost implications. While the CDA welcomes action from the federal government to improve dental coverage for Canadians, the CDA opposes recent proposals to immediately introduce a new, large-scale, federal dental care program. **Before the government moves forward with such a new initiative, the CDA recommends that they collaborate with the House of Commons Standing Committee on Health to study improving dental coverage for Canadians.**

Such a study should:

- look at ways of ensuring access to dental care for Canadians not already covered by employer-based plans or other publicly-funded programs;
- follow a framework of dental care in Canada continuing to be largely delivered by dentists in private settings; and
- focus on proposed programs that have a minimal impact on the majority of Canadians who pay for dental care via employer-provided plans.

The CDA recognizes the need for interim investments in existing programs providing dental coverage and access to dental care delivered by provincial and territorial governments. Based on data from 2015, \$846 million was spent by the public sector on dental services, of which \$542 million was spent by provincial governments. Federal support was largely dedicated to programs for Indigenous peoples; the RCMP, Canadian Forces, and veterans; prisoners; and refugees. Today these values likely approach \$1 billion and \$600 million, respectively. If the federal government was contributing at the same level to dental care as it was to the parts of the health care system covered by the Canada Health Act - roughly 22% - it would complement these provincial investments with \$170 million in federal funding annually. Accounting for the roughly \$50 million annually that supports surgical-dental services provided in hospitals, via the Canada Health Transfer, this leaves a gap of \$120 million annually.

The CDA therefore recommends that the federal government invests \$600 million over the next five years in transfers to provinces and territories to support the maintenance and expansion of their publicly funded dental care programs, particularly those serving vulnerable populations. Priority would be placed on serving populations with specialized needs (seniors, children, low-income, Indigenous, racialized, and disabled Canadians), public health education and prevention programs, and where required ensuring adequate payment for services that reflect the current costs of dental care treatment in that Province, which have increased due to COVID-19.

Supporting Healthy Eating

A balanced and nutritious diet is important for dental health. Otherwise, teeth and gums can become more susceptible to decay and gum disease. Sugar is one of the main causes of dental problems, such as dental decay, particularly in children. Dental decay itself is the most common childhood disease in Canada. The role of oral health in overall health is also important, and the impact of poor nutrition reaches well beyond dental concerns to diabetes and obesity. CDA supports measures aimed at promoting healthy eating, as well as those aimed at reducing consumption of so-called "junk foods" such as those high in sugar.

Therefore, the CDA recommends that the government supports Canadians in making healthy food choices by immediately enacting new front-of-package nutritional labelling regulations for foods high in sugar and other nutrients of concern. We understand that such regulations, developed following extensive consultations launched in 2016, are ready for enactment as early as this autumn.

The CDA also recommends that the government supports healthy development of Canadian children by introducing legislation to restrict food and beverage marketing to children. This legislation should be in line with previous proposals, such as bill S-228 debated by the 42nd Parliament. This bill, proposed by Conservative Senator Nancy Greene Raine, passed through both the Senate, and the House of Commons (with only minor amendments), but did not ultimately receive royal assent.

Oral Health of Seniors in Long-Term Care Facilities

The COVID-19 pandemic has had a disproportionate impact on older Canadians, particularly seniors living in long-term care (LTC) settings. While there was concern about the quality of care in these facilities pre-pandemic, the tragic loss of life in these facilities has spurred considerable discussion of the need to for new, national, long-term care standards.

Given the unique oral health challenges faced by seniors in care facilities and the importance of oral health to overall health, the CDA recommends that any new national standards developed by the federal government for long-term care facilities include a standard relating to oral health. Such a standard should include the following components:

- An oral health assessment by an appropriately trained and licensed/registered health professional upon admission and annually thereafter;
- Beginning as soon as possible after admission, a referral process to a dentist for examination, diagnosis and treatment planning;
- A daily mouth care plan that is implemented by appropriately trained staff; and
- Suitable infrastructure to support the appropriate delivery of needed care by the oral health care team.