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Via email: fin.minfinance-financemin.fin@canada.ca

August 21, 2020

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

Dear Minister Freeland,

On behalf of the Canadian Physiotherapy Association (CPA), which represents 15,000 physiotherapists, physiotherapist assistants (PTAs) and physical rehabilitation therapists (P.R.T.s), I wish to congratulate you on your appointment as Minister of Finance. As you and your government develop Canada's path to economic recovery in a world with COVID-19, please know that the CPA is here to assist in any way needed.

Canada's physiotherapy professionals provide essential care and treatment to Canadians enabling them to stay mobile, healthy, and active. The CPA believes that timely, efficient access to physiotherapy in all health care settings supports and safeguards the health of Canadians and the capacity of Canada's health care systems. Access to physiotherapy services remains essential as Canadians begin the transition away from the immediate response phase of the COVID-19 outbreak and begin the physical, economic, and societal recovery phases. To that end, we have developed the attached pre-budget brief outlining three key areas where federal government investments stand to enable better access to the treatment, health promotion, and disease prevention services physiotherapy professionals provide. The key recommendations are:

- 1. That the federal government increases investments in community, home, and residential care to meet the needs of our aging population and invests in a healthy and active aging strategy.
- **2.** That the federal government expands the current Student Loan Forgiveness program for rural/remote health professionals to include physiotherapists, P.R.T.s, and PTAs.
- **3.** That the federal government accelerates the timeline and increases investments in Canada's Connectivity Strategy to implement the infrastructure needed to ensure connectivity for health and remove barriers to access internet, phone, and electronic health technologies.

By improving access to physiotherapy professionals through these means, the federal government can better meet the needs of our aging population within their homes and communities, decreasing the reliance on more costly acute and institutionalized care. We encourage you to consider these recommendations as you develop the next stages of the government's economic recovery plan and the next federal budget.



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The CPA also appreciates the rapid and significant response by the Government of Canada to enact financial supports for Canadians experiencing economic hardship due to COVID-19. Unfortunately, there are still many physiotherapy clinics and businesses who are still unable to access financial support. By making a few additional changes to the Canada Emergency Wage Subsidy (CEWS) program, this valuable program can be extended to many businesses who need support to stay viable and can help Canadian workers transition from CERB back to the workplace.

Many physiotherapy clinics and businesses operate in a model which includes contractors and subcontractors. Because the CEWS does not consider contract service providers as eligible employees under the program, the applicability of the CEWS to physiotherapy clinics/businesses who operate under this model is limited. Changing the eligibility criteria of the CEWS to include contract service providers would help improve access to the program for physiotherapy clinics and businesses. As they are resuming operations, many of these businesses are facing significant revenue decreases due to reduced capacity within clinics and fewer appointments to maintain physical distancing, for example. By allowing businesses to include contract service providers within the CEWS program, they would have access to additional funds needed to bridge this difficult time.

This would also be a measure that would help transition self-employed physiotherapists from the Canada Emergency Response Benefit (CERB) and get them back to work providing physiotherapy services at a time when Canadians are feeling the impacts of reduced physical activity due to quarantine, isolation, and physical restrictions. The CPA has heard from many clinic owners that the exclusion of contract and subcontract workers is a barrier to their businesses rebounding to pre-pandemic operations. The longer that physiotherapy services cannot be accessed, the greater the risk that many Canadians will experience unaddressed limitations to mobility, slower healing, reduced access to pain management, and extended recovery times. Ensuring that physiotherapy services are available to support our communities as we begin to recover from the pandemic is essential.

Finally, we encourage the government to extend and make additional changes to the Canada Emergency Commercial Rent Assistance (CECRA) program, or to introduce a new program that provides direct support to small businesses struggling to meet commercial rental obligations. Recognizing the jurisdictional and multi-stakeholder complexities of the rent relief issue, we're concerned that the current structure of the CECRA program does not provide direct support to small business, takes the form of a loan rather than a grant, and has an extremely high qualification threshold. With some degree of physical distancing expected to be the new reality for some time, the number of patients that can come in the door is limited, in turn limiting potential revenues. Additionally, flexibility and accommodation on the part of landlords and commercial property owners is not universal, thus in many cases, dependency on the willingness of the property owner to incur debt is leaving small businesses in a precarious position. We encourage you to consider adjustments to the CECRA program which will enable physiotherapy businesses to access rent relief measures directly and for longer so they have the support needed to get through the ongoing financial hardships of the COVID-19 pandemic while continuing to care for their patients.



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The CPA encourages you to consider these recommendations as you chart the government's economic course through the next stages of the COVID-19 pandemic and beyond to the next federal budget. Again, congratulations on your appointment to the role of Minister of Finance. I would be pleased to meet with you at any time to discuss these recommendations or any ways in which the CPA can be of assistance.

Sincerely,

John-Paul (JP) Cody-Cox Chief Executive Officer

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