



Canadian
Physiotherapy
Association Association
canadienne de
physiothérapie

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Via email:

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April 17, 2020

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

The Honourable Mary Ng, P.C., M.P.
Minister of Small Business, Export Promotion and International Trade
Global Affairs Canada
Ottawa, ON K1A 0G2

RE: Canadian Physiotherapy Association calling for changes to Canada's COVID-19 Economic Response

Dear Ministers:

On behalf of the Canadian Physiotherapy Association (CPA), which represents 15,000 physiotherapy professionals and students across Canada, I would like to thank the Government of Canada for its rapid response to Canadians experiencing financial hardship due to the COVID-19 outbreak. I would also like to acknowledge the recent adjustments made to the Canada Emergency Response Benefit (CERB) to allow for some income to be earned and still qualify for the benefit, and to the Canada Emergency Business Account (CEBA) to adjust the income thresholds for qualification. While these changes will help physiotherapists who are able to continue caring for some patients during the COVID-19 outbreak and enable more clinics and businesses to qualify for loans, there are some remaining gaps in the government's financial support packages that stand to exclude many physiotherapists.

The CPA is concerned that in the absence of additional adjustments to current economic relief program, exclusion of many physiotherapists will in turn have downstream impacts to Canadians who need access to care now and in the coming months. For our members to have access to the financial supports required to ensure the clinics and valuable health services they provide in all settings will be able to survive this difficult time, we are requesting that you consider further adjustments to the CEBA and Canada Emergency Wage Subsidy (CEWS), and that you ensure the commercial rent relief program is flexible and able to provide direct relief to small business.

Changes to the Government's economic response now can help Physiotherapists help Canadians

In the case of both the CEWS and the CEBA, there are business model issues that stand to limit the applicability of the programs to many physiotherapists and other healthcare providers. In many community settings, physiotherapists and other health professionals are classed as contractors or sub-contractors rather than regular employees. This means that they won't meet the definition of employees as required under the CEWS to attain the wage subsidy. As well, some physiotherapy clinic owners pay themselves through dividends rather than a traditional salary, meaning they wouldn't necessarily meet payroll obligations to qualify for the CEWS or the CEBA. In both of these examples, the CEWS and the CEBA leave many physiotherapists out of financial supports due to definitions of earned income. We encourage you to broaden the criteria of the CEWS and CEBA to ensure that sole-proprietors, those whose income is through dividends, contractors and sub-contractors are eligible for support.



We appreciate the government's commitment to work with the provinces and territories to introduce the Canada Emergency Commercial Rent Assistance (CECRA) intended to provide some rent relief to small business. Recognizing the jurisdictional and multi-stakeholder complexities of the rent relief issue, we're concerned that the current proposed structure of the program is in the form of a loan, and that it does not provide direct support to small business. While access to credit may provide solutions to some businesses, for many clinic owners it only pushes the problem of fixed costs down the road. With some degree of physical distancing expected to be the new reality after clinics are permitted to reopen, the number of patients that can come in the door may be limited, in turn limiting potential revenues. Additionally, flexibility and accommodation on the part of landlords and commercial property owners is not universal, thus in some cases, dependency on the willingness of the property owner to incur debt to provide a rent deferral or reduction option stands to leave small businesses in a precarious position. We encourage you to consider adjustments to the CECRA program which will enable small businesses to access rent relief measures directly and as quickly as possible, rather than forcing them to rely on others.

Physiotherapists are here for Canadians

Physiotherapy clinics and individual physiotherapists need access to financial supports being provided by government to ensure they remain financially viable so they can continue to serve our communities as they recover from the pandemic. We have the opportunity to introduce commercial rent relief and to adjust the CEWS and CEBA now to enable physiotherapists to both continue to provide care for their patients and access the emergency income needed to get through the immediate financial hardships of the COVID-19 pandemic.

Physiotherapists are an integral part of the health care system, provide an essential service, and they play a key role in protecting, maintaining and improving the health and wellbeing of patients. I encourage you to recognize the critical role physiotherapists play during these difficult times by adjusting the criteria of these programs to ensure that physiotherapists and physiotherapy and health clinics providing valuable care to Canadians are not excluded. We look forward to continuing to support the government in its efforts to deal with COVID-19 pandemic and welcome any opportunities to contribute to its decisions and actions. Please contact us with any questions or if we can provide any further information.

Sincerely,

John-Paul (JP) Cody-Cox
Chief Executive Officer
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cc:
The Honourable Patty Hajdu, Minister of Health