

April 26, 2024

Hon. Kamal Khara, M.P.
Minister of Diversity, Inclusion and
Persons with Disabilities in Canada
140 Promenade du Portage
Gatineau, Quebec K1A 0J9

oma.org

Dear Minister Khara,

We are writing to express our concerns about the lack of information and potential unintended consequences related to the announcement in the federal 2024 Budget of the new Canada Disability Benefit. While the OMA supports the development of a new benefit for Canadians with disabilities, we must ensure any related requirements for physicians are designed with physician input so that they are as streamlined and user-friendly as possible and that physicians are compensated for their time.

We have a vague understanding of how this new program will be integrated into the current physician workload, and how we will offset the rapid influx of Disability Tax Credit applications it may elicit. This information must be made clear and available to the OMA and our members to ensure we can coordinate our efforts to best service Ontarians with the care they need, all while considering the rising administrative burden facing doctors.

Last December, we appreciated the opportunity to share our input in a preliminary consultation on the Canada Disability Benefit from a physician standpoint. However, with the release of the federal 2024 Budget, we must reiterate our concerns about the possible ramifications of the new Canada Disability Benefit.

As you may know, physicians are asked to complete forms for all levels of government and third-party organizations (e.g., insurance). These forms, combined with other administrative tasks, take family doctors 19 hours a week, on average, to complete, taking away time with patients and the well-being of Canadians. Many of these forms are unnecessarily burdensome, for example by not being integrated into a physician's electronic medical record, asking questions that are vague or subjective, and/or asking physicians to provide or verify information that is more appropriately provided by other allied regulated health-care professionals. The follow-up process with the physician, often facilitated by the patient, also adds to the administrative burden. Administrative burden is one of the top contributors to physician burnout that affects almost three-quarters of Ontario's doctors.

Our OMA Forms Committee has been in discussions with the Canada Revenue Agency over the past year on reducing the administrative and burdensome requirements of the Disability Tax Credit form. It is unfortunate that details of the new Canada Disability Benefit were announced before action was taken to simplify and reduce the burden of the form. Even though the government intends to enact the

legislation in June 2024, with payments to start in July 2025, physicians have already noticed an increase in the number of requests to fill out the Disability Tax Credit form over the past week.

Further, the OMA has no information regarding the line in Budget 2024 that indicates that funding would be provided “beginning in 2024-25, and \$41 million per year ongoing, to cover the cost of the medical forms required to apply for the Disability Tax Credit.” This lack of information has compounded the frustration of physicians.

Ontario is experiencing a crisis in family medicine that has left 2.3 million Ontarians without a family doctor. This figure is estimated to double in the next two years without action. We must commit to retaining and recruiting physicians for the sake of our province’s health-care system, and this is in part done by eliminating the unnecessary burdens that doctors experience in their workday.

We ask for clarity on your plans and that you consult with the OMA and other medical associations without delay to ensure the new program is rolled out in a way that does not negatively impact doctors and impede their ability to serve patients on a day-to-day basis.

We look forward to working with you and your teams collaboratively to address this issue.

Sincerely,



Kimberly Moran
CEO



Dr. Scott H. Elliott
Chair – OMA Forms Committee

Cc: Hon. Marie-Claude Bibeau, M.P., Minister of National Revenue