CMA recommendations to Employment and Social Development Canada on the new Canada Disability Benefit Regulations

CMA submission
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Introduction

The Canadian Medical Association (CMA) is pleased to submit the following recommendations to Employment and Social Development Canada (ESDC) as part of the Government of Canada’s consultation on regulations for the new Canada Disability Benefit.

The CMA commends the federal government's dedication to providing essential support for individuals with disabilities. It is the CMA’s firm belief that the success of this program for beneficiaries hinges on the efficiency and accessibility of the application process.

Physicians are dedicated to providing the best possible care to their patients. They already face significant paperwork and administrative tasks in their daily practice, and any additional burden may impact their ability to provide timely and quality healthcare services. It is crucial to consider and mitigate the impact of programs such as the new Canada Disability Benefit on health care professionals who play a pivotal role in their successful implementation.

Recommendations

1. Physician engagement

The CMA strongly recommends engaging physicians in the co-design of the application process if their involvement is intended.

It will be critical for the federal government to collaborate with professional associations and stakeholders in the medical field, such as the CMA and the College of Family Physicians of Canada, to incorporate physicians’ concerns and recommendations during planning and implementation. A collaborative approach will ensure more effective and physician-friendly solutions. This includes assessing whether physicians are the best healthcare providers for the process, evaluating the demands on both the applicant and the physician, and determining appropriate remuneration for providers’ participation.

Decision-makers should consult a variety of healthcare professionals, considering that physicians may not always be most appropriate health care providers to assess an applicant's functional abilities.
One example of inappropriate demand is a government entity asking physicians to certify the principal parent for the purpose of determining eligibility to receive child benefits.

2. **Clear eligibility criteria**

The CMA recommends that, to the greatest extent possible, that there be clear communication to patients on program eligibility, as well as clear information on the role of the applicant and the clinicians completing the form. This will reduce inappropriate requests. In many instances, the applicants should be able to complete most of the questions based on their own experiences.

3. **Streamlined documentation**

To ensure a more efficient and fair process for applicants, the CMA recommends designing application documentation with attention to minimizing complexity and completion time. This should include standardizing federal forms (e.g., standardizing dates such as day, month and year) and clear wording of questions to save time and reduce administrative errors. The physician’s role is to provide objective information on physical and/or psychological impairments and abilities, limitations and restrictions, for the purpose of administering programs or benefits. Questions on forms directed to physicians should be restricted to seeking such information.

A streamlined form will expedite access to benefits for applicants and alleviate the administrative burden on an already stretched healthcare workforce.

4. **Digital integration in EMRs**

The CMA recommends that ESDC explore opportunities to integrate the Canada Disability Benefit documentation seamlessly into existing electronic medical records systems (EMRs). This integration would not only reduce paperwork but also enhance accuracy and accessibility.

Appropriate digital integration with tools in use in the healthcare professional’s office will facilitate submission of the documentation and reduce paperwork. This will also expedite the process for both the physician and the applicant.

5. **Feedback mechanisms**

While physician engagement is required in the initial design of a new form or process that will involve medical input, it is also required on an ongoing basis to ensure the form or process is working well. The CMA recommends that feedback mechanisms be established to gather insights from healthcare professionals regarding the administrative processes associated with the Canada Disability Benefit. The CMA would be pleased to work with ESDC to co-develop an ongoing feedback mechanism for this purpose. This will allow for continuous improvement and adjustment of procedures based on real-world experiences. Such feedback mechanisms should also involve beneficiaries.
6. **Training and support**

The CMA recommends that the federal government provide paid and comprehensive training and support to physicians or other relevant health care professionals regarding the Canada Disability Benefit application and documentation process. This training can help minimize misunderstandings of program eligibility for both clients and clinicians, as well as avoid confusion for physicians in terms of their role in the process and how they can efficiently navigate the new requirements to better serve applicants. This will help reduce the administrative load on all parties involved (i.e., the client, the physician and the program administrator).

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**Conclusion**

The CMA appreciates the opportunity to contribute to the Government of Canada’s consultation process on regulations for the new Canada Disability Benefit. By proactively addressing these concerns, the federal government can enhance the success and efficiency of the Canada Disability Benefit while upholding Canada’s high standard of health care delivery. The CMA would be pleased to have further discussions on the new Canada Disability Benefit program and looks forward to a process that benefits applicants without placing an undue burden on either the applicants or the healthcare providers involved.