



October 17, 2023

Office of the Legislative Counsel
CIBC Building, Suite 802
1809 Barrington Street
PO Box 1116
Halifax, NS B3J 2X1

Email: Legc.office@novascotia.ca

Dear Chief Legislative Counsel,

Re: Bill No. 323 - Regulated Health Professions Act

On behalf of the Canadian life and health insurance industry, I am writing to encourage the province of Nova Scotia to create the Regulated Health Professions Act. By replacing 21 acts currently in place for self-regulated healthcare professions, there would be a common regulatory framework like those in the provinces of Ontario and British Columbia.

The CLHIA is a voluntary trade association with member companies that account for 99 per cent of Canada's life and health insurance business. In Nova Scotia, the life and health insurance industry provides some 760,000 Nova Scotia residents with supplementary health benefit coverage. In 2022, the industry reimbursed roughly \$180 million for paramedical and other healthcare goods and services - which includes the reimbursement for massage therapy services.

In addition to the 21 healthcare professions included in the proposed Regulated Health Professions Act, I encourage the province of Nova Scotia to consider making massage therapy a regulated profession. This would follow the lead of those provinces who have already regulated the profession (Ontario, British Columbia, Newfoundland and Labrador, New Brunswick), and other provinces (Alberta, Saskatchewan and Manitoba) that have recommended regulation or are considering regulation. Bill 323 would provide a better opportunity for the regulation of the massage therapy profession.

Group benefit plans include coverage for services of many of the healthcare professionals governed under the proposed Regulated Health Professions Act. In addition to providing greater clarity for insurers, regulation of healthcare providers helps to ensure that the services that they provide are delivered in accordance with minimum standards of practice, and this enhances the protection of the public generally.

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Section 22 of the *Income Tax Act, 2000* provides a limited tax credit in respect of medical expenses as defined in section 118.2 of the *Income Tax Act* (Canada). The federal act defines eligible expenses to include the services of "medical practitioners", including massage therapists, but only if such practitioners are regulated in the jurisdiction in which they provide services. We believe that it would be beneficial for residents of Nova Scotia to also have access to this tax credit as it would help mitigate some of the burden of seeking massage treatments.

Thank you for your attention to this important issue. We would be pleased to have this letter posted on the public website and distributed to members of the Law Amendments Committee. Please feel free to contact me at 613-449-0679 or sburns@clhia.ca if you have any questions.

Sincerely,

Sheila Burns
Director, Health and Disability Benefits