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August 4, 2022

The Right Honorable Justin Trudeau, P.C., M.P. Prime Minister of Canada Office of the Prime Minister 80, rue Wellington Ottawa, Ontario K1A 0A2

Subject: National Dental Care Program

Honorable Prime Minister,

On behalf of its 3,633 member dentists, the British Columbia Dental Association (BCDA) welcomes all efforts to enhance access to dental care for lower-income and vulnerable British Columbians that will ensure appropriately funded coverage for preventive and restorative treatments. Operating expenses, labour and fixed costs currently account for approximately 65% of dental offices' gross revenue.

Approximately 65% of British Columbians have access to private or public dental plans. Of the 35% without dental care, some have the means to support their own dental needs, however low-income adults and seniors have little access to coverage. Existing provincial dental plans provide basic coverage, but appropriate plan funding could not only improve coverage but also cover low-income adults and seniors' needs.

BCDA recommends that an appropriate dental plan which meets the needs of patients and dentists would have the following attributes:

- A provincially administered, federally funded dental plan would ensure coordination of the proposed federal dental plan with existing provincial public dental health programs as well as provincial dental plans.
- 2. The program recognizes 100% of the provincial suggested fee guide and permits Balance Billing (where the patient covers the difference between the dentist's and the plan's fees). The fee guide supports dental care by providing a common set of procedure codes, recognized by all private insurance companies (see #4) and reflects the cost of providing oral healthcare.
- 3. Program limits must cover the majority of patients' needs, both preventative and restorative, to facilitate treatment and efficient administration of a nationally funded dental plan. For those patients who require additional treatment due to medical conditions or extensive dental disease, an efficient pre-authorization process is required. This is especially important for children with rampant decay, frail seniors, cancer patients etc., where additional care can reduce the cost of emergency situations.



MEMBER OF THE CANADIAN DENTAL ASSOCIATION

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- 4. Administration of the program should be seamless and recognize current dental standards such that all patients' dental benefits are recognised across the country and there is coordination of patient coverage, especially where the patient is covered by more than one plan. This includes using the national system of coding, Uniform System of Code & List of Services, and national electronic billing system, ITRANS.
- 5. Coordinated plan to increase skilled labour for dental offices. Government effort and commitment will be required to address the existing shortage in skilled labour for dental offices (Certified Dental Assistants and Dental Hygienists) in order to meet the increased staffing demands of a federally funded dental plan.

On behalf of BC dentists, the BCDA believes that the above elements are essential in designing a provincially based national dental plan. If you have any concerns or questions, please have your office contact our Executive Director, Ms. Jocelyn Johnston at 604-736-7202 or executivedirector@bcdental.org.

Yours sincerely,

Dr. Samson Ng President

British Columbia Dental Association

Copy: Hon. Jean-Yves Duclos, Minister of Health

MP Jagmeet Singh, Leader, New Democratic Party