

April 30, 2024

The Honourable Mark Holland, P.C., M.P.  
Minister of Health  
70 Colombine Driveway  
Tunney's Pasture  
OTTAWA, Ontario  
K1A 0H5

The Honourable Dominic LeBlanc  
Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs  
269 Laurier Avenue West  
OTTAWA, Ontario  
K1A 0P8

Dear Ministers Holland and LeBlanc,

On behalf of Canadian employers, large and small, we are writing to express our deep concerns regarding the potential unintended consequences of the Government of Canada's proposed interpretation of the *Canada Health Act*.

Employers value the ability to support the health and wellbeing of their teams and families through access to virtual care offered through their employer benefit plans. Since 2017, this essential service has been a key factor in maintaining a healthy and productive Canadian workforce, especially for businesses with distributed workforces.

A proposed interpretation, aimed at eliminating out-of-pocket expenses for Canadians seeking care from nurse practitioners could inadvertently eliminate access to care that is paid for by their employer for approximately ten million Canadians. Employer-paid virtual care, a crucial component in providing care in Canada, is at risk of being discontinued unless an explicit allowance for employer-paid care is included in any interpretation to provinces from the federal government by way of an interpretation letter.

Virtual care has played a vital role in supporting the healthcare system, with employer-paid care serving as a cornerstone of this ecosystem. This model not only enhances healthcare capacity without taxpayer dollars but also ensures no consultation charge for the millions of individual Canadians who use it.

We support public healthcare in Canada and recognize the importance of guaranteeing universal access to health care without any charges to patients. The potential loss of access to employer-paid virtual care would have a significant impact on Canadian employers, employees, and our economy.

It is crucial to note that the Government of Canada can still achieve its policy objectives without the unintended consequences raised here. By accommodating employer-paid care in the interpretation letter, the government can ensure that access to supplemental care is preserved for millions of Canadians while ensuring that no Canadian is forced to pay out-of-pocket to see a healthcare professional.

Inadvertently banning employer-paid virtual care would strain an already burdened healthcare system and create substantial uncapped liabilities for provinces, ultimately compromising the quality of care for all Canadians.

As the Government of Canada progresses towards ending the practice of patients being charged for services delivered by nurse practitioners, we urge you to ensure that provinces can continue collaborating with employers to provide supplemental care for Canadians and their families.

We respectfully request your attention to this matter and urge the government to preserve the availability of employer-paid virtual supplementary care for the benefit of all Canadians.

Thank you for your consideration.

Sincerely,



**Goldy Hyder**  
President and Chief Executive Officer  
Business Council of Canada



**The Honourable Perrin Beatty**  
President and Chief Executive Officer  
Canadian Chamber of Commerce

c.c. **The Honourable Chrystia Freeland**  
Deputy Prime Minister and Minister of Finance

**The Honourable Randy Boissonnault**  
Minister of Employment, Workforce Development and Official Languages

**The Honourable François-Philippe Champagne**  
Minister of Innovation, Science and Industry Canada