

# ♥ Dialogue

## Canada's Competition Bureau Telemedicine Research Paper

### Context:

The Competition Bureau of Canada is consulting on factors that may be impeding access to digital healthcare, or limiting innovation and choice in Canada's health care sector. The Bureau has released a [discussion paper](#) and is seeking input on the following questions:

- 1. Are there ways that policies can better support innovation, choice and access to digital healthcare solutions? For example, do specific rules unnecessarily impact the ability to offer virtual products and services to Canadians? Please explain.**

Telemedicine adoption has rapidly expanded in response to COVID-19, providing continuing access to healthcare while maintaining social distancing.

Small and big employers are increasingly pressured to innovate to optimize the productivity of their human capital. The ever-increasing burden of health care cost on productivity and the increasing mental strain on Canadian workers needs to be countered by employer based innovation and digital solutions.

The reduced travel burden, missed appointment rates and decreased absenteeism makes telemedicine a cost-effective way to provide care to patients.

Policies that leverage telemedicine innovative digital solutions will improve access to timely cost effective care and increased portability of care while improving Canadian business productivity and competitiveness during this pandemic and beyond.

When analyzing and discussing costs, policymakers should consider a holistic view of the costs incurred and incorporate costs to patients and family caregivers, clinicians and other providers. These costs include avoided transportation costs, time spent scheduling, preparing for or waiting for a visit, missed work, child/elder care, missed appointments, and technology/infrastructure costs. Although a change in care modality may create new costs, policymakers should not examine these costs without considering "baked in" in-person costs. Opportunities to affect traditional costs not only includes substitution for in-person care, but also preventing more costly care, decreasing missed appointments and decreased care plan compliance contributing to downstream savings.

Generally speaking the potential issues of a permanent reimbursement of telemedicine consultations live around the notion and definition of telemedicine as "an insured service" which depending on its definition could have an impact on the ability for a third party, like an employer, and insurer or an organization, to cover the cost of access to telemedicine consultations which could be permanently reimbursed by a provincial government. It's important to note that not allowing insurers to cover the cost of telemedicine for their members would have a direct impact on small and medium companies which often don't have the means to offer this directly to their

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employees. Similarly, it could have an impact on the ability for a government's affiliated doctors to offer telemedicine consultations covered by a private third party.

For example, in Québec, telemedicine is generally excluded from "insured services", thereby allowing Dialogue's business model in the province. Depending on how telemedicine becomes insured, the services could continue to be offered through a contract with an employer, association or body, but not with an insurer or a financial institution, and not by participating physicians - which would limit access to virtual care for millions of Quebecers, especially those who can only have access through an insurance company, because of the small size of their employers.

## **2. What other barriers are impeding Canadians' access to virtual care and restricting innovation and choice in the health care sector? Can these barriers be reduced—and, if so, how—in order to facilitate the entry and expansion of digital solutions?**

The temporary adoption of billing codes by provinces to encourage telemedicine during the COVID-19 pandemic to meet the urgent need to ensure access to healthcare is a welcomed development. While telemedicine is not new, this accelerated adoption helps realize telemedicine's potential to deliver timely access to patient centered care. We should now see telemedicine as a natural evolution of health care into the digital age.

Payment innovation models as well as capitation based payment models should alleviate concerns with regard to quality of care, cost and integrity of these programs. Virtual care allows clinicians and patients to choose the most appropriate modality of care for their needs, increasing efficiency of care.

Nonetheless, the adoption of virtual care does not increase the overall capacity of the system or increase the availability of healthcare after hours or on weekends and there is no data to suggest that it will decrease wait times or increase timeliness of care provided by family medicine clinics. Integrating virtual care modality in a family medicine unit will increase available modalities to deliver the same care in more efficiently.

Employer based innovative virtual healthcare solutions have been shown to decrease absenteeism by providing extended after hours access to healthcare and mental health. These initiatives also decrease barriers to consult, the burden of commuting and waiting and overall enhance wellness and productivity. Increased behavioural health access and utilization during the pandemic is a good example of meaningful increased access that improves outcome while reducing unnecessary future costs and harm.

Increased availability of virtual care through employer-based innovation has also highlighted the limitations of portability of care between provinces resulting from provincial licensing regulations. These interprovincial restrictions need to be re-evaluated in the context of Canada wide deployment of digital healthcare solutions.

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### **3. What measures have other jurisdictions taken to improve access to virtual care? How have barriers to innovation and choice been eliminated, while balancing legal and regulatory requirements in the delivery of digital health care solutions? Can similar measures be adopted in Canada? Why or why not?**

In the US, the VA has been an early adopter in virtual care and is seen as a leader. It has faced multiple challenges confronting the COVID-19 pandemic because of its large size, the high disease burden of its patient population, its geographic distribution and the added challenge of the inequality and highly diverse settings of its patient population. Some lessons learned that are applicable in Canada include:

- The ability for clinicians to practice across state lines was foundational to the VA's ability to mobilize a national telehealth response to COVID-19.
- The biggest acceleration in telehealth care use occurred in mental health.
- Payment models can be adjusted to favour utilization that improves outcome.
- The realization that the health care needs are outpaced by the VA's abilities to increase the supply which prompted the VA MISSION Act establishing new digital innovative partnerships to expand access to VA telehealth services.

### **4. What impact has the COVID-19 pandemic had on innovation and choice in Canada's health care sector, and on Canadians' ability to access health care virtually? Have any barriers hindered the adoption of digital solutions in response to the COVID-19 pandemic? Please explain.**

The COVID-19 pandemic has changed the way medical professionals provide access to care. The COVID-19 pandemic has changed the paradigm of Canadians' access to healthcare and ushered in a new era of telemedicine. Almost overnight, patients stopped going to doctors' offices and instead received medical care through online platforms.

As noted above, it is critical that regulators across the country, not only continue encouraging the use of telemedicine in the public healthcare system, but also continue allowing and encouraging telemedicine to be offered by employers, organizations and insurers to improve the health and mental health of the Canadian workforce, especially as it recovers from the COVID-19 crisis.

Innovative Canadian virtual healthcare companies have played a significant role throughout the pandemic. Virtual healthcare companies have leveraged their technology to provide continuous access to health care while promoting social distancing during this crisis. By supporting Canadian business and providing 24-7 bilingual Canada wide physical and mental health Canadian virtual care providers provide an innovative solution that complements the Canadian public health care system while providing increased access and portability of healthcare.

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Incentivising employers offer telemedicine services will improve the health of the Canadian workforce but also improve their competitiveness through COVID and beyond. It will also decrease the pressure on the public health system and contribute to improved timely access.