



August 12, 2015

Via E-Mail

Doug Hughes

Assistant Deputy Minister | Health Services Policy & Quality Assurance Division

[Doug.Hughes@gov.bc.ca](mailto:Doug.Hughes@gov.bc.ca)

Dear Mr. Hughes,

As representatives of our service provider members, and after consultations with the Canadian Association of Occupational Therapists-BC Chapter and the Home Medical Equipment Dealers Association of BC, we are requesting a delay in the full implementation of the revised wheelchair policy announced by the Ministry of Health earlier this year.

Representatives from the four associations have met to discuss the new policy and have serious concerns regarding its implementation. These include, but are not limited to:

- Not all care providers will be in a position to fully implement this policy due to a number of factors such as limited storage space and a lack of access to a sufficient number of “basic” wheelchairs as defined in the new policy.
- Full implementation of this policy will result in significant new costs for both health authorities and non-government care providers.
- We are unaware of any detailed cost/benefit analysis related to this implementation of this new policy.
- There is no plan in place to ensure care providers are provided funding on annualized basis for incremental cost increases which are a direct result of this policy. Therefore, in order to implement this policy, it may be required that funding be redirected from direct care.
- There are serious concerns regarding the actual definition of a “basic wheelchair” as proposed in the policy.

Our associations are currently working to come up with several key recommendations to the Ministry which we believe will make the policy more workable, cost-effective and deliver better health outcomes for seniors.

Given the complex nature of the policy and our need to determine the full impact once it is implemented, we are requesting a delay of any enforcement measures until at least January 1, 2016. We believe this would afford the Ministry the opportunity to review our recommendations and consider them for possible implementation.

As valued partners in the delivery of quality seniors care, we hope you will give serious consideration to our request. In that regard, in order to provide some certainty for care providers who are already beginning to undertake additional capital and operating expenses, we hope you can respond to our request at your earliest convenience.

Sincerely,



Daniel Fontaine  
CEO, BC Care Providers Association



Susan House  
ED, Denominational Health Association