

October 9, 2020

Mr. Matthew Boswell  
Commissioner of Competition  
Competition Bureau  
Place du Portage I  
50 Victoria Street, Room C-114  
Gatineau, Quebec  
K1A 0C9

**RE: Public consultation -- supporting innovation and choice in Canada's health care sector**

Dear Mr. Boswell:

On behalf of CHIEF Executive Forum, we are pleased to respond to the invitation to share views and insights on factors that may be impeding access to digital health care and limiting innovation and choice in Canada's health care sector.

The intent of our letter is twofold: first, to introduce CHIEF Executive Forum as a trusted source for digital health leadership insight, and second, to extend an invitation to you and your team at the Competition Bureau to meet with CHIEF Executive Forum to discuss the agenda for the effective use of digital to improve health and healthcare in Canada.

CHIEF Executive Forum will be pleased to help you reflect on key areas of focus for your market study and to identify and collaborate on opportunities for advocacy in the health care sector.

**Background**

Our CHIEF Executive Forum members agree that the Bureau's market study – examining how to support digital health care across Canada through pro-competitive policies – is necessary and valuable at this time. It aligns with our work to envision, inform, and implement the future of health in our digital world. Canada's Health Informatics Executive Forum (CHIEF) is an interactive, trusted environment for senior professionals and leaders in digital health and healthcare. We bring the collective experience and momentum of more than 150 executives and leaders from public and private sector across Canada to help in the effort to deliver innovative solutions and approaches in healthcare today. CHIEF is Canada's largest collaborative group of public-private sector digital health leaders that meets regularly to tackle complex challenges that impact regionally and

nationally, identify and exchange best practices, and offer expertise to government and system stakeholders in setting the agenda for the effective use of digital to improve health and healthcare in Canada.

CHIEF members work at the helm of leading Canadian organizations across Canada – focused on the complex challenges and opportunities in delivering health services to Canadians in our rapidly evolving digital world. CHIEF understands how instrumental digital solutions can be in meeting Canadians' health care needs – especially through the past six months during the COVID-19 pandemic. And, as a collective group of public-sector and private-sector leaders CHIEF has taken steps to support the expansion of virtual care and mental health tools across the country.

### **Virtual Care in Canada: CHIEF is developing foundational supports**

Now, more than ever before, Canadians are aware of opportunities to access and advance their health in a digital world: virtual health delivery has been deployed rapidly and widely, public health data and informatics has moved into mainstream conversation, and the “digital first” approach has become a necessary mindset adopted by many sectors, organizations, and citizens in Canada.

At our CHIEF Spring Symposium meeting, we began an initiative together to support the national virtual care agenda in Canada. CHIEF Executive Forum leaders have identified key challenges and opportunities that exist across all jurisdictions as a result of accelerated adoption and deployment of virtual care services due to COVID-19, including:

- Lack of common lexicon to describe virtual care services across Canada
- Gaps in standardized approaches to deployment of virtual care and continued re-learning of the same lessons across jurisdictions
- Workflow challenges for clinical, operations, and technical professionals as well as patients and family caregivers
- Few tools available to assist professionals and patients with information, skills, and education related to use of virtual care services

CHIEF Executive Forum members envision immediate action to unleash the full potential of virtual care within a hybrid service delivery system and are prepared to provide advice for the promotion of innovation and choice to support the work ahead. Under the guidance of CHIEF Advisory Committee, two national working groups are convening to develop resources that will support digital health and virtual care in Canada. The following key deliverables are in development to maintain the gains made over the past several months and continue progress into the future. These include:

Virtual Care in Canada: A Lexicon and Maturity Model Framework (Virtual Care Working Group) will provide:

- **Canadian Lexicon** of virtual care and sub-domain areas
- **National Maturity Model** to describe stages of maturity in deployment of virtual care

- **Capacity Building** for stakeholders using virtual health
- **Education Resources** in collaboration with other national organizations

Combined, these shared resources developed by the Virtual Care Working Groups will provide jurisdictions with a roadmap and business case to accelerate the effective deployment of virtual care solutions. And, through the collaborative use of the published lessons learned from organizations who have already done the work, CHIEF-led organizations will create alignment, direction, and decision-support in virtual care across the country. The result will be sustained innovation and more options for Canadians to engage with their health providers in convenient, cost-effective ways that yield quality outcomes for the patient, provider, and health system.

The CHIEF Executive Forum will be pleased to meet with you further to discuss key principles that will support digital health care in Canada through pro-competitive policies. Below we have listed key principles that CHIEF Executive Forum sees as critical enablers for greater innovation, choice and access to digital health care across Canada.

#### **Key Principles to support innovation and choice in Canada’s health care sector:**

- **Choice**
  - Patient and family caregivers as key stakeholders should have options in choosing how and where to access their care and information through a variety of virtual and face-to-face options
  - Care providers should be given the choice of virtual care solutions that best meet their needs. This means having the ability to unbundle add-on virtual modules from clinical system providers and integrate best in class virtual care solutions from any vendor.
- **National standards**
  - In order to foster a robust market we have learned through the physician office EMR experience that a provincially based standard approach results in a fragmented market and sub-optimal solutions.
  - Having national standards for the industry to develop solutions for means that vendors can develop and sell solutions across all jurisdictions in Canada. In so doing their development costs are reduced (one standard not ten) and the cost to the customers are reduced accordingly. Competition is increased, differentiation is then based on functionality and user experience rather than standards compliance, and vendors can elevate the industry accordingly.

- **Quality control**

- With national standards in place, an entity may then have the mandate to assess compliance with standards. The result would be a “Good Housekeeping seal of approval” that would give buyers confidence that the solutions they consider and the ones they ultimately choose have passed the standards and integration test.

- **Integration**

- Virtual care solutions cannot continue to be standalone silos of functionality and information. Data from EMRs must be accessible to the virtual care solution, results from the virtual care episode must be recorded in the EMR, and care protocols must be contiguous.
- Jurisdictional and organizational silos create challenges for Canadians to gain access to virtual care. Policy shifts should enable alignment of vision and implementation and promote harmonization of policies and regulations at national level.

- **Promote Public-Private Partnership**

- Take an innovation procurement approach based upon “co-design” collaboration approaches. This will help address challenges inherent with risk-averse culture that at times values short-term investments and cost-containment over long-term investment and continuous improvement.
- Shift to procurement innovation approach for long-term mutual benefit and risk-sharing and promote a policy and regulatory environment that recognizes patient safety and innovation as combined objectives rather than positioning as conflicting goals.

- **Funding**

- Federal funding may be effectively invested in establishment of the data and integration standards, secure provincial buy-in and momentum for change, and operate the compliance body and certification process.

Our CHIEF Executive Forum members welcome the opportunity to discuss the modernization of policies to further support the development and deployment of virtual health care products and services.

We extend an invitation to the Competition Bureau to meet with CHIEF Executive Forum to discuss the necessary changes to policies to support Canadian market development and new ways to deliver health care services. Furthermore, CHIEF Executive Forum members are a unique national coalition that can help to shift policy and mindset around virtual care acceleration and to drive momentum and support for policy and innovative approaches to transform the health care system.

Together, CHIEF Executive Forum members will advocate for change and deliver insight and experience to the Bureau to support your efforts related to innovation and choice in Canada's health care sector. And, importantly, we bring leaders and change-makers from across the digital health industry and ecosystem to collaborate on this important initiative. We invite you to meet with us to discuss the agenda for the effective use of digital to improve health and healthcare in Canada.

Yours sincerely,



Mark Casselman  
Chief Executive Officer  
Digital Health Canada

CC:

Dave Wattling, CHIEF Advisory Committee  
Elizabeth Keller, CHIEF Advisory Committee

CHIEF EXECUTIVE FORUM MEMBER ORGANIZATIONS

