

Written Submission to the Finance Committee for the 2026 Pre-Budget Consultations in Advance of the Upcoming Federal Budget

The Canadian Association of Optometrists

August 2025

**Recommendation 1:** That the Government of Canada prioritizes the vision health of all Canadians through the support of the implementation of a National Eye Care strategy.

**Recommendation 2:** That the Government of Canada act on expanding the list of eligible occupations under the Canada Student Loan Forgiveness Program to include optometrists to effectively address the access to care challenges faced by people who live in rural, remote, or sparsely populated areas and Indigenous communities.

**Recommendation 3:** That the Government of Canada invest in system modernization and efficiency improvements for federal programs providing vision care services

This submission highlights Canadian optometrists' willingness to collaboratively contribute to a thriving economy and a healthy population. Optometrists are keenly aware that, in Canada, 90% of vision loss is treatable or preventable<sup>1</sup>. By demonstrating real leadership in providing better vision for all Canadians, optometrists are adeptly positioned to address economic concerns such as productivity, employability, and mobility. Insufficient access to vision care services hinders many Canadians from reaching their full earning and educational potentials.

The Canadian Association of Optometrists is the national voice of optometry. Optometrists are independent primary health care providers and represent the front line of vision care. Optometrists practice in a range of settings: most work in private practice, others work in general practice clinics, hospitals, community health centres, corporate optometry, research, teaching and administration.

Recommendation 1: That the Government of Canada prioritizes the vision health of all Canadians through the support of the implementation of a National Eye Care strategy.

On November 7, 2024, Bill C-284, "An act to establish a national strategy for eye care," received royal assent. The creation of a comprehensive strategy has the potential to

<sup>&</sup>lt;sup>11</sup> The Lancet Global Health Commission on Global Eye Health: vision beyond 2020 Burton, Matthew J et al. The Lancet Global Health, Volume 9, Issue 4, e489 – e551

bring significant positive changes to vision care in Canada. The Government of Canada should ensure that it has the necessary budget to create and implement an evidence-based strategy through broad consultations with both vision health providers and individuals with lived experience. In particular, the strategy must ensure that the voices of Indigenous people and those most vulnerable to vision loss are represented.

A January 2023 Abacus Data poll demonstrated that 67% of Canadians supported an increased role of the Federal Government in eye health and vision care. Furthermore, 77% of Canadians supported the notion of a federal eye health strategy. This strategy would ensure Health Canada could rapidly consider new applications for treatments and devices used to treat eye conditions. It would also promote research and improve data collection on eye disease prevention and treatment. Additionally, it would enhance vision care access for underserved populations, including Indigenous peoples and lower-income households. Finally, it would promote information and knowledge sharing between the federal and provincial governments regarding eye disease and prevention. While long overdue, the Government of Canada can demonstrate real leadership in vision care. Through the wellness and prevention mandate at the Public Health Agency of Canada, a National Vision Strategy would establish measurable goals to close the gaps in health outcomes relating to vision care.

We believe that a well-crafted and adequately funded implementation of a national strategy will not only enhance the quality of life for Canadians but also contribute to a more efficient and accessible vison care. By increasing funding for made in Canada research, promoting awareness, and improving access to essential eye care services, we can reduce the burden of eye-related health issues on individuals, and relieve some of the weight already harbored within our healthcare system.

Recommendation 2: That the Government of Canada act on expanding the list of eligible occupations under the Canada Student Loan Forgiveness Program to include optometrists to effectively address the access to care challenges faced by people who live in rural, remote, or sparsely populated areas and Indigenous communities.

While we acknowledge the Government of Canada's promise to expand the program in its 2024 budget, it is crucial to emphasize that including optometry in the program is long overdue. This inclusion is essential to ensure that Canadians across our vast country can access the care they need.

Optometrists, as primary eye care providers, play a vital role in delivering timely health services and ensuring the overall wellbeing of Canadians. Eye health is integral to overall

health, and expanding the program to include optometrists would support access to vision care in rural and remote communities.

Currently, more than 1.2 million Canadians live with vision loss, and over eight million are affected by one of the four major eye diseases: glaucoma, diabetic retinopathy, agerelated macular degeneration, and cataracts.<sup>2</sup> Blinding diseases impact older adults (55+) at much higher rates, and as Canada's population ages, the number of individuals with vision impairment will rise.

The Government of Canada has a significant opportunity to act now by including optometrists in the Canada Student Loan Forgiveness Program. This move would effectively address the access to care challenges faced by people living in rural, remote, or sparsely populated areas. As stated in the 2023 federal budget, one way to encourage younger generations to relocate to these communities is to provide student debt relief. The cost of studying optometry in Canada is close to \$100K<sup>3</sup>, and nearly double for those who study in the USA. Given this substantial financial commitment and the essential role optometrists play in vision care, it is equitable that they receive a commensurate level of student loan forgiveness, like the support provided to other Health and Social Services Workers.

Canadian optometrists are eager to contribute to health equity and wellbeing for all. Student loan forgiveness is vital to facilitate the recruitment and retention of optometry professionals in these regions. It is imperative to broaden this program's scope to include optometrists and address the pressing need for improved access to vision care for people living in rural and remote communities.

## Recommendation 3: That the Government of Canada invest in system modernization and efficiency improvements for federal programs providing vision care services.

To meet growing demand and ensure sustainability, Canada must address two interlinked challenges: the erosion of provider capacity due to inadequate reimbursement and the inefficiencies caused by excessive administrative complexity. Together, these factors lead to reduced access to care, rising costs, and burnout among professionals delivering frontline services.

<sup>&</sup>lt;sup>22</sup> Fighting Blidness Canada, "Cost of Vision Loss and Blindness in Canada Report"

<sup>&</sup>lt;sup>3</sup> The Canadian Association of Optometry, "Becoming a Doctor of Optometry"

The Non-Insured Health Benefits program (NIHB) and the Interim Federal Health Plan (IFHP) are complex and bureaucratic, and it is difficult to communicate with the decision-makers or get clear and timely responses. Healthcare providers who service these programs must deal with additional paperwork, confusion on approvals or preapprovals and low reimbursement rates that do not match the care required to provide for the populations covered under these programs. These issues lead to additional time, costs, and inefficiencies both for service providers and for governments running the programs. For example, the calculation for service fee reimbursement across federal programs is not transparent or clear. This leads to frustration and confusion for healthcare providers and program administrators.

We are aware that the Government of Canada recently provided a response to the "Standing Committee on Aboriginal Affairs and Northern Development report "Moving Towards Improving the Health of Indigenous People in Canada: Accessibility and Administration of the Non-Insured Health Benefits Program". However, lacking in the response is acknowledgement of the frustrations by communities to retain or recruit health professionals and the response does not include efforts to recruit health professionals to serve NIHB clients especially those who are opting out of the program.

By pairing increased reimbursement with strategic reforms such as reducing paperwork and modernizing approval systems, governments can unlock meaningful improvements in service delivery, access, and accountability.

The CAO thanks the finance committee for their consideration of our budget 2025 recommendations.