

January 17, 2023

**Office of the Deputy Premier and Minister of Health
777 Bay Street, 5th Floor
Toronto ON
M7A 1N3**

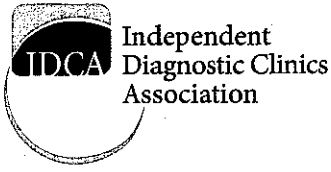
Dear Deputy Premier and Minister of Health Jones:

The Independent Diagnostic Clinics Association of Ontario ('IDCA') is making this submission on behalf of the province's independent health facilities ('IHF') sector. The IDCA represents the interests of the approximately 1,000 community-based diagnostic imaging and surgical IHF clinics in Ontario. IHFs perform approximately 50% of all medical and diagnostic imaging studies conducted in Ontario.

The IDCA applauds the Government's recent announcements regarding the expansion of certain diagnostic and surgical services in IHFs. We understand that this is to be a multi-phased process. We agree that this is a step in the right direction in helping reduce both wait times for procedures and the current surgical backlog.

The IDCA believes, however, that these changes must be effected having regard to the needs of existing providers. Specifically, we are concerned about the Government's announced plans to encourage the re-training of existing MRTs to become MRI technologists. There is a great danger that this initiative will exacerbate the staffing shortages that have plagued IHFs and hospitals alike since the start of the COVID-19 pandemic.

While we understand that increasing access to MRI is an important policy initiative on the part of this Government, we do not believe that it should be effected at the cost of imperiling the delivery of care generally. While there is an undoubted shortage of MRI technologists, there is an equal scarcity of technologists in several other areas of imaging. IDCA members are concerned about the focus on building numbers of MRI technologists. Their concern is that the re-directing of existing MRT's in other modalities towards MRI will come at the cost of crippling the ability of Ontario's providers, particularly in IHFs, to meet the already overburdened demand for ultrasound, x-ray, mammography and CT services. Accordingly, we believe that the 'solution' put forward by Government must include the training of many more technologists, in all modalities, and the creation and accreditation of more training colleges.



We understand that the health and human resource (HHR) issues facing Ontario's public healthcare system will not be solved quickly. It takes time to build the numbers and the necessary infrastructure to solve our HHR needs. In that regard, we would recommend that Government look at ways of streamlining the path of applicants/students to completing their training and obtaining MRT status. We would be pleased to discuss the matter with you.

The IDCA remains very supportive of the Government's plans to expand the scope of services performed in IHFs. We believe that with the added pressures of an aging and increasing population, the *status quo* regarding the delivery of care cannot be maintained. IHFs have and will continue to represent high quality and lower cost provision of healthcare services for Ontarians.

We thank you for the opportunity of presenting this submission to you. Please feel free to contact Gerald Hartman, President of the IDCA, to discuss the foregoing.

Sincerely,

The Board of Directors of the Independent Diagnostic Clinics Association
by its representatives:

Gerald Hartman, Director

Dr. Jason Hartman, Director

c.c - Alex Millier and Roslyn Roelofsen, Stakeholder and Member Relations, Office
of the Deputy Minister & Minister of Health
- Owen McMorris, Manager, Independent Health Facilities Program, Ministry of
Health