



A B O U T F A C E®

April 20, 2022

The Right Honourable Justin Trudeau, P.C., M.P.
Prime Minister of Canada
Langevin Block
Ottawa, ON K1A 0A2

Dear Prime Minister,

AboutFace, Canada's only national facial difference charity, noted with interest the recent news regarding a proposed national dental care plan.

For more than 35 years, AboutFace has worked with and for the facial difference community in Canada. More than two million people in Canada are living with a facial difference. A person with a facial difference refers to anyone whose appearance, from the neck or above, has been affected by a congenital (from birth), acquired (after birth), or episodic (comes and goes) condition or syndrome.

Our mission focuses on cultivating equity and opportunity for individuals with a facial difference through supportive programming, advocacy, and education.

This correspondence aims to bring to light potential gaps in coverage under the proposed national dental care plan, for members of the facial difference community in Canada.

Several news articles have noted that the plan aims to provide coverage to families with an annual income of less than \$90,000, for which there would be a co-pay responsibility for the families; those families earning less than \$70,000 would be fully covered. We note the plan is to phase-in coverage over three years, including coverage for children, the elderly, and people with disabilities.¹

For people with facial differences, basic and specialized dental treatment can be costly and frequent. Often people with facial differences will receive ongoing care and specialized treatment at more frequent intervals than people without facial differences, due to the nature of specific conditions.

According to the 2020 AboutFace community survey, 37% of adults with facial differences reported ongoing concerns regarding access to dental care, with 36% of parents reporting access to care issues for their children with facial differences.

At the AboutFace office, each month we receive queries from community members, or family members across Canada, regarding access to dental care issues. These calls are mainly focused on orthodontic treatment, adults requiring retreatment of procedures done as children, implants,

AboutFace

51 Wolseley St, Toronto, ON M5T 1A4 | 1-800-665-3223 | 416-597-2229 | info@aboutface.ca
Charitable Registration #: 126761410RR0001

dentures, and insufficient general dentist knowledge of treating complex oral health needs due to a person's facial difference and the need for access to specialist care.

In addition, people with facial differences often encounter systemic barriers related to employment, psychosocial health and well-being, and stereotypes and misperceptions about what it means to live with a facial difference.

- Of note, in our 2022 community survey, 7.5% of facial difference community members reported being unemployed – higher than the February 2022 Canadian national unemployment rate of 5.5%.ⁱⁱ
- And, our 2020 survey noted that 84% of community members reported lack of understanding from people about what it means to live with a facial difference, 76% reported intrusive and inappropriate questions from people in public, 74% reported stress and anxiety related to living with a facial difference, 69% reported ongoing mental health concerns, and 24% reported harassment and mistreatment in public due to their facial difference.

In order to ensure the new national dental care plan incorporates the needs of the two million Canadians with facial differences, AboutFace hopes you will consider the following when creating the plan:

- **Ensure the plan incorporates support for people with facial differences who do not identify as disabled.** In our last two facial difference community surveys, in 2020 and 2022, approximately one-third of facial difference community members identified as disabled. The majority of the population do not identify as disabled, and the majority of those who do identify as a person with a disability identify in an intersectional way – *as a person with a disability and with a facial difference*. Individuals identify their disability, such as a hearing or vision impairment, as intersectional with their facial difference, not part of their facial difference. By ensuring that facial difference, and the dental care needs of the community, are identified and addressed separately to disability, you will support the majority of the eligible community through this program.
- **Ensure that people with facial differences are eligible for regular, ongoing general dental care and specialist care.** People with facial differences may have conditions that require frequent visits to the dentist for ongoing care and maintenance, or the need for specialist care. These specialists are outlined in the Office of the Parliamentary Budget Officer's report *Cost Estimates of Federal Dental Care Programs for Uninsured Canadians*.ⁱⁱⁱ Specialist care can be costly, but is required to support the health and well-being of community members. Examples may include:
 - o The need for a replacement tooth implant for a person with cleft lip and/or palate.

- Several appointments to undergo examinations or cleanings for individuals with conditions like Treacher Collins Syndrome (TCS) or Goldenhar Syndrome. Patients with these conditions are often born with smaller jaws and may need extra appointments as they may have trouble keeping their mouth open for extended periods of time or dental practitioners may need more time to access all areas of the mouth safely.
 - Individuals with venous malformations in their face or mouth may need extra care and specialist attention due to the danger of the malformation, treatment, and potential bleeding.
- **If eligibility is dependent on *not* having any private or employer-related dental benefits, recognize that not all dental plans are created equal, especially for the facial difference community.** Not all benefit or private dental plans cover major treatments (e.g. crowns or bridges), implants, orthodontic care, and specialist fees. A public dental plan that recognizes the needs of the facial difference community would be one that acknowledges the gaps in private and employer-related dental benefits and allows people from the facial difference community to avail of the public plan when their private plan falls short. For example:
- Many families of children with cleft lip and/or palate, the most frequently occurring craniofacial condition, do not have private benefits which cover orthodontic treatment and available provincial plans for this condition are often capped or have co-pays which are prohibitive for many families.^{iv} Families across all income brackets contact AboutFace to find other resources to support their child’s orthodontic treatment, which can be costly and can last several years, including into adulthood.
 - People with craniofacial differences who may have had many complex dental treatments in childhood, which would have been eligible under a provincial plan, will often need retreatment in adulthood. These retreatments in adulthood are not covered under provincial plans, except in very rare cases when an exception is sought and approved through a Ministry of Health.
- **Ensure access to dental care is safe and timely for people with facial differences.** The facial difference community is made up of individuals from every province and territory and includes people from many equity-seeking groups. Some individuals may need to travel to receive specialist dental treatment while others come from communities that encounter additional systemic barriers to care, including Indigenous peoples, Black people, members of the 2SLGBTQIA+ community, refugees, etc. Recognizing the unique and intersectional needs of the community through the plan, will help improve:
- Physical health outcomes by allowing people to receive timely care while acknowledging the unique needs of the facial difference community when it comes to oral health.
 - Mental health outcomes as improved dental care and oral health will increase self-esteem and help decrease anxiety.

- Employment opportunities and benefits to psychosocial health through the improvement of physical and mental health.

AboutFace would be pleased to discuss the critical dental needs of the facial difference community, upon your review of this information. Ensuring equitable access to dental care is critical to the health and wellness of the facial difference community in Canada. Please contact our Executive Director, Danielle Griffin at danielle@aboutface.ca or 416-597-2229 x24.

We appreciate your time.

Yours sincerely,

D.Griffin

Danielle Griffin
Executive Director

K. Joachim

Kariym Joachim
Board Chair & President

cc: The Honourable Jean-Yves Duclos, P.C., M.P., Minister of Health
The Honourable Candice Bergen, P.C., M.P.
Mr. Jagmeet Singh, M.P.
Mr. Michael Barrett, M.P.
Mr. Don Davies, M.P.

ⁱ Nick Boisvert, CBC, "Everything we know about the Liberal-NDP dental care proposal" -

<https://www.cbc.ca/news/politics/liberal-ndp-dental-plan-1.6393981>;

Erica Alini, *The Globe and Mail*, "New Liberal-NDP dental plan could benefit millions. But what will it cover and when?" -

<https://www.theglobeandmail.com/investing/personal-finance/household-finances/article-new-dental-plan-could-benefit-millions-but-what-will-it-cover-and-when/>

ⁱⁱ Labour Force Survey, February 2022, Statistics Canada -

<https://www150.statcan.gc.ca/n1/daily-quotidien/220311/dq220311a-eng.htm>

ⁱⁱⁱ *Cost Estimate of a Federal Dental Care Program for Uninsured Canadians*, Office of the Parliamentary Budget Officer, p. 13 -

https://www.pbo-dpb.gc.ca/web/default/files/Documents/Reports/RP-2021-028-M/RP-2021-028-M_en.pdf

^{iv} Constantine Batsos, DDS, *An environmental scan of cleft lip and palate clinics and dental benefit programs in Canada* -

<https://www.caphd.ca/sites/default/files/1008-CleftLipAndPalateScan.pdf>