



Canadian Society for Medical Laboratory Science
Société canadienne de science de laboratoire médical

March 26th, 2020

The Honourable Patty Hajdu
Minister of Health
70 Colombine Driveway
Brooke Claxton Building
Ottawa, ON K1A 0K9

RE: Tackling Canada's Medical Laboratory Challenges During Covid-19

Dear Minister Hajdu,

Since 1937, CSMLS has served as the national certifying body and professional association for medical laboratory technologists and medical laboratory assistants. Representing over 15,000 members in Canada, CSMLS is defined by a long history of leading the medical laboratory profession by setting entry to practice qualification standards and offer certification processes in medical laboratory science, which are recognized by regulatory bodies in each province.

The Canadian Society for Medical Laboratory Science (CSMLS) represents the front-line laboratory professionals across Canada working tirelessly on the Covid-19 pandemic. Even before this health emergency, our members have been responsible for conducting hundreds of millions of tests for patients every year in Canada. The emergency of this pandemic presents additional challenges that require action to address growing needs.

As we have indicated to your office over the previous years, Canada is facing a serious shortage of Medical Laboratory Technologists (MLTs). **About half of all MLTs will be eligible to retire shortly**, which compounds the ongoing shortages already felt in certain regions of the country. We are counting on your government's support for laboratory professionals during the ongoing pandemic and beyond to maintain the capacity of local medical laboratories and address our ongoing concerns related to growing gaps of services.

The backlog of testing from medical laboratories during this pandemic and going forward can delay patient care and hold back the critical decision-making of other medical professionals. During the Covid-19 emergency, we are seeing a heightened demand for laboratory testing needs and the existing shortages is being felt more acutely at the moment.

We are asking to work with your government to adopt steps to prevent shortages in medical laboratories during this and the next healthcare emergency:

Short-term Action:

1. CSMLS, as the association representing Canada's MLT's and MLA's, as well as being the national certifying body, is well placed to offer concrete suggestions on what needs to be done to address capacity concerns now and in the future.

Recent media reports such as the 'deputization of research labs' carry serious concerns and must be assessed versus other more suitable options before making such a decision. Testing for COVID is very manual and requires precise work done by highly trained medical laboratory technologists. It also needs to be conducted in controlled medical laboratory settings. Looking to research labs and using research students to assist with COVID testing should be an emergency measure only considered after several others have been implemented, including: return of retired MLTs, expanded use of MLAs, use of student MLTs, etc.

Recommendation: Work with medical laboratory regulators and CSMLS on what options make the most sense to address new demands on testing.

2. Health Canada has a leading role to play in ensuring the expedited approval of new testing methods and devices are occurring. Further, the bulk purchasing of lab equipment for the country would ensure we are better prepared in all labs across Canada to meet these demands.

Recommendation: Continue to play a lead role in expedited approvals of medical devices. Work with lab stakeholders on bulk purchasing for supplies required across the country.

3. Public health and hospital laboratories are suffering from the lack of purchasing power and financial resources to make critical purchases for laboratory equipment that will increase testing capacity without a material increase in human resource need.

Recommendation: Release new funding immediately to the province's health authorities to purchase new equipment like PCR machines, to scale up testing abilities rapidly.

4. Lab testing demands continue to put pressure on the healthcare system. The Covid-19 pandemic places an added burden and testing demands on the laboratory system. Workflow decisions are made at the institutional level. The government can show leadership in recommending a voluntary reduction in low-value and low-stakes testing during this time so that labs can focus the resources where they are most needed.

Recommendation: Recommend to healthcare professionals to defer or delay unnecessary medical testing that would not impact a patient's overall health.

5. Provincial regulators are currently operating all registration-related functions normally. We support their approach to maintaining the highest standards. At this time, they are not receiving requests to enact measures to increase licenced practitioners in the labour market. That said, now is the time to prepare appropriate emergency measures, such as recalling retired workers, to ensure a supply of qualified laboratory professionals if/when needed.

Recommendation: CSMLS and regulators continue to monitor health human resource requirements of the laboratory sector and prepare protocols to address sudden HHR needs.

Medium-term Action:

1. Laboratory capacity can be increased through greater use of Medical Laboratory Assistants (MLAs). By moving to regulate MLAs under the provincial legislation such as the Regulated Health Professions Act, 1991, in Ontario, provinces could fairly quickly provide a framework that enables labs to safely expand the use of this professional group of over 5,000 practitioners in Ontario alone. This is the case for provinces across Canada. Use of MLAs to full scope will allow for a redistribution of labour within the labs to better support the pandemic response as well as more common testing required to support patient care. It would also provide the public with the necessary assurance that these individuals meet a minimum standard of professional competence and ethics, have requirements for ongoing competence, and are subject to the same public protection mechanisms that apply to all other regulated health professionals.

Recommendation: Urge provinces to amend their regulated health professions legislation to regulate the many thousands of MLAs in Canada to inject a labour boost on labs in the country. It is of vital importance that tests are conducted by qualified laboratory professionals.

2. Canada has a robust system of training programs in the province, which rank as some of the finest educational programs around the world. Unfortunately, these programs are facing ongoing capacity constraints around enrollments. There is an insufficient new crop of graduates to meet future demand and replace those retiring.

Recommendation: Dedicate funding to increase enrollment by a minimum of 10% at Canada's medical laboratory science programs.

3. In the past, Canada has been home to educational bridging programs to offer easy paths to licensure for foreign-trained MLTs. Canada is home to many foreign-trained MLTs that are currently unable to practice. The major barrier to entry is the roughly \$14,000 program cost for the bridging program, including the need for clinical placements. Institutions like the Michener Institute of Education at UHN in Ontario have the curriculum and evaluations for these bridging programs, leading to a short implementation period.

Recommendation: Fund bridging programs to onboard foreign-trained MLTs in Canada to join the lab workforce using the robust existing curriculums and evaluations offered from our educational institutions. A \$20 million investment for this would go towards making a difference now.

Only through government intervention can Canadian medical laboratories maintain the capacity needed to conduct vital tests for COVID-19 and emerging healthcare emergencies in addition to vital ongoing testing and diagnostic needs.

As outlined above, there is no shortage of short and medium-term actions that the government can take to help address bottlenecks and provide further certainty to Canada's medical laboratory system.

I am available to speak further to these points at your convenience. For more information or to discuss with our team further, please contact Christian von Donat at christian@impactcanada.com or 613-408-0498.

Sincerely,



Christine Nielsen, MBA (c), BHA, MLT, CAE
Chief Executive Officer, CSMLS