

Speech-Language & Audiology Canada: Canada Student Loan Act amendment consultation

Consultation Comment Section

General Comment

- While we commend the government's expansion of the Canada Student Loan Forgiveness Program to 10 additional health and social service professions, it remains deeply concerning that speech-language pathologists (S-LPs) and audiologists were excluded. These professionals provide essential rehabilitation and diagnostic services, directly comparable to physiotherapists and psychologists, who were included in the expansion. Excluding S-LPs and audiologists exacerbates existing workforce shortages, particularly in rural and remote areas, where communication health services are already scarce. If left unaddressed, this omission could worsen health disparities, increase long-term healthcare costs, and leave critical gaps in service accessibility.
- The inclusion of speech-language pathologists and audiologists will ensure that there is a full spectrum of health and social service providers available to support better care and access in rural and remote areas. Expanding access to this broader set of professionals would support the federal government's stated commitment to better serve rural communities. Increasing access to preventative care will have major positive impacts on the Canadian economy by reducing trips to the emergency room and reducing the likelihood of further health complications.
- By expanding the lists to include more essential health professions, such as speech-language pathologists and audiologists, more skilled professionals will join rural and remote labour markets and participate in local economies as they establish their in-person services outside of Canada's urban centres, where they and their families may decide to reside for the long term. This also ensures that the next generation of children raised in rural and remote areas will have the financial support they will need to leave and return to serve their home communities as regulated health professionals. This is essential for bridging cultural and linguistic gaps in health care access and for building stronger trust between Canadians and the health care system.
 - According to Statistics Canada, [more than 1.3 million people in Canada have a hearing disability](#). Additionally, hearing loss is a [leading cause of disability](#) among men and women over 60. Audiologists can provide assessments and treatment for those who

are impacted by hearing loss.

- [Over 5% of the world's population](#) – or 430 million people – require rehabilitation to address their disabling hearing loss (including 34 million children). It is estimated that by 2050 over 700 million people – or 1 in every 10 people – will have disabling hearing loss. S-LPs and audiologists help those who are affected by communication disabilities, particularly with regard to hearing loss, issues with swallowing, balance and other communication difficulties.
- In general, youth under the age of 15 years and older adults over 80 years old are most likely to have hearing and speech disorders. [Audiometry results from 2015](#) indicate that 8% of children and youth aged 6 to 19 had hearing loss, as well as 78% of adults aged 60 to 79.
- As cited in a [2023 study conducted through McMaster University](#), the prevalence of communication disorders among youth in the justice system has been estimated to be as high as 60%–90%. The high prevalence of language impairments among youth in the justice system and the consequences of under- and misdiagnosis support the need for speech-language pathologist (S-LP) involvement in youth justice.
- Speech-Language & Audiology Canada is a part of The Extended Healthcare Professionals Coalition (EHPC), a coalition of organizations representing over 100,000 regulated health professionals that make up Canada's health care landscape, including audiologists, chiropractors, dental hygienists, dentists, denturists, dietitians, occupational therapists, optometrists, physiotherapists, psychologists, speech-language pathologists, and social workers. As regulated professions, these practitioners play a vital role as part of every Canadian's health care team and ensure timely access to the treatment needed. Although EHPC was consulted in the expansion to the Student Loan Forgiveness, the Program did not include all of the recommended professions such as dietitians, speech-language pathologists, audiologists, denturists, optometrists, occupational therapists and chiropractors.

Executive Summary

The exclusion of speech-language pathologists (S-LPs) and audiologists from the Canada Student Loan Forgiveness Program is a critical oversight that will exacerbate workforce shortages, increase healthcare costs, and deepen health disparities in rural and remote communities. These professionals provide diagnostic and rehabilitative services comparable to physiotherapists and psychologists, both of whom were included in the program expansion. Without immediate action, under-served communities will face longer wait times, worsening health outcomes, and avoidable healthcare expenditures. SAC urges the government to rectify this oversight by amending Canada Student Financial Assistance Regulations and the Canada Student Loans Regulations to explicitly include speech-language pathologists and audiologists. This will ensure equitable access to essential communication and hearing health services for all Canadians.



Speech-Language &
Audiology Canada
Communicating care

Speech-language pathologists (S-LPs) and audiologists are essential members of the health workforce across Canada but are not currently included in the amendments to the Canada Student Financial Assistance Regulations and the Canada Student Loans Regulations to expand loan forgiveness eligibility for various health and social service professionals. In order to combat this, Speech-Language & Audiology Canada is advocating to expand loan forgiveness eligibility to include these critical professions.

Canada faces a persistent shortage of essential healthcare providers, particularly in rural and remote areas. While the Canada Student Loan Forgiveness Program aims to attract professionals to underserved communities, it currently excludes key specialists like S-LPs and audiologists. These professionals provide vital services for individuals with communication and hearing disorders, yet many Canadians struggle to access them due to workforce shortages.

The expansion already includes physiotherapists and psychologists, recognizing the importance of rehabilitation and mental health services. Similarly, speech-language pathology and audiology are crucial for diagnosing and treating speech, language, swallowing, and hearing disorders. Excluding them creates a gap in access and perpetuates workforce imbalances.

Speech-Language & Audiology Canada urges the federal government to correct this oversight by including S-LPs and audiologists in the Canada Student Loan Forgiveness Program.

Ensuring access to essential speech, language, and hearing services is a matter of health equity, economic sustainability, and community well-being.

Issues

Budget 2024 outlines amendments to the Canada Student Financial Assistance Regulations and the Canada Student Loans Regulations to expand loan forgiveness eligibility to early childhood educators, dentists, dental hygienists, pharmacists, midwives, teachers, social workers, personal support workers, physiotherapists, and psychologists. However, speech-language pathologists and audiologists have been excluded from this expansion despite their essential contributions to health care.

Background

Canada is experiencing a critical and persistent shortage of essential healthcare professionals, particularly in rural and remote communities. While the Canada Student Loan Forgiveness Program was introduced to incentivize family physicians, nurses, and nurse practitioners to work in underserved communities, it does not currently extend to other key health care providers. Speech-language pathologists (S-LPs) and audiologists play a crucial role in the health and well-being of Canadians, yet their services remain inaccessible to many individuals living in these communities.

Many Canadians in rural and remote areas experience difficulty accessing speech-language and hearing services, which significantly impacts their communication, learning, and overall quality of life. By extending loan forgiveness to S-LPs and audiologists, more professionals would be incentivized to work in these

communities, ultimately improving health outcomes for individuals with communication and hearing disorders.

The proposed expansion of loan forgiveness already includes physiotherapists and psychologists, acknowledging the necessity of rehabilitation and mental health services. Similarly, speech-language pathology and audiology are essential for diagnosing and treating speech, language, swallowing, and hearing disorders that affect daily life. Despite the comparable importance of these professions, they have been excluded from the expansion, leaving a crucial gap in access.

Additionally, including S-LPs and audiologists in the program could help mitigate financial barriers and workforce challenges. Becoming an S-LP or audiologist requires extensive education, including a master's degree, resulting in significant student debt. This financial burden discourages professionals from choosing careers in underserved areas, exacerbating the shortage of services in communities. Expanding loan forgiveness to include these professionals would alleviate financial stress and encourage them to provide services where they are most needed. Furthermore, incentivizing only certain health professions while excluding others risk exacerbating both the strain on the health system and gaps in access.

Objective

Expanding the loan forgiveness benefit to include speech-language pathologists and audiologists would contribute to reducing disparities in access to essential health care services across Canada. It would align with the government's broader efforts to address workforce shortages in health and social services while ensuring individuals in rural and remote communities receive the communication and hearing care they need.

Description

- Indicate which borrowing group the occupation falls into.
 - “Borrowers in this group would be eligible for up to \$30,000 in loan forgiveness over a five-year period.”
- Indicate the provinces/territories where the occupation is unregulated or if they are regulated in all provinces/territories.
 - S-LPs and audiologists are unregulated in all three territories. They are regulated in all provinces.
- Provide the definition of the occupation proposed for the Canada Student Financial Assistance Regulations and the Canada Student Loans Regulations.
 - **Speech-language pathologists** are regulated health professionals with at least a master's degree in speech-language pathology. They provide individualized care to support individuals with communication and swallowing difficulties, focusing on prevention, evaluation, and management across the lifespan. S-LPs address a wide range of concerns, including speech sound production, voice, resonance,

fluency (stuttering), language comprehension and expression, literacy, cognitive-communication, augmentative and alternative communication (AAC), and feeding and swallowing. They work in various settings, including health, education, community, and university environments, often serving as key members of health care and education teams. Using a collaborative, person-centered approach, S-LPs help meet the communication and swallowing needs of their patients, clients, and families.

- **Audiologists** are regulated health professionals with a master's or doctorate degree in audiology who provide individualized care for people of all ages with hearing and balance issues. They specialize in the prevention, assessment, diagnosis, and management of hearing and balance disorders. Audiology services address a range of concerns, including hearing loss, central auditory processing, tinnitus, sound tolerance disorders, and vestibular (balance) issues, while also offering guidance on hearing loss prevention. Audiologists work in various settings, including health, education, community, and university environments, to support individuals in maintaining optimal auditory and balanced health.

Regulatory Development

- Indicate the instances in which feedback to include the occupation was submitted to the federal government on the topic of expanding the student loan forgiveness program.
 - Speech-Language & Audiology Canada has participated in meetings with political staffers and provided a number of submissions to the Government of Canada regarding expanding the student loan forgiveness program to include speech-language pathologists and audiologists. Listed below are the instances in which SAC has provided feedback:
 - 2019 Pre-budget Submission;
 - April 2022 meeting with political staff in Employment and Social Development Canada regarding Student Loan forgiveness;
 - October 2022 Pre-budget Submission;
 - October 2022 written consultation submitted;
 - August 2023 Pre-budget Submission;
 - July 2024 (with the Extended Healthcare Professionals Coalition);
 - August 2024 Pre-budget Submission; and
 - March 2025 Pre-budget Submission.
- Indicate the representation of Indigenous peoples within the occupation. This information is to supplement the reasoning that by expanding the regulations to include the occupation it would in turn support Indigenous learners.

As of June 2024, Speech-Language & Audiology Canada has 0.007% (46 members of roughly 7,000) who identify as Indigenous. To note, SAC's membership only accounts for approximately

41% of speech-language pathologists as members and 28% audiologists as members in Canada.

Regulatory Analysis

Benefits and costs

Describe the economic benefit of expanding these regulations to include the occupation (i.e. cost-benefit analysis).

- Including speech-language pathologists and audiologists in student loan regulations would provide economic benefits by improving health outcomes, reducing long-term health care costs, and supporting caregivers.

Speech-Language Pathologists

- As essential members of health care teams, S-LPs specialize in speech, voice, resonance, language, cognitive-communication, and swallowing disorders, offering evidence-based interventions that enhance functional outcomes and prevent further health and social complications.
- They play a crucial role in working with seniors affected by cognitive impairments, stroke, dementia, Alzheimer's disease, and Parkinson's disease, conducting screenings and assessments that aid in early detection and accurate diagnosis.
- S-LPs are critical in ensuring early detection and treatment of communication issues including speech and language acquisition in children to prevent worsening conditions, educational delays, and long-term health care costs.
- Additionally, S-LPs help assess depression in individuals with communication disorders, such as those with post-stroke aphasia. Their support extends to caregivers, reducing caregiver burden and improving communication satisfaction, preparedness, and the effective use of communication strategies.
- By integrating S-LPs into expanded regulations, health care systems can enhance patient care while mitigating costs associated with delayed diagnoses, hospital readmissions, and long-term institutional care.

Audiologists

- As critical members of a senior's health care team, audiologists play a key role in rehabilitative care for older adults living with or at risk of frailty. They identify, diagnose, and manage hearing loss, tinnitus, vestibular and balance disorders, and other communication impairments, which are among the most prevalent disabilities that can be addressed through rehabilitation.
- By screening for sensory and communication impairments using standardized assessments, audiologists can implement early interventions such as hearing aids, preventing worsening

hearing loss that could lead to social isolation and cognitive decline.

- Research highlights the benefits of managing hearing loss, including improved quality of life, reduced behavioral issues in individuals with dementia, and cost savings for health care systems, as hearing loss is a potentially modifiable risk factor for dementia. Additionally, [studies show that treating hearing loss increases Quality-Adjusted Life Years \(QALY\)](#), demonstrating both economic and health advantages. Including audiologists in expanded regulations would help ensure timely interventions, keeping older adults independent longer and ultimately reducing the financial strain on health care and long-term care systems.

Indicate the number of federal student loan borrowers that would benefit from this regulation if it were expanded to include the occupation.

- According to the latest data provided by the Canadian Institute for Health Information (CIHI), which does not include British Columbia and provides inaccurate data for Alberta, there are 111 audiologists and 936 speech-language pathologists currently enrolled in programs across the country. Although we do not know how many students take on student loans to pay for their education, there is likely a percentage of these students that could benefit from this regulation.

In addition to better access to health and social services, describe the benefits to the community of expanding the student loan forgiveness program to include the occupation.

- Expanding the Student Loan Forgiveness Program to include speech-language pathologists and audiologists would provide significant benefits to communities beyond improved access to health and social services. By ensuring more professionals are available in underserved areas, seniors would receive essential communication and hearing support that enables them to age in place, maintain independence, and stay connected with their families and communities. Communication is vital for older adults to engage in daily activities, access health care, and maintain social connections, reducing the risk of isolation, depression, and cognitive decline.
- Within our pre-budget consultation for March 2025, SAC outlined how integrating S-LPs and audiologists into primary care teams across Canada would strengthen community-based health care, supporting seniors in their homes and reducing reliance on hospitals and long-term care facilities. These professionals play a crucial role in assessing and managing conditions such as speech, language, and swallowing disorders, as well as hearing loss and balance issues, all of which can impact a senior's ability to live safely and independently. With the federal government providing resources and guidance to provinces and territories, expanding the program would help establish a more comprehensive, coordinated approach to senior care.
- Additionally, increasing the number of S-LPs and audiologists in rural and underserved areas would create job opportunities, strengthen local health care systems, and enhance overall community well-being. By addressing communication and hearing challenges early, individuals can remain active participants in their communities, improving their quality of life while

reducing the burden on caregivers and health care providers.

- Having robust, built-in mentorship programs and communities of practice to support rural/remote clinicians are likely to improve retention and reduce burnout. Having additional supports extend to supervise clinical placements in rural/remote areas would also be helpful. These initiatives would require appropriate investments in reliable internet service and related equipment for virtual supports. The government could support the addition of funding to support clinical placements in rural areas through universities. Support could be provided in the form of subsidies to increase honorariums for clinical placement supervisors, lodging or housing support for students, etc. By acquiring clinical experience in rural settings, you can strengthen your connections to the community and your workplace setting.

Demonstrate that the benefit of expanding the programs to include the occupation outweighs the cost.

- Expanding the programs to include this occupation provides significant benefits that outweigh the costs. When practitioners are local, the quality and accessibility of services improve. They can build stronger, more trusting relationships within the community, leading to better engagement and outcomes through robust, built-in mentorship programs and communities of practice which will support rural/remote clinicians are likely to improve retention and reduce burnout. Additionally, reducing the need for travel lowers expenses, alleviating a major financial burden on clinicians who otherwise must fly or drive long distances to provide care. Remote practitioners often rely on group therapy due to resource constraints, which may be less effective for certain needs. By investing in local practitioners, the program ensures more consistent, individualized, and effective care, ultimately leading to better long-term outcomes.

Describe the increased need for services provided by the occupation in rural and remote communities, and how directly expanding the Program to include the occupation would directly solve for that need.

- Increasing the number of S-LPs and audiologists in rural and underserved areas would create job opportunities, strengthen local health care systems, and enhance overall community well-being. According to the Alzheimer's Society of Canada, in 2020, 8.4% of Canadians over 65 had some form of dementia. By 2050, when all the surviving baby boomer generation is 85 or older, the percentage of Canadians over 65 living with dementia is expected to increase to 13.2%. S-LPs and audiologists are key to helping combat the increasing complicated health issues caused by dementia, as well as other conditions affecting aging populations. Additionally, hearing loss prevalence was estimated to be 7.7% for Canadian youth as of 2014, and has likely increased since then. Ensuring S-LPs and audiologists have a presence in rural and remote areas will help to address communication and hearing challenges early and allow individuals to remain active participants in their communities, improving their quality of life while reducing the burden on caregivers and health care providers.
 - Indigenous people are more likely to live in rural and remote areas compared to non-

Indigenous people. What are some conditions your profession can address in improving access to care in conditions that Indigenous peoples are more likely to experience?

- Our professions play a critical role in improving access to care by providing specialized language supports that promote culturally sensitive therapy, respecting linguistic and dialectical differences. Additionally, expanding the presence of our professionals in Indigenous communities can help reduce barriers to language revitalization efforts, ensuring that Indigenous languages and communication traditions are preserved and supported. By addressing these needs, we can enhance educational outcomes and overall well-being for Indigenous individuals in rural and remote areas.

Regulatory cooperation and alignment

Indicate if provinces/territories include the occupation in their jurisdictional loan forgiveness program.

- Multiple jurisdictions include S-LPs and audiologists in their respective loan forgiveness programs, including Alberta, British Columbia, Saskatchewan, Manitoba, Ontario, and Prince Edward Island. Listed below are the details of each that pertain to S-LPs and audiologists.
- Alberta
 - AHS & NADB Joint Bursary Partner Program:
<https://www.albertahealthservices.ca/careers/Page11999.aspx>
 - This bursary partnership program will match between \$1,000 and \$3,500 per eligible student – to a total of \$7,000 per year.
 - Successful applicants must sign separate Return of Service Agreements from both AHS and the NADB.
 - To satisfy the terms of both Agreements, students are required to obtain a
 - position at an AHS facility within the NADB's geographic area.
 - A portion of the funding is designated to support Indigenous individuals (First Nations, Inuit, or Métis); you must be able to provide proof of status upon acceptance of the award.
- British Columbia
 - If you qualify for the B.C. Loan Forgiveness Program, the Province of British Columbia will forgive the outstanding B.C. portion of your Canada-B.C. integrated student loan debt at a rate of up to a maximum of 20% per year for up to five years.
 - If you complete five years of employment, all or a percentage of your B.C. student loan debt will be forgiven.
 - Audiologists and S-LPs qualify: <https://studentaidbc.ca/repay/repayment-help/bc-loan-forgiveness-program?form=MG0AV3>
- Saskatchewan
 - Graduate Retention Program

- This program provides up to \$24,000 in tax rebates for tuition costs, but only up to an undergraduate level. Graduate and PhD programs are not eligible.
- Manitoba
 - The previous government announced a rural health action plan in 2022, but the website for that plan is now defunct with no substantial news since the change in government in 2023.
- Ontario
 - Rehabilitation Professionals Incentive Grant Program
 - This is a regional incentive program, which serves a similar purpose to the CSLFP, and is open to anyone who seeks to work in those rural regions rather than being a student loan relief tool.
- Prince Edward Island
 - Allied Health Incentive Program:
 - <https://www.princeedwardisland.ca/en/information/health-and-wellness/allied-health-incentive-program?form=MG0AV3>
 - S-LPs are eligible, but audiologists are not
 - A one-time financial incentive of \$10,000 is available for eligible Allied Health Professionals.
 - 1,950 working hours return-in-service agreement that must be signed by the applicant and the employer prior to the commencement of work.

Gender-based analysis plus

Indicate the % of women working in the occupation who would be eligible for the Program.

- A significant percentage of professionals in this field are women, many of whom could benefit from the Student Loan Forgiveness Program. According to CIHI data from 2021, 96% of speech-language pathologists and 86% of audiologists are female. Given this high representation of women in these occupations, expanding eligibility for loan forgiveness could provide meaningful financial relief and support workforce retention in these essential health care roles.

Describe how including the occupation in the Program would help address the health disparities that exist between the urban and rural populations.

- Including speech-language pathologists and audiologists in the Student Loan Forgiveness Program would help bridge the gap in health care access between urban and rural populations. Rural and remote communities often face a shortage of these professionals, leading to long wait times, limited services, and increased reliance on telehealth solutions or inconsistent professionals, which may not always meet the needs of individuals requiring in-person care. By offering loan forgiveness, more S-LPs and audiologists would be incentivized to work in underserved areas, improving access to essential communication, hearing, and swallowing services. This would enhance early diagnosis, intervention, and ongoing support, ultimately reducing health disparities and improving long-term outcomes for rural populations.



Canada Student Loans Act

Indicate that the Canada Student Loans Act should be amended to include the occupation.

- Speech-language pathologists are regulated health professionals with at least a master's degree in speech-language pathology. They provide individualized care to support individuals with communication and swallowing difficulties, focusing on prevention, evaluation, and management across the lifespan. S-LPs address a wide range of concerns, including speech sound production, voice, resonance, fluency (stuttering), language comprehension and expression, literacy, cognitive-communication, augmentative and alternative communication (AAC), and feeding and swallowing. They work in various settings, including health, education, community, and university environments, often serving as key members of health care and education teams. Using a collaborative, person-centered approach, S-LPs help meet the communication and swallowing needs of their patients, clients, and families.
- Audiologists are regulated health professionals with a master's or doctorate degree in audiology who provide individualized care for people of all ages with hearing and balance issues. They specialize in the prevention, assessment, diagnosis, and management of hearing and balance disorders. Audiology services address a range of concerns, including hearing loss, central auditory processing, tinnitus, sound tolerance disorders, and vestibular (balance) issues, while also offering guidance on hearing loss prevention. Audiologists work in various settings, including health, education, community, and university environments, to support individuals in maintaining optimal auditory and balanced health.