

November 26, 2025

Ms. Deborah Richardson
Deputy Minister of Health
College Park, 5th Floor
777 Bay Street
Toronto, ON M7A 2J3

Re: Physician Signature Requirement – Communication Aids Category

Dear Ms. Richardson,

Speech-Language & Audiology Canada (SAC) is the national association representing 7,000 speech-language pathologists (S-LPs), audiologists, and communication assistants across Canada. In Ontario, SAC represents approximately 2,100 S-LPs, many of whom provide Augmentative and Alternative Communication (ACC) assessment and support. We share the concerns outlined in the attached letter sent in early November by Jennifer Churchill, President and CEO of Empowered Kids Ontario (EKO), and endorsed by the CEOs of children's treatment centres and hospitals operating AAC clinics.

SAC strongly supports the position presented in that letter and agrees that the continued requirement for a physician (MD) or nurse practitioner (NP) signature on ADP applications for communication aids delays access to care, increases costs, and creates unnecessary administrative burdens for families, clinicians, and the healthcare system.

Clinical Impact on Families

- Families without a primary care provider often face extreme delays or are unable to secure a signature at all.
- Families with a provider are frequently charged fees to obtain signatures, creating inequitable financial barriers.
- S-LPs are uniquely trained to assess and recommend AAC aids and devices as part of a comprehensive, interprofessional care pathway that primary care providers are not typically involved in.

System Inefficiencies

- The physician signature requirement consumes valuable time from both S-LPs, who must coordinate and follow up on forms, and from MDs/NPs, whose time could be better spent on direct patient care.
- Incorrect or incomplete MD/NP form completion often results in the need for resubmission leading to delays, additional costs and clinic visits for many families.

- The physician signature requirement impedes Ontario's ongoing efforts to reduce administrative burden and improve system efficiency across healthcare professions.

S-LP's Professional Scope

- S-LPs are regulated health professionals that are concerned with the identification, assessment, treatment and (re)habilitation and prevention of communication and/or swallowing disorders in children and adults. S-LPs clinical scope of practice includes the provision of assessment, treatment and consultation services for AAC needs.

Precedent and Consistency

- Other ADP categories, such as seating and mobility aids, operate efficiently with a single professional authorization.
- As recently as 2024, ADP recognized the professional scope of audiologists and indicated that the physician's signature requirement in the Hearing Aids category should be removed.
- No conflicting interests have been identified to prevent the same acknowledgement for S-LPs.

Our Request

We urge the Assistive Devices Program to remove the physician signature requirement for the Communication Aids category and to recognize the clinical training, experience and judgment of S-LPs as sufficient for recommending AAC devices.

This change would:

- Improve timely access to AAC devices for clients and families.
- Reduce costs and administrative burden on families.
- Alleviate unnecessary demands on MDs/NPs.
- Align ADP policy across categories.

We welcome the opportunity to meet with you to discuss this recommendation further. In addition, we respectfully request that SAC be included in any upcoming consultations related to AAC or any broader review of the ADP program that may impact the communication aids category. We can be reached at advocacy@sac-oac.ca for any follow-up.

Sincerely,



Luciana Nechita, CEO

cc: Emily Szeto, Senior Manager, Assistive Devices Programs
Attachment: EKO Letter