Submission of TECHNATION Canada to the Standing Senate Committee on Social Affairs, Science and Technology (SOCI) on the study of Bill S-5 – *Connected Care for Canadians Act*

Summary

TECHNATION is a non-profit member-based IT industry association representing Canada's technology sector, including both homegrown innovators and global multinationals that contribute significantly to the country's dynamic tech ecosystem. The association includes organizations that design, develop, and deploy digital health solutions across healthcare and public services - including vendors, solution providers, and digital health innovators who play a key role in advancing the modernization of Canada's health system.

Bill S-5 is a critical step toward enabling a more connected, efficient, and patient-centred health system across Canada. It is equally an important step toward modernizing Canada's health care systems and fulfilling the objectives of the *Pan-Canadian Health Data Charter.* TECHNATION supports this bill and its objective of promoting a secure, person-centred health system.

The successful implementation of S-5, much of which TECHNATION understands would be addressed through forthcoming regulations, will depend on clear and well-defined standards, predictable timelines, strong federal–provincial coordination, robust privacy safeguards, and, in time, supported by investment to ensure its policy objectives are effectively realized in practice.

Context

Health systems across the country continue to face significant challenges related to fragmented digital infrastructure and inconsistent data exchange between health organizations, regions, and technologies.

This fragmentation has real-world consequences, including:

- Delays in access to clinical information
- Duplicative testing and services
- Medication errors and gaps in care continuity

- Increased administrative burden for clinicians
- Inefficiencies that increase system costs

Bill S-5 addresses a foundational policy gap by establishing federal direction to improve interoperability and reduce barriers to health data exchange, including addressing data blocking practices that limit timely access to patient information.

This legislation is important because interoperability is not a secondary feature of digital health systems - it is the enabling infrastructure for virtually all modernization efforts, including:

- Virtual care expansion
- Artificial intelligence and advanced analytics
- Primary care transformation
- Integrated care delivery models
- Health system planning and evaluation

Without consistent national direction, Canada risks continued fragmentation that limits innovation, weakens system efficiency, and constrains improvements in patient outcomes.

Interoperability Standards as Foundational Infrastructure

Common interoperability standards are essential to enabling reliable, secure, and scalable health data exchange. Fragmentation in standards leads directly to inconsistent implementation, limiting the ability of systems to communicate effectively across jurisdictions and vendors.

Standardization is also a prerequisite for ensuring that digital health investments deliver their full value across the system.

Patient Safety and Health Outcomes

Fragmented systems create patient safety risks, including incomplete clinical histories, duplicative testing, and avoidable delays in care.

Improved interoperability supports:

- Safer clinical decision-making through complete and timely access to patient records
- Better coordination across care settings
- Reduced duplication of diagnostics and therapies

- Improved continuity of care across providers and jurisdictions

Better data flow ultimately translates into improved health outcomes for Canadians across jurisdictions, safer care delivery – while minimizing burden for health care practitioners.

Impact of Data Blocking

TECHNATION strongly supports provisions that discourage data blocking practices, which limit timely access to health information, negatively impacts patient care, and reinforces system inefficiencies.

Reducing data blocking:

- Improves patient safety
- Reduces administrative burden on clinicians and health organizations
- Enables fair competition based on outcomes and innovation rather than system lock-in
- Supports a healthier and more competitive Canadian health technology ecosystem

A more open interoperability environment allows solutions providers to compete on value and performance rather than proprietary constraints. This not only encourages innovation in the ecosystem, it facilitates equipping health care practitioners with best-in-class solutions, leading to better outcomes in patient care.

Artificial Intelligence, Data Quality, and Standards

The effectiveness and safety of artificial intelligence in healthcare depends on high-quality, standardized, and interoperable data.

Without consistent data standards:

- AI outputs may be biased, incomplete, or inaccurate
- Clinical risk may increase due to unreliable inputs
- Trust in AI-enabled systems may be undermined

Standards-enabled interoperability is therefore not only a technical requirement but a safety imperative for emerging technologies in healthcare in Canada.

Privacy, Security, and Trust

Stronger interoperability, when implemented correctly, can enhance privacy and security by reducing reliance on insecure workarounds such as faxing, manual transfers, and fragmented local systems.

Key considerations include:

- Clear accountability frameworks for data stewardship
- Strong cybersecurity and breach response requirements
- Consistent safeguards across jurisdictions
- Protection of sensitive Canadian health data within appropriate national frameworks

Privacy protection must remain central to implementation to maintain public trust in digital health systems. TECHNATION believes that greater clarity on how safeguards will be defined and implemented would further strengthen the legislative framework.

Implementation Timelines and Practical Feasibility

Implementation timelines must be predictable and coordinated across the health ecosystem.

Key considerations include:

- The need for phased implementation with pilots and testing
- Avoiding artificial or overly aggressive timelines that risk system instability
- Recognition that vendors require time to implement and validate standards safely
- The importance of synchronized adoption across interconnected vendors and systems

Misalignment in standards across provinces and the federal government—even when directionally similar—can create conflicting requirements that increase complexity.

Harmonization and System Coherence

Consistent national direction to reduce fragmentation across provinces and territories is critical.

Without alignment:

- Vendors face duplicative and sometimes conflicting requirements
- Systems become more complex and costly to integrate
- Data exchange remains inconsistent across jurisdictions

Greater harmonization would support a more coherent and efficient national digital health ecosystem.

Innovation and Vendor Ecosystem Development

Bill S-5 presents an opportunity to strengthen Canada's Digital Health ecosystem by enabling a more open and interoperable environment.

Interoperability standards:

- Encourage collaboration rather than siloed development
- Support a stronger Canadian vendor ecosystem
- Enable innovation focused on integration and outcomes
- Foster a more competitive and sustainable health tech market

Recommendations

TECHNATION recommends the committee consider the following throughout the study of this bill.

That the bill, and subsequent regulations thereafter must, facilitate successful implementation by:

- Establishing clear, consistent internationally and nationally accepted interoperability standards aligned across all jurisdictions (Provincial, Territories, Regions, etc.). This will involve clearly defining *interoperability* within the scope of the bill
- Ensuring phased implementation with pilots and sufficient testing periods
- Introducing enforcement mechanisms that clearly discourage data blocking efforts within the bill
- Clearly outlining strong, consistent privacy safeguards within the bill
- Strengthening national coordination through harmonization to avoid fragmented or conflicting requirements
- Aligning this bill with addressing the digital divide in rural and Indigenous communities, to ensure equitable access to streamlined, connected care
- Considering the need for financial support to accelerate rural broadband expansion, offset the standards implementation costs for health care providers and solutions providers – while avoiding passing any costs onto patients. For instance, pursuant to Australia's *Sharing by Default Act 2025*, funding supports the "Sparked" accelerator program, which successfully brings together vendors and health care providers to implement national FHIR standards.

Concluding Statement

TECHNATION supports Bill S-5 as a critical step toward addressing long-standing barriers to interoperability in Canada's health system.

Improved interoperability is essential to enhancing patient safety, enabling innovation, reducing administrative burden, and strengthening the efficiency of Canada's healthcare system.

We welcome the opportunity to continue working with government and stakeholders to support the passage and effective implementation of this legislation, ensuring it delivers meaningful improvements for patients, providers, and the broader health ecosystem across Canada.

Importantly, the long-term success of this and future digital health policy will depend on collaboration between government, health care stakeholders and industry. In the case of Bill S-5, this is especially true during subsequent regulatory phases. This collaborative approach will help ensure that regulation remains practical, implementable, and aligned with real-world system requirements and innovation cycles.