

February 11, 2020

The Honourable Rod Phillips, M.P.P.  
Minister of Finance  
c/o Budget Secretariat  
Frost Building North, 3rd floor  
95 Grosvenor Street  
Toronto ON M7A 1Z1

Dear Minister,

The Coalition of Health Professional Associations in Ontario Automobile Insurance Services (the “Coalition”) is pleased to provide a submission to the Minister regarding the 2020-2021 budget. The Coalition represents over 40,000 regulated, front line health professionals involved in the assessment and treatment of Ontarians<sup>1</sup>.

We understand the challenges faced by injured persons in car accidents and advocate for timely access to assessment and care for claimants. Ontario drivers pay some of the highest rates in Canada, yet many seriously injured accident victims do not receive the care they so desperately need.

Our recommendations focus on enhancing safety, health and everyday affordability for Ontarians:

1. Continue to create tougher laws for those caught driving distracted. The resulting collisions and the cost of vehicle repairs are a major cost to the auto insurance system.
2. Bring subject matter experts together to improve efficiency and reduce fraud in the areas of physical damage, storage and towing.
3. Improve initial intake of new accidents through a simplified electronic accident benefits package that can offer a smoother process, improve the consumer experience and lead to fewer disputes, as well as lessen overall administrative costs to insurance companies.
4. Ensure necessary access to health care in the early stages. The Minor Injury Guideline for simple soft tissue injuries allows the consumer immediate access to treatment funding without insurer interference. This has reduced costs to the system while speeding access to needed care. Similarly, accident victims more seriously injured (e.g. Fractures, brain injury) would benefit from and should have the same access to immediate funding without encumbrance. Regulations, guidelines, and adjusting practices should be revised to support this. This would lead to fewer disputes and reduce the number of claimant-involved insurer-initiated assessments.

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<sup>1</sup> The Coalition members are: the Ontario Associations of Speech Language Pathologists and Audiologists; the Ontario Association of Social Workers; the Ontario Chiropractic Association; the Ontario Dental Association; the Ontario Physiotherapy Association; the Ontario Psychological Association; the Ontario Society of Occupational Therapists; and the Registered Massage Therapists’ Association of Ontario.

# Coalition

Coalition of Health Professional Associations in Ontario Automobile Insurance Services

5. Policy makers must understand that while a majority of patients get better with timely short-term intervention, some patients develop more long term, chronic problems that require better access to optimal health care.
6. Those suffering serious or catastrophic injuries need adequate funding for care. We support the government's recommendation to increase available funding for Catastrophic conditions to \$2 million and recommend similar increases for those severely injured.
7. In cases where dispute resolution is needed we recommend that third party assessments include health care providers with the necessary training, education and experience. We support a peer-to-peer review model where all assessors are held to specific standards and have the needed knowledge and experience in the field of interventions they are evaluating.
8. Regular consumers may not understand any offer of Optional Benefits. The risk is that they may choose lower insurance premiums but then have insufficient coverage in the case of a serious accident.

We thank the Minister for this opportunity and look forward to continued engagement and collaboration.

Sincerely,

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