



The Honourable Peter Bethlenfalvy
Minister of Finance
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April 10, 2024

Dear Minister Bethlenfalvy:

As the Chair of the Coalition of Health Professions in Auto Insurance (the "Coalition"), I am writing to provide support for the Ontario Association of Social Workers' (OASW) request to include social workers in the definition of "health practitioner" in section 3(1) of O.Reg 34/10: Statutory Accident Benefits Schedule (SABS) under the *Insurance Act, 1990*.

The Coalition was formed in 1990 and represents eight regulated health professional associations¹, which, in turn, represent over 40,000 regulated, front line health professionals involved in the assessment and treatment of Ontarians injured in motor vehicle accidents.

The Coalition shares OASW's concern that the inability of social workers to certify their own OCF-18 forms creates barriers to client care and is therefore a public protection concern. Moreover, requiring another health practitioner to certify a social worker's OCF-18 form can imply that the certifying party is qualified to evaluate the reasonability and necessity of treatment without having met the client, or without having any distinct training in the proposed assessment and treatment by the registered social worker.

Since making clinical determinations on the assessment and treatment of individual claimants who are experiencing psychosocial and/or mental health concerns following an MVA falls within the social work scope of practice, there is no added liability for social workers to certify their own OCF-18 forms.

¹ The Coalition is comprised of the following eight member associations, the Ontario Association of Social Workers (OASW); the Speech-Language Pathology & Audiology Ontario ; the Ontario Chiropractic Association (OCA); the Ontario Dental Association (ODA); the Ontario Physiotherapy Association (OPA); the Ontario Psychological Association (OPA); the Ontario Society of Occupational Therapists (OSOT); and the Registered Massage Therapist's Association of Ontario (RMTAO).

Reducing barriers to mental health care for Ontarians who have been in MVAs is essential. I hope that the context I have provided assists you in considering the OASW's request to include social workers as health practitioners as defined in the SABS as we understand that this change in legislation will allow social workers to certify their own OCF-18 forms.

Sincerely,

Dr. Moez Rajwani

Chair, Coalition of Health Professions in Auto Insurance