



March 04, 2024

Ms. Victoria Cheung
Special Advisor and Technical Expert
Financial Services Regulatory Authority (FSRA)
5160 Yonge Street, 16th Floor
Toronto, ON M2N 6L9

Dear Ms. Cheung:

I am writing on behalf of the Coalition of Health Professions in Auto Insurance (the “Coalition”) to express our appreciation for the opportunity to preview and provide feedback on the semi-final *OCF-1: Application for Accident Benefits* form.

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 (MVAs).

While the organization and design of the revised *OCF-1* form is easier to understand and navigate, we believe that to substantively improve ease of completion – and protect claimant privacy -- the form should only require information that is available to claimants and necessary for insurers to open a claim.

Outlined below are the Coalition’s specific recommendations for further simplifying and improving the *OCF-1* form.

1. The Coalition recommends that all questions and/or sections that are not required to open a claim should be removed from the (semi-final) *OCF-1* form including:

- On **Page 2, Section 3 – Accident Details**: The question “*Were you Charged?*” should be removed.
- On **Page 2, Part 4 – Applicant Status** should be removed. Information regarding employment status at the time of the accident is only relevant if/when a claimant applies for income replacement benefits.
- On **Page 2, Part 5 – Other Insurance** should be removed.
- On **Page 3, Part 6 – Authorization for Insurance to Directly Pay Service Provider** should be removed. At the point of opening a claim, most motor vehicle accident victims

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).

will be unfamiliar with an *OCF-23* (which only pertains to those claimants with a minor injury) and may not yet have been seen by a licenced health service provider. Furthermore, this question is redundant as health service providers registered with Health Claims for Auto Insurance (HCAI) are already authorized to receive direct payment from insurers.

2. The Coalition recommends the following additional response options be listed in the *OCF-1* form:

- a. On **Page 1, Part 2 – Policy Details**: An option for claimants to indicate if they do **not** know the response to the question “Are other automobile policies involved?” (e.g., “Don’t Know”).
- b. On **Page 2, Part 3 – Accident Details**: An option for claimants to indicate if they “*Consulted other health care provider*” in response to the question “*Select all that apply*”. It is important to note that options such as attending a collision centre or visiting a hospital are often not relevant to less severe accidents that involve only one vehicle.
- c. If (contrary to our previous recommendation) on **Page 2, Part 4 – Applicant Status** is retained, we recommend that the question “*Select Yes or No for all that Apply*” include an option for claimants to indicate if they returned to pre-accident activities, work and/or school with limited capacity.

The Coalition appreciates the opportunity to provide feedback on the revised *OCF-1*, and we would welcome the opportunity to meet with you to discuss the above-stated recommendations in more detail.

Sincerely yours,

Dr. Moez Rajwani, Co-Chair, Auto Coalition