



December 17, 2021

Ms. Ann MacKenzie
Senior Manager Policy Interpretation
Financial Services Regulatory Authority

Via email

Dear Ms. MacKenzie,

On behalf of the Coalition of Health Professions in Auto Insurance, we are writing to express our support for FSRA's new Product Technical Advisory Committee (P-TAC), but would recommend that the Terms of Reference (TOR):

- 1) Stipulate a co-chair model with one health service provider (HSP) and one insurance stakeholder to serve on a rotating basis.
- 2) Stipulate that FSRA will provide resources to support the work of the P-TAC. For example, administrative support for activities such as canvassing members for meeting dates, preparing Minutes, coordinating feedback on documents, etc.
- 3) Clarify the types of data and evidence that will inform P-TAC recommendations about impacts on consumers and regulatory resourcing implications. To date, data provided by tools such as the Health Service Providers (HSP) Associations' Survey, shared with FSRA last spring, has not been considered actionable evidence. Further, HCAI does not generally collect, nor its reports extract, such data.
- 4) Incorporate a chart/document delineating FSRA's scope and responsibilities with respect to health service providers (e.g., HSP fees, HCAI, etc). Clarifying such information at the outset will be key to the P-TAC's capacity to focus its discussions effectively.

Sincerely yours,

Dr. Moez Rajwani and Ms. Dorianne Sauv , Coalition Co-Chairs