

Letter to the Editor | Affirming the integrity of health care providers

Coalition of Health Professions in Auto Insurance urges open dialogue between insurers and health care providers

By Coalition of Health Professions in Auto Insurance | January 8, 2026 | Last updated on January 12, 2026

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To the Editor,

As a Coalition of eight regulated health professional associations representing more than 40,000 regulated, front line health professionals involved in the assessment and treatment of Ontarians, we would like to highlight concerns regarding issues presented in your January 2025 article, “Why FSRA’s sharpening focus on accident benefits billing.”

In our view, the information presented in your article does not align with the publicly available data in the Financial Services Regulatory Authority of Ontario (FSRA)’s [2022-2024 Health Provider Supervision Plan \(https://www.fsrao.ca/industry/health-service-providers/publications/2022-2024-health-service-provider-supervision-plan\)](https://www.fsrao.ca/industry/health-service-providers/publications/2022-2024-health-service-provider-supervision-plan). Consequently, we are concerned about the potential, but unintended, impact this could have on stakeholder and consumer trust of health care providers in the sector.

The cited FSRA report does not reveal fraudulent events as per FSRA’s own interpretation of “deceptive acts or omissions intentionally committed by a person(s) to obtain advantage, financial gain, or benefits from an insurer beyond that to which one is entitled to.”

The administrative compliance issues identified in FSRA’s report did not include fraudulent, egregious billing practices. Rather, they reflect systemic issues on how to execute administrative policies efficiently and effectively, highlighting a need for improved communication, support, and dissemination of information.

As the FSRA report states:

“The outcomes of both the IE [independent medical examiner] desk reviews and IE on-site reviews confirmed a lack of understanding of regulatory requirements and indicate a need for better sector awareness and education. Given that the non-complaint findings identified during these reviews were due to poor understanding of compliance obligations, and were otherwise not egregious in nature, FSRA elected to issue warning letters rather than escalate for enforcement action.”

FSRA’s supervision initiative highlights two issues.

First, there are evident knowledge translation gaps as educational tools have reportedly had poor uptake.

Second, the non-compliance identified may reflect the substantial administrative burden many of these forms place on HSPs, who are not remunerated for completing them.

The Coalition’s member associations have received ongoing feedback from health professionals that these forms are too administratively burdensome and take up time they should otherwise use for consumer-facing service delivery.

We are concerned that by inadvertently omitting this relevant data and contextual information from FSRA’s report, CU may lead its readers to draw false inferences that fraudulent billing practices are an issue. This would erode trust in the health professionals working in Ontario’s Motor Vehicle Accident Benefits Sector.

It is essential to emphasize the vast majority of health service providers [HSPs] in the automobile accident benefits sector are working diligently to provide high-quality care to accident victims within the bounds of regulatory requirements.

To ensure the continued high standard of care, it is crucial for FSRA to invest in enhanced education surrounding policies, procedures, and expectations for HSPs. This education should be aimed at clarifying the complexities of the system and ensuring HSPs have the resources to comply with these often-burdensome administrative requirements.

Regulated health professions (RHPs) are registered with their own respective health regulatory colleges (HRCs) whose main purpose is to protect the public.

HRCs are responsible for ensuring their members provide health services in a safe, professional, and ethical manner. This includes setting standards of practice, investigating complaints about members, and taking disciplinary action where appropriate.

v. The Coalition agrees FSRA should maintain oversight for high standards of business conduct

and consumers' rights, it is important not to conflate the role FSRA plays within the motor vehicle accident benefits sector with that of the HRCs, which are responsible for the professional practice and licensure of their respective members.

Issues of concern regarding a healthcare provider's business and/or clinical practices should be filed with a practitioner's respective regulatory college.

We respectfully request that Canadian Underwriter (CU) encourage readers to consult FSRA's original supervisory plan for the specific data and details.

The Coalition welcomes the opportunity to collaborate with CU and FSRA and remains committed to open dialogue with stakeholders to ensure accurate public understanding, support for high-quality care, and integrity within Ontario's auto insurance system.

Sincerely,

Coalition of Health Professions in Auto Insurance,

Ms. Kim Doogan and Dr. Moez Rajwani, Coalition Co-Chairs

List of Supporting Coalition Member Organizations:

Ontario Association of Social Workers (OASW)

Ontario Chiropractic Association (OCA)

Ontario Physiotherapy Association (OPA)

Ontario Psychological Association (OPA)

Ontario Society of Occupational Therapists (OSOT)

Registered Massage Therapist's Association of Ontario (RMTAO)

Speech Language and Audiology Canada (SAC-Ontario)

Coalition of Health Professions in Auto Insurance