

# **HSP IAG FEEDBACK ON FSRA'S PROPOSED BUDGET & PRIORITIES**

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**PRESENTED TO FSRA'S BOARD - FEBRUARY 8, 2019**

## **A COLLABORATIVE SUBMISSION BY:**

The Ontario Rehab Alliance (ORA)

The Association of Independent Assessment Centres (AIAC)

The Coalition of Health Professional Associations in Automobile Insurance Services  
known as the “Coalition”



# ONTARIO REHAB ALLIANCE (ORA)

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The ORA represents 130+ healthcare organizations. These primarily small to medium sized businesses, located across the province, collectively employ approximately 4000 healthcare providers including physiotherapists, occupational therapists, speech language pathologists, nurses, chiropractors, psychologists, rehabilitation therapists, social workers, personal support workers, rehabilitation support workers and case managers.

Though focused on the interests and issues of health providers and their patients in the auto sector, our member organizations also operate in most other Ontario healthcare sectors. This gives us a wide-angled lens on healthcare.



# ONTARIO REHAB ALLIANCE (ORA)...

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We advocate for motor vehicle accident victims, adequate insurance benefits, and fair treatment of those injured. We provide education, networking and consultation opportunities for health service providers, and help our members to navigate the claims system with timely information bulletins on new requirements and issues, and with resources to support daily operations.

# THE COALITION OF HEALTH PROFESSIONALS IN AUTO INSURANCE SERVICES (COALITION)

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Representing over 10,000 front line health professionals from regulated health professions involved in the assessment and treatment of Ontarians after an auto accident.

## Organizations include:

1. The Ontario Chiropractic Association
2. The Ontario Physiotherapy Association
3. The Ontario Psychological Association
4. The Ontario Society of Occupational Therapists
5. The Ontario Associations of Speech Language Pathologists and Audiologists
6. The Registered Massage Therapists' Association of Ontario
7. The Ontario Association of Social Workers
8. The Ontario Dental Association



# ASSOCIATION OF INDEPENDENT ASSESSMENT CENTRES (AIAC)

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- AIAC is a non-profit association representing independent businesses as well as the thousands of health-care professional experts who perform Independent Medical Examinations (IMEs) in Ontario and across Canada.
- Our members perform neutral, third-party medical assessments of illnesses, injuries and treatment plans that result from auto, injury, and disability insurance claims. We also serve clients outside of the auto insurance industry, including corporations, pension funds, and the legal community.
- Our main objectives are to provide equal access to high quality independent medical examinations, maintain transparency in the assessment process, and – most critically – we work hard to minimize unnecessary costs and delays wherever possible.



# FSRA PROPOSED 2019-20 BUDGET PRIORITIES AND BUDGET

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- FSRA has identified sector-specific opportunities to reduce burden and improve regulatory effectiveness
- Section 8.1 is dedicated to the Auto Insurance Sector
- The HSP IAG commends the intention expressed in the preamble to include consumers and claimant representatives as well as healthcare practitioners and legal representatives with an aim to improve the auto insurance system

# SECTION 8.1 AUTO INSURANCE SECTOR

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- We support the focus on the four key auto sector priorities identified in section 8.1
  - Streamline Rate Regulation
  - Support Auto Reform Strategy
  - Review Health Service Provider Regulation
  - Develop Fraud Reduction Strategy
- This presentation will comment on Auto Reform, HSP Regulation and Fraud Reduction.



## 8.1.2 SUPPORT AUTO REFORM STRATEGY

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- “.... *Consumers are interested in getting the best possible policy for the lowest price...*”
  - Accident Benefits (AB) must be a priority due to the lack of available resources within the publicly funded system and its capacity to deliver services to victims promptly
  - We are not confident that consumers have a strong understanding of what constitutes the best possible policy, *other* than price differentials
  - Rehabilitation effectiveness is at its highest early on and diminishes with time
  - AB is critical for both at fault and not-at-fault groups. Current AB limits for serious injuries are insufficient.

## 8.1.2 SUPPORT AUTO REFORM STRATEGY...

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- It is vital that the importance of sufficient med/rehab benefits, expedited access to those benefits, and examination of insurer claims management practices be considered
- Auto insurance is an overly difficult product to use when needed

### Cost Savings:

- Proactive treatment within a sufficient benefit level will lead to not only the desired outcome for victims but also cost reduction to all premium holders
- Significant cost savings can be found through modernizing and improving processes and workflows in the current system

## 8.1.2 SUPPORT AUTO REFORM STRATEGY...

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- We believe it is possible to improve and expedite access to treatment while maintaining appropriate checks and balances
- Independent Medical Exams (IMEs) are an integral and necessary check and balance mechanism. They provide efficient, timely and cost effective “second opinions” to inform decision making and resolve disputes when used judiciously, and when completed by credentialed professional IME providers/assessors. There are opportunities for improvement through the creation and implementation of standards.
- Many IME facilities have international and recognized accreditations that go beyond the current scope of licensing, but provide valuable insight for the standardization and automation we are supporting

## 8.1.2 COLLECTING A STRONG EVIDENCE BASE FOR POLICY DEVELOPMENT

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- Governance of HCAI, as the source of most data in this sector, should shift from IBC to the regulator.
- Data input and access should be modernized to reduce administrative costs for all stakeholders.
- HCAI should be expanded to include data analysis for insurers, HSP's and direct stakeholders.
- Evaluate the current consumer knowledge base on the topic of auto insurance policy components and the experience of MVA claimants
- Collect and analyze data on the purchase of optional benefits

## 8.1.2 COLLECTING A STRONG EVIDENCE BASE FOR POLICY DEVELOPMENT...

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- Look at the viability of current benefit levels and claims management practices to deliver effective, appropriate and timely treatment
- Consider the data demonstrating the financial benefits of proactive healthcare interventions
- Identify system cost contributors to consumers' premiums *other than Med/Rehab Accident Benefits*, such as:
  - Distracted driving
  - Towing and storage
  - Vehicle repairs and rentals

## 8.1.2 APPROACH – HSP IAG SUPPORT TO AUTO REFORM

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From Launch and Ongoing:

- Identify areas that are most significant system pain points
- Contribute to meaningful solutions
- Anticipate effects on patients and providers of proposed solutions
- Support and strengthen stakeholder engagement
- Offer concrete suggestions to enable innovation and modernize processes
- Connect our approach back to the government's goal of ending hallway healthcare

## 8.1.3 REVIEW HEALTH SERVICE PROVIDER REGULATION

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- *“...how such health service providers should be regulated by FSRA or another entity and how those regulatory activities benefit our auto insurance system...”*
- *“...streamlining the licensing process and revising the approach to supervision of health service providers, including examinations, to achieve the desired regulatory objectives...”*

## 8.1.3 APPROACH – HSP IAG SUPPORT TO HSP REGULATION REVIEW FROM LAUNCH & ONGOING

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Insight, data and support of stakeholder engagement re:

- HSP experience of licensing with concrete examples and suggestions for changes
- Feedback on data collection and filing requirements through the lens of establishing meaningful service standards that protect the public interest
- Employing innovation and technology to improve efficacy, efficiency and reduce burden
- Understand the role and scope of other regulatory regimes in the sector
- Changes and expansion HCAI to improve data collection and data validation by stakeholders, enhance usefulness for claims management, and link or merge with data collection and reporting functions of the Annual Information Return (AIR)



## 8.1.4 DEVELOP FRAUD REDUCTION STRATEGY

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- “.... to enhance public confidence and contain costs by taking an active role in reducing fraud, both in health and vehicle repair claims.”
  - Expand focus to include vigorous examination of potential fraud control measures across all aspects the system, such as:
    - Towing
    - Storage
    - Rentals
  - Include public education to enhance understanding of auto insurance policies and coverage rather than solely talking about fraud as a cost driver

THANK YOU.

WE HOPE TO CONTINUE THE  
CONVERSATION...

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