

October 13, 2022

Hon. Peter Bethlenfalvy Minister of Finance Frost Building South 7th Floor 7 Queen's Park Cres. Toronto, ON M7A 1Y7

Dear Minister Bethlenfalvy,

In follow-up to our letter from May 25, 2022, we are writing to request an opportunity to meet with you to discuss ways to improve service and reduce costs for consumers and claimants in Ontario's auto insurance sector.

We appreciate your recent budgetary comments regarding the reduction of red tape in the auto insurance sector and would like to share insights and solutions -- on behalf of health care professionals who provide direct care for injured claimants – on ways to implement reforms to create a viable and sustainable auto insurance system.

The Coalition was formed in 1990 and represents eight regulated health professional associationsⁱ, 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). The Coalition has an important and unique multidisciplinary perspective on the needs of claimants and consumers in this system, and we have been honoured to represent our member associations and share our perspectives with the Financial Services Regulatory Authority of Ontario (FSRA) presently, its predecessor, the Financial Services Commission of Ontario (FSCO), and the Ontario Ministry of Health, over the past decades.

We are very pleased that the Ministry of Finance will be considering eliminating the requirement for consumers in motor vehicle accidents to exhaust employer-based extended health care (EHC) insurance prior to accessing the no-fault Medical, Rehabilitation and Attendant Care Benefit.

The current system disadvantages the insured, his/her family, and the claims process in several ways. For instance, if a claimant exhausts his/her employer based EHC benefits, this may leave the claimant and his family without any benefits for that calendar year. The present system of exhausting EHC also results in creating complexity to an already complex auto insurance system. Having to demonstrate to an insurance company that the insured has exhausted EHC funding leads to delays in accessing care. We therefore recommend that auto insurance should be the first payor of services following a motor vehicle accident. Such action is necessary to safeguard consumer access to timely and robust medical rehabilitation accident benefits -- and will also conserve resources and capacity in the Province's overburdened public health system.

We believe it is a critical time to connect with you on the above-stated issues and would welcome the opportunity to meet at your earliest convenience.

Sincerely,

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

Ontario Association of Social Workers (OASW) Ontario Chiropractic Association (OCA) Ontario Dental Association (ODA) Ontario Physiotherapy Association (OPA) Ontario Psychological Association (OPA) Ontario Society of Occupational Therapists (OSOT) Registered Massage Therapist's Association of Ontario (RMTAO) Speech-Language & Audiology Canada

ⁱ The Coalition is comprised of the following member Associations: