

## **FSRA Submission November 18, 2019**

Julie Entwistle, Occupational Therapist

Thank you for the opportunity to submit this opinion. I am an occupational therapist and have been practicing in Ontario's insurance and private sector since 2000. As I currently work in a capacity of innovation and operations for a firm with 100 OT's and 150+ clinicians, I have daily experiences with the challenges faced by health care providers working in this sector. I am also the current president of the College of Occupational Therapists of Ontario but submit this opinion to you as a clinician.

My thoughts are compiled further to the review of the FSRA mandates, draft statement of priorities and budget, and my participation in the meeting with Management on November 12, 2019 as part of the Health Service Providers Stakeholder Advisory Committee. While time did not permit the formation of a more thorough and robust opinion on the challenges and solutions, my top three most pressing issues that I feel relate to the FSRA mandate are as follows:

### **Burden Reduction**

The FSRA literature states that the "value of data is limited due to FSRA's ability to access, share and process data in a timely way..."

I opine that to be able to analyze data to make timely and informed decisions, FSRA needs to consider the source of the data and the quality of this upon input. HCAI is the channel by which the work of service providers is submitted for consideration, and payment, and becomes a communication tool between insurers and providers. Unfortunately, with thousands of codes available for both injuries and services, standardization and consistency does not exist. For example, there are multiple ways I can code "broken finger" and another handful of choices for coding my assessment. The first step in data analysis needs to include FSRA completing a deep dive into the coding process, and how HCAI can be more effectively used by providers (code streamlining and efficiencies) and insurers (responses, challenges and trends). Only after this unbiased review and assessment will FSRA be able to properly trust and use the data to inform proper regulation, while also streamlining the use of this to the benefit of health service providers and insurers going forward.

### **Regulatory Effectiveness**

As FSRA is aware, many providers working in this sector are already regulated by oversight bodies that ensure they are credentialed, have access to practice support, quality assurance requirements, and that monitor professional conduct. Many of these regulators oversee professional and business practices, thus eliminating the need for double oversight. Further, at its worst, FSRA's only power would be to remove a provider's ability to invoice insurers, while a regulatory college could revoke their ability to practice altogether. Thus, professional regulation has considerably larger handcuffs. It is suggested that FSRA continue to work with the colleges to understand the high-risk professions, those that more commonly offend, and the ratios of providers to problems in the sector to build a matrix of who may and may not need additional oversight. Not painting all professions with one brush is important to ensure FSRA is regulating what it needs to, and not regulating because it can.

**Protecting the Public Interest**

You cannot adequately protect an uninformed public. Like the regulatory colleges, protecting people needs to require that you also educate them on what to expect in the first place. Currently, I see a lack of public education in your priorities and on your website. While I appreciate that people should have “insurance literacy,” the reality is they don’t because this is a mandatory product and thus people buy based on price, not coverage. At the time of claim people hire lawyers because they don’t understand their policy, and because the process for claiming is complicated, overwhelming, and often met with scrutiny about injuries and needs. Clarifying for the public what basic insurance includes, what options exist, and things to consider, would be a valuable tool for consumers both pre-purchase and post-claim. This would connect you, the regulator, to the public you are aiming to protect. I don’t feel that public education should be absent from the mandate of FSRA as the body responsible for ensuring insurance products are delivered appropriately by providers.

Again, I thank you for the opportunity to submit this opinion.

Regards,

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