



IBC·BAC
Insurance Bureau of Canada
Bureau d'assurance du Canada

Amanda Dean

*Vice-President, Ontario & Atlantic
Vice-présidente, Ontario et Atlantique*

902.402.1028
adean@ibc.ca

777 Bay Street, Suite 1900
P.O. Box 121, Toronto, ON M5G 2C8

November 28, 2024

Financial Services Regulatory Authority of Ontario
Auto Insurance Sector
25 Sheppard Avenue West, Suite 100
Toronto, ON M2N 6S6

Re: Health Service Provider Framework Review

Thank you for providing Insurance Bureau of Canada (IBC) with the opportunity to comment on the Health Service Provider Framework (HSP) Framework review. We support the government's Budget decision to direct the Financial Services Regulatory Authority (FSRA) of Ontario to find administrative and cost efficiencies and develop a more modern and efficient HSP licensing system. While this is important, it is critical that these efforts not come at the expense of reducing or mitigating fraud-fighting measures in place, the costs of which are borne by all Ontario drivers.

Of the initiatives proposed by FSRA, we believe that Initiative A, a new software system, and Initiative C, enhanced cooperation and collaboration with Regulatory Health Colleges (RHCs) will have the most positive impacts on the province's automobile insurance framework. Further commentary on these initiatives are below.

Initiative A - Modernize HSP Licensing Through FSRA Process and System Improvements

For this initiative, we support the efforts that FSRA proposes taking to improve the HSP licensing process.

Regarding the new software system that FSRA will introduce for the licensing process, our expectation is that the information currently exchanged between FSRA and Health Claims for Automobile Insurance Processing (HCAIP) to support the licensing process will continue to be available in the new system as this is beneficial to the licensing process and to the health care facility and insurer users of HCAI. We encourage early dialogue with the HCAIP team on this project to ensure that there is appropriate lead time for HCAIP and HCAI users to make and test any required system changes prior to the new licensing system going live.

Additionally, as outlined in the consultation paper, FSRA issues licenses to business entities rather than individual health care providers themselves. This has created an oversight gap, whereby fraudulent clinics that are shut down through FSRA's enforcement actions, are able to re-open shortly thereafter under a different legal name.

To mitigate this practice, we recommend that in addition to the items proposed as a part of this initiative, FSRA work with stakeholders to embed a beneficial ownership structure identification for HSPs at the licensing stage. This should help reduce the frequency of fraudulent clinics re-opening under different names and continuing to bill through the HCAI portal.



Initiative C - Enhance Cooperation and Collaboration with Regulatory Health Colleges (RHC)

We support FSRA increasing its cooperation and engagement with RHCs. Both health care providers and insurers have a shared interest in reducing fraudulent billing and upholding the integrity of accredited college members that have a FSRA license. We believe that developing formal information-sharing agreements will support this shared goal.

As a part of this initiative, we recommend that FSRA work with RHCs and other relevant stakeholders to embed college licensing information in the HCAI database. Presently, there is minimal validation done for the information provided from RHCs, such as license number and active license status. This would help address issues of health care provider identity theft.

Once again, IBC appreciates FSRA's efforts to fight fraud in the automobile insurance system. If you have any questions, please do not hesitate to reach out.

Sincerely,

Amanda Dean
Lobbyist Registration Number 54385H

AD/jw