

November 29, 2024

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

Re: ***Consultation on Auto Reforms – ID:2024-011
Health Claims for Auto Insurance (HCAI) System Review***

To Whom It May Concern:

Thank you for the opportunity to provide comments on this Consultation.

We are responding on behalf of the members of the Ontario Mutuals Insurance Association.

Our Association represents provincially chartered farm mutual insurers from across the province. Our trading areas are primarily in rural Ontario. All our mutuals are 100% participating mutuals; there is no share capital and ownership of the mutual rests with the policyholders.

Each of our mutuals is over one hundred years old with the first of our mutuals being established in the 1850s. We have a long history of providing affordable insurance and ensuring availability to policyholders through both hard and soft market cycles.

Our primary products are farm insurance, home insurance, auto insurance, and small business insurance.

Our comments on HCAI will be at a relatively high level and will address the four priorities set out in the consultation document, those being:

- Initiative A – Prioritize Increasing the Number of Forms Transmitted Through HCAI.
- Initiative B – Prioritize Revising Forms.
- Initiative C – Prioritize Data-related Initiatives.
- Initiative D - Prioritize other initiatives.

We believe prioritizing data-related initiatives should be given the greatest consideration. As with any database, an ongoing effort to enhance data integrity is warranted. In doing so, we recommend a focus on those data areas where there is clear utility to stakeholders and the greatest opportunity

to provide a clear picture as to outcomes on treatment. Data initiatives could also consider integration with data feeds from Regulatory Health Colleges.

We also believe that data initiatives should consider better output reporting and look at opportunities to use analytics to mitigate fraudulent activity.

We have not included in our comments significant consideration on some of the more technical aspects of operating within the HCAI system for service providers or insurers but would support constructive suggestions that make increase user efficiency and lower the administrative burden.

We also trust that FSRA will consider key findings and initiatives from the SABS Guideline Review and the HSP Framework Review for integration in coordination of efforts in any of the three consultation areas.

Thank you for the opportunity to provide comments.

Yours truly,

A handwritten signature in blue ink that reads "John L. Taylor". The signature is written in a cursive style with a large initial "J" and "T".

John L. Taylor BBA, FCIP, FCLA, CHRL
President