

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
Review of Health Service Provider (HSP) Guidelines and Frameworks***

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.

We believe that licensing of health service providers under the Ontario automobile regime has been helpful and provides some degree of consumer protection. We believe that modernizing the process with system improvements would be beneficial. We also believe that health service providers will also have some significant insight into how this might be improved.

We recognize that the bulk of the health service providers are invaluable stakeholders in helping accident victims recover from injuries. We believe that any licensing regime should continue to provide appropriate levels of focus in ensuring fraudulent activity where bad actors are flagged and removed from the system with safeguards to ensure against reentry. We believe that since bad actors are a small fraction of the overall health service provider community, focusing on fraud


detection and prevention through the licensing system will be beneficial to all stakeholders.

We also encourage FSRA to work as closely as possible with the regulatory health colleges on licensing, supervision, basic data sharing, and verification of registration status.

We believe that in previous regulatory regimes there were some significant audits or assessments of health service providers for administrative compliance, and we recommend that FSRA give some thought as to communicating the level of activity on assessments and the overall general results of those reviews.

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