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November 29th 2024

Financial Services Regulatory Authority of Ontario

25 Sheppard Avenue West, Suite 100

Toronto, Ontario M2N 6S6

**Re: Submission on Health Service Provider Guidelines and Framework Review**

Dear Members of the FSRA Review Committee,

On behalf of Bayshore’s Therapy Divisions: Therapy & Rehab and Integrated Care Solutions, NRIO we appreciate the opportunity to contribute to the ongoing review of the Ontario auto insurance system. As a dedicated service provider within the brain injury and rehabilitation community, we are committed to ensuring that the revised guidelines and frameworks reflect the realities faced by healthcare providers and, most importantly, the clients we serve.

**Professional Services Guideline (PSG)**

One of the most pressing concerns within the current system is the lack of alignment between reimbursement rates and the cost of living. Since 2014, there has been no significant update to these rates, making it increasingly difficult to retain highly qualified Registered Health Professionals (RHPs). Stagnant pay scales hinder our ability to offer competitive compensation, exacerbating the shortage of skilled practitioners. This is particularly concerning in fields such as occupational therapy, where demand is high, but supply is constrained.

Furthermore, we urge FSRA to consider expanding the scope of regulated professional groups to include behaviour therapists, and registered massage therapists (RMTs). Additionally teachers and Kinesiologists are missing from the professional groups. These professionals play a crucial role in comprehensive rehabilitation but are currently underrepresented in the guideline framework. Without market-aligned compensation for these roles, service providers struggle to attract and retain talent, limiting the quality and availability of care for clients recovering from motor vehicle accidents (MVAs).

**Attendant Care (AC)**

The existing framework for attendant care reimbursement is insufficient to meet clients’ needs. While Form 1 is a useful tool for calculating required care, its implementation as a payment cap creates significant challenges. The current rate structure is well below market standards, making it difficult to recruit personal support workers (PSWs) and other essential care providers. This often leaves occupational therapists in an ethical bind, recommending levels of care that are practically unattainable under existing funding limits.

For example, 24-hour care for a client may be assessed at $16,000 per month, but the current system caps this at $6,000—far below what is needed to provide adequate support. This discrepancy leaves many clients unable to access essential services, exacerbating wait times and placing further strain on the healthcare system. We strongly recommend revising the cap to reflect realistic care costs and ensuring that Form 1 remains a calculation tool, not a payment ceiling.

**HCAI System**

The proposed changes to the Health Claims for Auto Insurance (HCAI) platform do not address the technological needs of modern healthcare providers. The system’s current limitations create inefficiencies and hinder effective service delivery. Key features like autofill, real-time error checking, messaging, and automation for recurring claims would help minimize mistakes and expedite submissions. Enhancing the platform’s capabilities will be essential to ensure it meets the evolving needs of users and supports streamlined operations.

**Health Service Provider (HSP) Framework**

We also urge FSRA to provide evidence demonstrating the effectiveness of current fraud mitigation strategies within the HSP licensing framework. While we support efforts to maintain the integrity of the system, proposed changes should address specific, identified issues rather than imposing broad, costly measures that may not yield proportional benefits. Additionally, integrating HSP licensing checks within the HCAI system would ensure real-time compliance and reduce administrative burdens.

In conclusion, we believe that these revisions are crucial to creating a more equitable, efficient, and client-centered auto insurance system. By addressing these key areas, FSRA can help ensure that service providers can continue to deliver high-quality care to Ontario’s brain injury community.

Thank you for your attention and consideration. We look forward to collaborating further to support meaningful improvements to the system.

Sincerely,

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