



I am writing to you as the Director of Lawlor Therapy Support Services Inc., a Rehabilitation Support Worker service provider with over 27 years of experience in Southwestern Ontario. We specialize in delivering community-based rehabilitation support services for individuals recovering from catastrophic injuries due to automobile accidents.

Over the past several years, we have faced significant challenges that threaten our ability to continue providing the level of care and service that our clients need and deserve. These challenges have primarily arisen due to funding constraints, staffing shortages, and increasing operational costs. As a result, we are seeking your attention and support in addressing these issues that are directly affecting both the quality of care and the well-being of individuals in need of rehabilitation services.

The last significant rate increase for **rehabilitation services** under Ontario's **Statutory Accident Benefits Schedule (SABS)** occurred in **2010**. In the past 14 years there has been no changes despite inflation and rising costs of healthcare delivery.

Staffing Shortages and Recruitment Challenges Due to Rate Freezes

A major issue we are currently grappling with is the shortage of skilled Rehabilitation Support Workers (RSWs). Many of our current staff are leaving for public sector positions where wages are significantly higher. As a result, we are experiencing difficulty recruiting and retaining qualified RSWs who are crucial to the implementation of individualized rehabilitation plans for our clients. This shortage not only impacts the quality of care we provide, but it also puts additional stress on our remaining staff, leading to **increased turnover and burnout**.

Travel Time and Costs

Our RSWs spend much of their time on the road, traveling between clients' homes to provide one-on-one care. This travel is essential, as it allows us to offer personalized services in the clients' own environments, where rehabilitation is most effective. However, the costs associated with travel are becoming unsustainable.

Currently, our RSWs are not reimbursed for travel kilometers, unlike other professionals such as auto **insurance adjusters**. They must cover the costs of business insurance, vehicle maintenance, and gas, as well as deal with the significant wear and tear on their vehicles. These out-of-pocket expenses create a financial strain on staff, making it harder for us to maintain an adequate workforce, particularly in rural or underserved regions where travel distances are greater.

Impact on Service Delivery in Rural and Underserved Areas

As we continue to operate across Ontario, clients in rural and remote areas face even more pronounced challenges in accessing timely and effective rehabilitation support. Many of our skilled RSWs are unwilling to travel long distances due to the significant travel-related costs and the lack of compensation. This has led to an **unequal distribution of care**, with rural clients having



more difficulty receiving the attention they require for their rehabilitation. The **lack of accessible services** in these regions is particularly troubling, as individuals recovering from catastrophic injuries in these areas may face delays in receiving vital treatment, leading to slower recovery times and worse long-term outcomes.

Denials of Necessary Activities

Insurers are often denying critical aspects of the Rehabilitation Support Workers' (RSWs) roles, dismissing them as "the cost of doing business." This includes essential activities such as case planning, the communication and collaboration with regulated health professionals, as well as the **incurred travel costs** for visiting clients.

Denials of Necessary Communication and Collaboration with Regulated Professionals: As part of the rehabilitation process, RSWs work closely with regulated health professionals (e.g., occupational therapists, physiotherapists) to implement personalized care plans for clients. This collaborative work ensures that the client receives comprehensive care, but insurers are often denying the reimbursement for the time spent on team communication. Denying reimbursement for these communications undermines the interdisciplinary approach to rehabilitation, where timely and effective coordination between team members is critical. If RSWs cannot engage in these necessary discussions or if they are expected to provide them without compensation, it puts both the quality of care and the RSWs' well-being at risk. It also leads to an increased workload for RSWs: By not compensating for communication time, insurers are effectively asking RSWs to work for free, placing additional stress on already underpaid workers. This can lead to burnout, lower morale, and increased turnover, further exacerbating staffing shortages.

Denials of Case Planning. Insurers frequently deny coverage for essential case planning activities, which are a crucial part of the rehabilitation process. Case planning is required before Rehabilitation Support Workers (RSWs) can visit clients to implement therapy activities and during ongoing treatment. Planning is a crucial step in determining the appropriate therapeutic interventions tailored to each client's needs. Without this time to prepare, RSWs cannot effectively design and implement rehabilitation strategies that align with the client's care plan, as directed by regulated health professionals.

Denials of Incurred Travel Costs. Rehabilitation Support Workers (RSWs) are not only required to travel extensively throughout the day, without mileage compensation, to visit clients in their homes, but they are also being asked to transport clients to community therapy appointments and other activities, without compensation. This practice again places an undue financial burden on our staff, who are already facing underpayment for their essential services.

Given the challenges mentioned, we urge you to consider the following:

- 1. Increasing rates for Community-Based Rehabilitation Services:** We request increased funding for community-based rehabilitation services, allowing providers like us to hire



and retain skilled staff and ensure that our clients receive the care they need without facing financial barriers.

- 2. Approve Communication, Planning and incurred Travel Costs:** We request that insurers fund essential activities such as case planning, communication and collaboration with regulated health professionals, as well as the **incurred travel costs** for visiting clients. These activities are not the “cost of doing business”, they are the costs of essential activities required to provide quality care.
- 3. Fair Compensation for Travel:** We request that policies be updated to ensure fair and reasonable reimbursement for the travel costs incurred by RSWs. In general, for employees who use their personal vehicles for work-related travel, the typical rate is based on the Canada Revenue Agency (CRA) guidelines. The CRA's recommended mileage rate for employees using their personal vehicles for business purposes is: \$0.68 per kilometre for the first 5,000 kilometers driven \$0.62 per kilometre for any additional kilometers beyond 5,000 in a calendar year. This would help alleviate the financial strain on staff and improve recruitment and retention.
- 4. Streamlined Reimbursement for Insurance Providers:** We urge policymakers to advocate for streamlined reimbursement procedures for rehabilitation services, especially in cases involving catastrophic injuries. Simplifying reimbursements would significantly reduce administrative burdens and improve the efficiency of service delivery.

At Lawlor Therapy Support Services Inc, we remain deeply committed to providing high-quality rehabilitation services to those who need them most. We believe that with your support, we can continue to meet the growing demand for services and overcome the challenges posed by funding shortages and operational barriers.

Thank you for taking the time to consider these pressing issues.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Cunningham".

Angela Cunningham

Director

Lawlor Therapy Support Services Inc.