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August 22, 2023

The Hon. Parm Gill
Minister of Red Tape Reduction
7th Floor - 56 Wellesley Street West,
Toronto, ON M5S 2S3

Dear Minister Gill,

Re: OCF-18 Treatment and Assessment Plan

I am writing to you as the Executive Director and Chief Executive Officer of the Registered Massage Therapists Association of Ontario ("RMTAO") to request that the Statutory Accidents Schedule ("SABS") be amended to include Registered Massage Therapists (RMTs) as part of the definition of "health practitioner" in Subsection 3(1). This would allow RMTs to sign OCF-18 Forms: Treatment and Assessment Plan. The OCF-18 form is used to request approval from an insurance company for medical and rehabilitation benefits for an individual who has sustained injuries in a motor vehicle accident. At the present time, subsection 3(1) of the SABS authorizes only those professionals listed in the definition of health care practitioner, which does not include RMTs, to sign an OCF-18. Attached is a copy of Section 3(1) of the SABS and the OCF-18 Form.

On March 10, 2023, I wrote to Ann MacKenzie, Senior Manager, Policy Interpretation at the Financial Services Regulatory Authority of Ontario (FSRA), Ontario's auto insurance regulator, to request that FSRA remove the requirement for an RMT to have a listed health practitioner co-sign the OCF-18 when the RMT is treating individuals who have sustained injuries in a motor vehicle accident. It is within the scope of practice of RMTs to assess and treat these patients independently without the requirement to involve any other health professional, and RMTs already do treat these patients independently. Ms. MacKenzie responded by informing me that FSRA has no jurisdiction to make the changes we requested as only the government can introduce legislative and regulatory amendments to the Insurance Act and the SABS. Attached is a copy of my letter to Ms. MacKenzie, together with her email response.

We believe that allowing RMTs to sign the OCF-18 form will streamline the treatment process, reduce red tape and ultimately enhance patient care. In that regard, we believe that:

1. RMTs are highly skilled healthcare professionals who specialize in assessing and treating musculoskeletal injuries. Their therapeutic care contributes to patient recovery. Allowing RMTs to sign off on OCF-18 forms would expand the range of treatment options available to patients who have been in car accidents, giving them timely and comprehensive care that aligns with their specific needs.

2. Under the current system, an RMT must solicit the signature of another healthcare professional listed in the SABS before they can submit the form to an insurer. This involves multiple steps between the two regulated health care professionals. Allowing RMTs to independently sign the OCF-18 would remove an unnecessary administrative burden which would lead to quicker and more efficient initiation of treatment for the injured patient.

3. Timely treatment is key to patient recovery from injuries. Delayed treatment negatively impacts recovery from injuries sustained in motor vehicle accidents. By enabling RMTs to sign OCF-18 forms, patients can access treatment without unnecessary delays and improve the chances of a faster recovery.

4. Injuries sustained in car accidents can have various physical and psychological implications. RMTs, through their expertise in musculoskeletal health, can contribute to a patient-centric approach to care. Integrating RMTs into the OCF-18 signing process acknowledges their valuable role in the recovery process and ensures that patients comprehensive care needed for recovery.

We are confident that allowing RMTs to sign the OCF-18 form will reduce red tape in the treatment and assessment process and expedite care to injured claimants. We would be pleased to discuss our recommendation with you at any time.

Yours truly,



Michael Feraday
Executive Director and Chief Executive Officer
Registered Massage Therapists' Association of Ontario

c.c. Richard Thompson, Chief of Staff
Kosta Zoes, Director of Policy
Juliana Van Gaalen, Senior Policy Advisor to the Minister of Finance
Sidney Hall, Director, Issues and Legislative Affairs, Minister of Health