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RMTAO.com RMTFind.com November 4, 2024

The Hon. Peter Bethlenfalvy Minister of Finance Frost Building South, 7th Floor 7 Queen's Park Cres. Toronto, ON M7A 1Y7

Re: OCF-18 Treatment and Assessment Plan

Dear Minister Bethlenfalvy,

I am writing to you in my capacity as the Executive Director of the Registered Massage Therapists Association of Ontario ("RMTAO") in connection with an issue that we raised with your office earlier this year. In a letter to you dated May 22, 2024, we requested that the Statutory Accident Benefits Schedule ("SABS") be amended to include Registered Massage Therapists ("RMT"s) as part of the definition of "health practitioner" in Subsection 3(1) of the SABS. This would allow RMTs to sign the OCF-18 Treatment and Assessment Plans forms in relation to care they provide to individuals to whom they are providing care following 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 to sign an OCF-18. Attached is a copy of our letter to you dated May 22. 2024, as well as a briefing note and a copy of the provisions of section 3(1) of the SABS.

This issue is of particular significance at this time because, as you are aware, the Financial Services Regulatory Authority of Ontario ("FSRA") is currently undertaking various consultations in respect of Health Claims for Auto Insurance ("HCAI") and the Professional Services Guideline ("PSG"). In that regard, FSRA's review of the PSG and HCAI provides a timely opportunity to ensure that the SABS is up-to-date and inclusive of healthcare professionals that provide needed care to injured claimants. Including RMTs as signatories on the OCF-18 reflects the actual landscape of healthcare services available to accident victims.

One of FSRA's objectives in reviewing the PSG and HCAI is to ensure that there is an efficient and cost-effective transmission of healthcare provider information between insurers and healthcare providers in respect of claims made under the SABS. Currently, RMTs must have OCF-18 forms signed by another regulated healthcare provider. As a practical matter, this is not conducive to either efficiency, cost-effectiveness or timely access to care. Especially in cases where RMTs are the primary providers in the

rehabilitation process, allowing their direct involvement in the claims process will lead to faster approvals and reduced administrative costs.

We would be pleased to meet with you at your convenience to discuss our request.

Yours truly

Michael Feraday

Executive Director & CEO

Registered Massage Therapists' Association of Ontario

Cc: Taylor Putnam, Director of Budget and Strategic Initiatives, Office of the Hon. Peter Bethlenfalvy

Jaiman Chin, Head of Policy and Budget, Office of the Hon. Peter Bethlenfalvy

Corey Naimark, Manager, Property and Casualty Insurance Policy, Ministry of Finance