



January 22, 2014

Richard Tillman
Senior Manager, Corporate Policy and Issues Management
Financial Services Commission of Ontario

Heather Driver
Senior Manager, Auto Policy
Financial Services Commission of Ontario

BY EMAIL

Dear Richard and Heather,

I am writing on behalf of the Ontario Society of Occupational Therapists (OSOT) in relation to the regulation development to support licensing of clinics offering rehabilitation services in Ontario's auto insurance system.

To date, the Society and our Auto Insurance Sector Team have seen the release of preliminary regulations around licensing. OSOT was not invited to any consultation process prior to this release and have had no opportunity thereafter to comment or review directions or drafts of the emerging regulations that will, we understand, significantly affect our members working in this sector. While we understand that two members (neither of whom are occupational therapists) of the Coalition of Professional Associations in Auto Insurance (of which OSOT is a member) sit on the Service Provider Business Licensing Implementation Forum, we understand that they are limited in what they are able to share about the work of this forum. These representatives are provided with proposed regulations/recommendations at each meeting for review and response within the meeting and, we are told, are limited by a confidentiality agreement which restricts any meaningful consultation about these proposals with members or other organizations involved in the Coalition. While we are respectful of our colleagues input, we are concerned that this requires insight into the potential impacts of proposed regulations on all types of practice models across professions. OSOT is concerned and wishes to assure that the licensing of occupational therapists—some of whom are single practitioners in remote areas--will not be so onerous and/or present obstacles so as to limit access to OT treatment for consumers. Further, we believe that our insights representing front line clinicians may be of value during this licensing regulation development process.

Our members have expressed concern around the recent release of regulations without consultation with stakeholders. By way of example, we have recently seen the release of regulations around Attendant Care and the MIG which will be enforced as of February 1, 2014

and for which only a technical review was offered. In our opinion, this is not meaningful consultation and not all Associations were invited to participate. We are hopeful that this will not be the case with regulations around licensing.

We understand there are time pressures to complete licensing regulations, however, this is an important new step for Ontario health care practitioners, and we hope to inform the process with constructive feedback. We'd be pleased to talk about opportunities for consultation on this issue.

Sincerely,

A handwritten signature in black ink that reads "Christie Brenchley". The signature is written in a cursive, flowing style.

Christie Brenchley

Executive Director

Ontario Society of Occupational Therapists

~ Leading by providing vision, voice, visibility and value for Ontario occupational therapists