



May 13, 2021

Deepak Anand, MPP
Chair
Standing Committee on Social Policy
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park,
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By email: Deepak.Anand@pc.ola.org
(cc Tanzima Khan by email: comm-socialpolicy@ola.org, please distribute to members of the Committee)

To Committee Members,

On behalf of the Canadian Life and Health Insurance Association (CLHIA), we are providing our comments on *Bill 283: Advancing Oversight and Planning in Ontario's Health System Act, 2021*. Our comments, in particular, are on Schedule 2, Health and Supportive Care Providers Authority Act 2021 as well as on Schedule 4, Psychology and Applied Behaviour Analysis Act, 2021.

The CLHIA is a voluntary trade association with member companies that account for 99 per cent of Canada's life and health insurance business. In 2019 the life and health insurance industry provided approximately 10 million Ontario residents with supplementary health benefit coverage and reimbursed roughly \$16 billion for healthcare goods and services, including prescription drugs, dental, mental health services, nursing, hospital and vision care.

Background

Health benefit plans provided by insurers to employers generally include a selection of regulated healthcare providers. This will vary by plan depending on the needs of the employer providing the plan.. However, since most plans are national and regulation occurs at a provincial level, in order to provide equitable access to care for employees, there are times when unregulated healthcare providers are also included in a benefit plan. In these situations, , insurers will have established criteria that typically aligns to provinces where the profession is regulated including, among other things, educational requirements, patient complaint process, and maintaining ethical standards in order to consider claims..

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Considerations

Bill 283, Schedule 2, proposes to provide some oversight of certain types of professionals, including personal support workers. As a general principle, life and health insurers support regulation of healthcare professionals for protection of the public so support several parts of the legislation, including the establishment of a public registry, mandatory reporting by the Registrar when registrants are found guilty or charged with certain offences, and the establishment of procedures for complaints and investigations.

However, in order to increase the protection of Ontarians, we would suggest that registration be made mandatory for the healthcare professions identified now and in future as falling under this Act.

As well, title protection is a necessity in order to provide clarity for Ontarians as to who is able to practice using a title identified in the Act. Having title protection provides confirmation to Ontarians that their healthcare provider has met certain requirements such as education.

Lastly on Schedule 4, it is not clear whether the new Authority will be extended in future to other healthcare professions. We'd request that this be made clear in the legislation.

Schedule 4 repeals the *Psychology Act 1991* and replaces it with the *Psychology and Applied Behaviour Analysis Act, 2021*. We applaud this change that will ensure regulated Behaviour Analysts will soon appear on registers and will be required to follow all of the expectations set out by the College of Psychologists and Behaviour Analysts of Ontario.

Thank you for the opportunity to provide comments on behalf of the insurance industry. We would be pleased to discuss further or provide any other information as needed. Please feel free to contact me at jweir@clhia.ca or 416-359-2003.

Sincerely,

Signed by Joan Weir

Joan Weir
Director, Health and Disability Policy