



Canadian Society of Medical Evaluators (CSME) brief regarding:

Proposed Auto Insurance Reforms authored by the Ministry of Finance and released November 2, 2009

About us

- CSME is a National organization established in 1992 to develop policies, guidelines and provide continuing medical education programs relating to the provision of third party examinations. Since our inception, we have been providing multiple educational programs every year, in addition to developing a national breakfast seminar series. We have recently embarked on a collaborative effort with the University of Montreal to offer a three year program in Insurance Medicine and Medical Legal Expertise.
- CSME has, and continues to work with and consult with the Federal Government, Provincial Governments, FSCO, the WSIB, Insurers, and Lawyers, in developing guidelines related to the differing requirements of each of these sectors for third party medical evaluations.
- In 2006, we expanded our membership to non-physician examiners in order to broaden our representation of all types of health care professionals who conduct third party examinations. All of our members are expected to be involved with clinical practices in their respective disciplines, in order to meet the credibility test when performing third party examinations.

Comments on Proposed changes to the SABS

1. Under the section of the recommendations Measures to Protect Consumers, bullet number 10 states “The health care professional associations and the insurance industry should jointly develop standards for the delivery of third party medical examinations as well as qualifications for assessors. FSCO would facilitate the process.”

CSME is the only organization that offers medical and other health care professional evaluators the unique and valuable opportunity to govern and uphold their professional standards, share their knowledge and expertise, and promote their abilities as medical evaluators, while giving outside organizations expert information along with the assurance that they are being served by licensed and regulated professionals. As an organization with members from all health care professions, we have the ability to allow collaboration and input on the development of standards for the delivery of third party medical examinations to all professionals involved, and provide a structure for which the qualifications of assessors can be established and monitored.

We, as an organization, would propose CSME work with FSCO and all of our members' professional organizations and professional bodies to establish standards and qualifications for third part medical assessments. Specifically, it would be our proposal that, in conjunction with the above process, CSME be assigned as the organization through which standards and qualifications are established and monitored.

Additionally, in the section of the recommendations Measures to Streamline the Auto Insurance system and reduce Transaction Costs, Bullet number 4, it is proposed: a "Stakeholder advisory committee" be formed with one of its' mandates to, "Restrict the ability to conduct catastrophic impairment assessments to practitioners with appropriate training and experience."

CSME believes the mandate of this goal falls into the same category of Standards and Qualifications discussed above. It would be our proposal that the Stakeholders' advisory committee look to the process described above under the Measures to protect consumers section "The health care professional associations and the insurance industry should jointly develop standards for the delivery of third party medical examinations as well as qualifications for assessors. FSCO would facilitate the process." to provide the health care input into this goal of insuring training and qualifications for the ability to carry out catastrophic assessments.

2. Under the section Measures to streamline the auto insurance system and reduce transaction costs, bullet number 1 states, " Assessment costs would be limited to \$2,000 per assessment and the fee for completing forms including any assessment required to complete the form would be capped at \$200."

CSME fundamentally adheres to the principle that it is the right of its member professionals to be able to charge fees as set out by their professional governing bodies and the organizations which represent them. Implementing a fee cap would undermine this principle and right, which has already been established, in charging appropriate fees for services rendered. We are most concerned that any imposition of fee caps will have a negative effect on the provision of assessments and thereby compromise access to benefits which in turn will result in disputes which could otherwise have been avoided. Such disputes will only add further burden and costs to the system. We encourage FSCO and the Ministry of Finance to work on strategies to streamline the SABS system and allow for cost containment that does not interfere with the professions' respective fee schedules.

I would appreciate meeting with the Ministry of Finance to personally discuss our submission as outlined above.

Yours truly,

A handwritten signature in black ink, appearing to be 'D. Friars', written in a cursive style.

Dr. Douglas Friars, M.D., F.C.F.P.
President, CSME