



OACCPP

Ontario Association of
Consultants, Counsellors,
Psychometrists and
Psychotherapists

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ONTARIO ASSOCIATION
OF CONSULTANTS,
COUNSELLORS,
PSYCHOMETRISTS AND
PSYCHOTHERAPISTS

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Mr. Tom Golfetto
Executive Director
Automobile Insurance Division
Financial Services Commission
North York City Centre
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Mr. Golfetto:

This letter is intended to draw your attention to a group of regulated health professionals who regularly provide services under Health Claims for Auto Insurance (HCAI), and to argue for their fair compensation under the (Statutory Accident Benefits) SABS professional service guideline.¹

Registered Psychotherapists (RPs) are currently regulated by the College of Registered Psychotherapists of Ontario (CRPO), which was established under the Psychotherapy Act (2007), and came into full existence in 2015. As regulated health care professionals, RPs may now practice autonomously in the province of Ontario, and may submit treatment plans under their own licenses through HCAI.

It has come to our attention that adjusters from various auto insurance companies have been approving psychotherapy treatment plans submitted by RPs at \$58.19 per treatment hour. Such fees are much lower than those proposed for services on OCF-18 forms. Under the Superintendent's Guideline No. 03/14, \$58.15 per hour is the rate of an unregulated provider.

As a professional association with membership of nearly 2400 mental health practitioners, the OACCPP feels compelled to voice our concern about the treatment of RPs, who make up a significant portion of our membership. RPs are Regulated Healthcare Professionals and must undergo extensive training to earn their designation. Lower professional fees make it difficult for these regulated mental health professionals to remain in practice, which creates a

further barrier to treatment that can be extremely helpful to people dealing with psychological impairment as a result of motor vehicle accidents.

As regulated professionals, RPs have to deal with the same overhead costs as Psychologists and Psychological Associates yet by comparison RPs receive a treatment rate of only \$58.19 while their colleagues are granted a \$149.61 hourly treatment rate, almost 3 times higher for the same work. Under the Psychology Act (1991), these professionals are licensed to provide the same controlled act of psychotherapy as RPs, currently defined as:

Treating, by means of psychotherapy technique, delivered through a therapeutic relationship, an individual's serious disorder of thought, cognition, mood, emotional regulation, perception or memory that may seriously impair the individual's judgement, insight, behaviour, communication or social functioning.

We believe it is only fair that RPs are compensated at the same hourly rate to provide the same controlled act of psychotherapy that a Psychologist or Psychological Associate would provide in a claimant's treatment plan. We ask, therefore, that RPs be added to the professional services fee guideline referenced herein, at a rate of \$149.61 per treatment hour.

We hope that this letter will assist in facilitating an important dialogue about the issues outlined above. We invite you to contact us with any questions or concerns that you may have and look forward to discussing this matter further at your earliest convenience.

Respectfully submitted on behalf of OACCPP,

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President,
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Chair Public Policy & President – Elect
OACCPP

Cc: Deborah Adams, Registrar CRPO
Cc: Office of the Minister of Finance
Cc: Office of the Ministry of Health and Long Term Care

1. FSCO Professional Services Guideline, September 2014:
<https://www.fSCO.gov.on.ca/en/auto/autobulletins/2014/Documents/a-08-14-1.pdf>