

June 6, 2008

Mr. Willie Handler
Senior Management, Automobile Insurance Policy Unit
Financial Services Commission of Ontario
5160 Yonge Street, 15th Floor
Box 85
Toronto, ON M2N 6L9



Dear Mr. Handler:

**RE: Statutory Accident Benefits Schedule
Five Year Review
Treatment Plans (OCF 18)**

As outlined on the FSCO website, I am writing to provide you with my concerns regarding the role of Registered Nurses and Treatment Plans (OCF 18). Please note that I am a Registered Nurse and have been working in the rehabilitation field for over 16 years. I have acted in the capacities of a Rehabilitation Consultant providing case management services, National Director of Catastrophic Case Management Services for a Disability Management Company, and a Certified Life Care Planner completing Life Care Plans for settlement purposes. I am presently President of Linda Walker and Associates Inc. providing both case management and life care planning services.

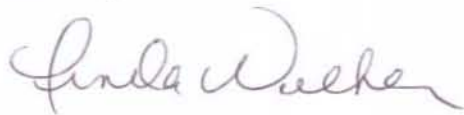
Under the present legislation, Registered Nurses are not able to sign their own treatment plans for the provision of case management. Our treatment plans have to be signed by another Regulated Health Professional who has been deemed a Health Practitioner for the purposes of the SABS. The irony of the situation is that we are asking Occupational Therapists, Physiotherapists, and Speech Language Pathologists, to sign our treatment plans that have little or no experience in the provision of case management. As we are often the first Regulated Health Professional assigned to a catastrophic file, we are often in the position where we do not have another Regulated Health Professional to sign our treatment plan. Physicians are difficult to contact and are hesitant to sign Insurance Forms. *This issue is creating a problem in the timely delivery of services to the injured person who typically has sustained a catastrophic injury.*

I have brought this issue to the attention of both my M.P.P. Peterborough, Mr. Jeff Leal and to the Honourable Dwight Duncan, Minister of Finance and have enclosed copies of their correspondence for your review.

I am requesting that Registered Nurses providing case management services, be permitted to sign OCF 18 (Treatment Plans) to avoid the delay in delivering case management services to injured persons. Care Plans are within our scope of expertise and practice. The inclusion of Registered Nurses with the ability to sign Treatment Plans for case management will ultimately benefit the injured person as our interventions will not be delayed by the often lengthy process of obtaining signatures from other Regulated Health Professionals.

Thank you in advance for your consideration. I can be reached at 705-652-9931 if you should require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Linda Walker". The signature is written in dark ink and is positioned above the typed name.

Linda Walker B.A., R.N., RRP, CLCP

Encl: Letter from Dwight Duncan, Minister of Finance dated April 23, 2008
Letter from Jeff Leal, M.P.P Peterborough dated March 19, 2008



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APR 23 2008

Ms. Linda Walker
Linda Walker & Associates Inc.
351 Charlotte Street, Suite 100
Peterborough, Ontario
K9J 2W1

Dear Ms. Walker:

Thank you for your letters regarding expanding the "health practitioner" definition under the Statutory Accident Benefits Schedule (SABS).

In your letters you outline the difficulties you are encountering processing treatment plans under the SABS while providing case management services to your clients. I have noted your concerns and recommendation to expand the definition of "health practitioner" to include registered nurses.

The definition of "health practitioner" for the specific purposes of the SABS is limited to certain health professions, within a particular scope of practice, that may certify disability and reasonableness of treatment. The list of health professions included in the definition is reviewed periodically. I appreciate your suggestion. It will be considered when the definition is reviewed next.

Thank you again for writing.

Sincerely,

Dwight Duncan
Minister

c: Jeff Leal, MPP, Peterborough
Michael Prue, MPP, Beaches-East York
Tim Hudak, MPP, Niagara West-Glanbrook
Bob Christie, CEO and Superintendent of Financial Services



Jeff Leal, M.P.P.
Peterborough

19 March 2008

Ms. Linda Walker, BA, RN, RRP, CLCP
c/o 351 Charlotte St, Suite 100
Peterborough, Ontario.
K9J 2W1

Dear Ms. Walker:

Thank you for copying me your letter of March 17th, written to the Honourable Dwight Duncan, Minister of Finance. I appreciated being informed of your situation and the problems the recent regulatory changes have created in the operation of your business.

I would be grateful if you would copy me the response that you receive from Minister Duncan. It is difficult for me to comment or follow-up with the government without knowing his response to your situation. I look forward to hearing from you in the future.

Sincerely,



Jeff Leal