

October 23, 2017

Ms. Elizabeth Witmer
Chair, Workplace Safety & Insurance Board of Ontario
200 Front Street West
Toronto, ON M5V 3J1

Re: Rate Framework Policy Consultation

Dear Ms. Witmer,

The Workplace Safety and Insurance Board (WSIB) has solicited oral and written submissions on the rate framework modernization of its classification structure by adopting the North American Industry Classification Structure System (NAICS). The new rate framework will change the way Schedule 1 employers are classified, and the way their premium rates are set and adjusted. As the voluntary professional organization which represents the dentists of Ontario, promotes the highest standards of dental care and advocates for sustainable and accessible care for all Ontarians, the Ontario Dental Association (ODA) appreciates this opportunity to provide feedback.

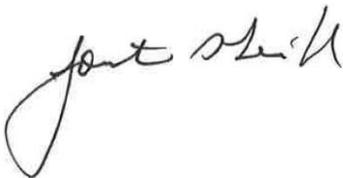
It is our understanding that under the new rate framework dental offices' premium rate would be set by going through the three steps of classification; class, subclass level premium rate setting, and employer level premium rate adjustments. Thus, the rate they pay would be influenced both by their individual experience and by the experience of their subclass. While the cited changes are laudable, the ODA is concerned that the premium rate for dental offices – many of whom chose to voluntarily register for coverage under WSIB – may see a significant increase post-implementation.

Bearing this in mind, the ODA respectfully recommends the WSIB consider and pursue the following:

- Ensure appropriate relief measures are provided to address costs resulting from injuries with pre-existing conditions.
- Ensure appropriate criteria are used under the new rate framework when determining affiliation as appropriate to premium rate setting.

On behalf of the ODA, we thank you for the opportunity to provide feedback. The WSIB has arrived at an innovative rate setting structure and committed itself to extensive stakeholder consultations throughout this process. Should you have any questions, please contact, David Gentili, Director of Professional and Government Affairs, at 416-355-2277 or dgentili@oda.ca.

Sincerely,



Dr. Janet Leith, Chair
ODA Health Policy and Government Relations Advisory Committee