



Nova Scotia
Physiotherapy
Association

January 30th, 2023

Office of the Superintendent of Insurance
Provincial Building
1723 Hollis Street
PO Box 187
Halifax, Nova Scotia B3J 2N3

AUTO INSURANCE REVIEW

The Nova Scotia Physiotherapy Association is appreciative to be included as key stakeholders in the process of reviewing and providing feedback to The Province of Nova Scotia, on proposed changes to the Nova Scotia Auto Insurance Product to help ensure that appropriate, affordable and stable coverage is available in Nova Scotia.

Please find our submission attached:

1. The Nova Scotia Physiotherapy Association's (NSPA) responses to the questions posed in your discussion paper.
2. A document is attached that was sent to the OSI in May 2022 requesting a review and increase in reimbursement rates for our services under Nova Scotia Protocol. The NSPA would encourage the OSI to model the system in BC, where rates paid to physiotherapists increased significantly with an agreed upon yearly rate to reflect inflation.

We welcome the opportunity to discuss any of our thoughts and feedback in this submission with your team.

Sincerely,

Monica MacDonald, PT
President
Nova Scotia Physiotherapy Association

Patricia Connors
Executive Director
Nova Scotia Physiotherapy Association



Proposed changes to Section A – Questions for Comment:

- What are your views on the proposed changes to the minor injury definition?
 - The Nova Scotia Physiotherapy Association does not have concerns with the proposed changes to the minor injury definition. However, there is concern with how minor injuries are viewed, particularly in terms of recovery and healing timelines. While a sprain/strain may be “minor”, there are instances when a sprain/strain may not be minor, and may not be appropriate to be labelled as such.
 - An opportunity for clinicians to communicate with adjustors regarding the severity of “minor” injuries would provide a chance to flag “minor” injuries that may not fall within the typical classification.
- What are your views on changing Nova Scotia’s minor injury cap?
 - What do you think the minor injury cap should be in Nova Scotia?
 - The Nova Scotia Physiotherapy Association does not have an opinion on, neither, changes to the minor injury cap, nor, the injury cap amount.
- Should the consumer have a choice as to what their minor injury cap is (i.e., have the option to pay a higher premium for a higher cap or no cap)?
 - Is this feasible from an industry perspective?
 - This change does not greatly affect the physiotherapy industry; however, Physiotherapists are in favor of freedom of choice for the individual. Given the experience of physiotherapists, it is imperative that informed consent underlie this change and consumers be truly understanding of to what they may be opting in or out.
 - The Physiotherapy profession provides an incredibly valuable service and encouraging cheaper options for health and recovery is not always in the best interest of the patient/consumer.

Proposed changes to Section B – Questions for Comment:

- What are your views on the proposal to expand the list of healthcare practitioners who are eligible to design a treatment plan under the Protocols to include nurse practitioners?
 - The NSPA is supportive of Nurse Practitioners being added.
- What are your views on the proposal to expand access to adjunct therapy under the Protocols to include dentists, kinesiologists, psychologists, psychiatrists, social workers, and counsellors?
 - The NSPA is supportive of expanding access to adjunct therapy under the protocols; however, the primary provided should remain as a physician, nurse practitioner, or physiotherapist. If other health providers are treating musculoskeletal injuries without guidance of a physiotherapist, it may interfere with the goals of the rehabilitation plan. Furthermore, the inclusion of kinesiologists on the list is



welcomed by the NSPA; however, their involvement needs to be under the supervision of a physiotherapist, rather than in a stand-alone role. Kinesiology is not currently regulated in Nova Scotia, but in the event that it became regulated, these individuals are not positioned to work with the complexity of motor vehicle claim when compared to a physiotherapist.

- Also, the addition of occupational therapy would be appropriate for this list.
- What are your views on the proposed aggregate coverage limit of \$1000 for dental and mental health services under the Protocols, and to not count visits for these services toward the number of authorized treatment visits?
 - While the NSPA supports not counting these visits towards authorized treatment visits, the Association feels that this does not foster a collaborative environment. Autonomous clinicians should be able to determine the needs of their patients without automatic caps on cost. Furthermore this may disadvantage those in rural areas or small clinics.
- What are your views on the proposal to amend the priority of payment for Section B benefits such that the auto insurance provider will become the first priority payor?
 - The NSPA is strongly in support of this.

Other Considerations

1. Sub-limits on Section B medical coverage

Questions for Comment:

- What are your views on the possibility of sub-limits for medical coverage under Section B (outside of the Protocols)?
 - The NSPA does not feel that sub-limits/hard caps improves access and provides the proper care needed. Autonomous professions should have the ability to design their treatment programs using evidence-based treatment and their clinical judgement. Delays in approval beyond sub-limit amounts or limiting treatment options does not act with the ethical principle of beneficence to which each profession is bound.
- If Nova Scotia were to introduce sub-limits for chiropractic, massage therapy, and acupuncture services, what should the limits be?
 - As previously discussed the NSPA is not in favour of individual professional sub-limits.

2. Insurance education for consumers

Questions for Comment:

- Do consumers have sufficient access to the information and education necessary to inform their decisions regarding insurance in Nova Scotia? Are there particular challenges for inexperienced drivers in this regard?



- The NSPA does not feel the majority of consumers we see have sufficient access or the education necessary to inform their decisions. It is common that physiotherapists are educating consumers on elements of their motor vehicle insurance.
- How could consumer awareness and education be improved?
 - Whether a social media campaign, or FAQ section, it is important that consumers be able to educate themselves on navigating the motor vehicle insurance program in Nova Scotia
- What role and level of involvement should the OSI have in providing insurance education for consumers?
 - Each resident of Nova Scotia should have the ability to educate themselves on the issues that they feel important, beyond any regular advertising or dissemination of information, which should be provided by the OSI.

3. General comments

Questions for Comment:

- Are there any other changes to Nova Scotia's auto insurance product that should be considered?
 - In this document it is briefly discussed that raising the fee schedule for physiotherapists has been considered. The NSPA, working alongside physiotherapists in the community, strongly believes this is integral for ensuring continued, high quality service to those injured in a motor vehicle accident. It has been brought to our attention that there is a concern that if rates do not increase (to minimally reflect the inflation rates since 2013), physiotherapy clinics may not be financially able to take on MVA patients. This would undoubtedly and disproportionately affect those in rural areas where access to care is already severely limited.
 - We would encourage the OSI to model the system in BC, where rates paid to physiotherapists increased significantly with an agreed upon yearly rate to reflect inflation.
<https://www.icbc.com/partners/health-services/providers/Documents/ICBC-fee-guide-for-health-care-providers.pdf>
 - Attached is a document sent to the OSI in May 2022 that we would like to share on behalf of this group, highlighting the concerns listed above.