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EMPLOYERS' ADVOCACY COUNCIL

The Hon. Steven Mahoney, Chair, Workplace Safety & Insurance Board

Thursday June 25, 2009

Experience Rating: Morneau Sobeco Report

On behalf of the Employers' Advocacy Council (EAC) and its 400 plus members, I would like to provide you with our position on the Morneau Sobeco Experience Rating Report dated October 28, 2008 and released in early March 2009. The EAC briefly discussed some of our concerns with you during our Stakeholder Consultation on March 12, 2009. The EAC does not support the recommendations outlined in the Morneau Sobeco report.

There is limited discussion about a retrospective or prospective experience rating program for Ontario. The report lacks clarity about intended purpose. Perhaps a prospective experience rating system for Ontario requires further investigation.

The EAC is concerned with the lack of a formal consultative process on experience rating. We support the introduction of a WSIB Consultation Policy so all stakeholders are included to participate in the process.

Eliminating advances will increase the number of lost-time injuries and not achieve the goals as outlined in the Road to Zero. The advances policy and experience rating programs are not well understood at the WSIB operational level. There is a need to develop a policy on advances and introduce a training package on experience rating for WSIB operations staff.

The EAC believes the Second Injury Enhancement Fund (SIEF) should be reviewed under a separate consultation process. The SIEF claims adjudication decision making process is mired with inconsistencies and needs to be tightened. SIEF is an important feature of experience rating and these decisions may have significant implications on return to work outcomes. Costs attributed to this fund have escalated drastically over the past few years: Ontario 32%, BC 11%, Alberta 4%. The EAC is committed to working with WSIB on the SIEF issue.

The EAC supports a new effective experience rating system for Ontario. I will commit on behalf of the EAC to continue our constructive input and co-operation with WSIB and we look forward to continuing to work together on the experience rating consultation.

Respectfully Yours,

Fred Spiro,
Executive Director,
Employers' Advocacy Council