



June 8, 2015

Elizabeth Witmer, Chair
Workplace Safety and Insurance Board (WSIB)
200 Front Street West
Toronto, Ontario
M5V 3J1

Dear Ms. Witmer:

RE: WSIB RATE FRAMEWORK REFORM - STAKEHOLDER CONSULTATION

The Northern Ontario Service Deliverers Association (NOSDA) represents ten District Social Services Administration Boards (DSSABs) across Northern Ontario as well as one Consolidated Municipal Service Manager – the City of Greater Sudbury. These DSSABs and the CMSM are mandated to deliver Social Services such as Ontario Works, Children’s Services and Social Housing Programs. Additionally, several, but not all of the DSSABs deliver Land Ambulance Services, which in most cases represents just over 50% of the workers in those DSSABs.

Currently DSSABs may have several different WSIB rates within their worker complement that represents the risk of injury and the cost of claims within that employment category:

- i.e. Local Government Services group 845 with a premium of \$2.88;
- Janitorial group 923 with a premium of \$3.73;
- Apartment and Condominium Services group 905, with a premium \$3.04; and
- Ambulance Services group 590, with a premium of \$6.46.

Should the suggested recommendation move forward proposing that the highest rate group apply to an organization or that a mixed rate group be established, DSSABs would be affected dramatically. Our premium costs in most cases could potentially double, placing an undue hardship on our local municipalities and our local taxpayers to cover the associated increased costs.



Within municipal government systems, it is anticipated that only the northern DSSABs would see this extreme rate change. Given our mix of provincially mandated employment we would be paying the highest premium for our entire organization. Similarly, single tier municipalities and regional government which normally have a larger number of employees in lower rate groups would see a decrease in premiums as their organizations would have the lower rate established for their entire organization.

Should this rate proposal be adopted we anticipate that it may, in some cases, lead to a fracturing of the delivery model that has evolved over considerable time and with considerable effort here in the north. DSSABs may have to consider creating separate incorporated companies to represent the highest rate group and limit the exposure to the rest of their organizations leading to inefficiencies and a loss of economies of scale just to manage WSIB costs.

It is the position of the DSSABs that the current rate structure based on a premium for a specific category of workers within an organization be maintained. Premiums represent both the risk of injury to the worker and cost of claims within the category. This process for the most part is fair and equitable to all employers and will not incur significant premium changes for any of employer.

Sincerely,

Iain Angus, Chair

cc: Hon. Kevin Flynn, Minister of Labour
Hon. Helen Jacek, Minister of Community and Social Services
Hon. Ted McMeekin, Minister of Municipal Affairs and Housing
Hon. Liz Sandals, Minister of Education
Hon. Tracy MacCharles, Minister of Children and Youth Services

Gary MacNamara, President, Association of Municipalities of Ontario (AMO)
Alan Spacek, President, Federation of Northern Ontario Municipalities (FONOM)
David Canfield, President, Northwestern Ontario Municipal Association (NOMA)
Norm Gale, President, Ontario Association of Paramedic Chiefs (OAPC)
Michael Zacks, (Acting) Director and General Counsel, Office of the Employer Advisor