

July 18, 2019

Janet Patterson, Reviewer  
Workers' Compensation System Review  
PO BOX 97122 Stn Main  
Richmond, B.C. V6X 8H3

Via email: [Info@wcbreview.ca](mailto:Info@wcbreview.ca)

Dear Ms. Patterson:

**Re: Employer's Forum Submission to Workers' Compensation System Review**

Coast Mountain Bus Company is formally endorsing the "Employer Community Submission to the Workers' Compensation System Review", submitted on or about July 19, 2019, in response to your review of the BC Workers' Compensation System Review as set out in the Terms of Reference dated March 4, 2019 signed by Hon. Harry Bains, Minister of Labour.

Coast Mountain Bus Company (CMBC) has the following specific concerns we would like considered as part of the review:

- CMBC has experienced an increase in the acceptance of mental health claims where objective evidence for the claim exists but is not considered. Rather, only the subjective evidence of the employee is considered. This practice has resulted in a 30% increase in mental health claims in 2019 (year to date) over 2018. This practice is not sustainable from the employer's perspective.
- CMBC has noted a significant difference in the management of mental health injuries as opposed to the management of physical injuries. For physical injuries, treatment for workers is offered immediately. For mental health injuries, treatment is only offered after the claim is accepted. This represents a significant delay between an incident occurring and the provision of mental health support and treatment to workers. Delays, frequently in the order of 4 week (due to adjudication time period) result in workers not receiving the support needed for full recovery. This negatively impacts workers in the long term.
- CMBC is concerned about lack of support (for employers) from WorkSafeBC when suitable offers of meaningful modified duties are offered to employees on WorkSafeBC claims. Employers reasonably following section 34.11 and related Practice Directive expect WorkSafeBC to act when workers decline alternate/modified duties. WorkSafeBC's failure to address such employees negatively impacts both employers (as it limits worker availability and lengthens claims) and workers (since they do not benefit from the proven RTW recovery process).

Yours truly,

Derek Stewart  
Director, Safety, Environment and Emergency Management  
Coast Mountain Bus Company