



July 23, 2019

WCB Review 2019
Attn: Donna Hanson, Review Coordinator
PO Box 97122 Stn Main
Richmond, B.C. V6X 8H3

Ms. Janet Patterson
Reviewer
Workers Compensation System Review

By email: info@wcbreview.ca

Dear Ms. Patterson,

Established in 1977, the BC Care Providers Association (BCCPA) is the leading voice for B.C.'s continuing care sector. Our growing membership base includes over 340 long-term care, assisted living, home care, home support, independent living, and commercial members from across British Columbia.

We are writing you today to affirm our endorsement of the Employer Community Submission to the Workers' Compensation System Review submitted to you on July 19th.

We do, however, make this endorsement by putting on the record some minor differences in our organization's overall approach to return-to-work provisions in the Employer Community Submission. These are:

1. BCCPA notes that a successful return-to-work process is timely, collaborative, and worker-centric. Successful return-to-work programs produce the best outcomes for workers and employers alike;
2. Similar to the Employer Community Submission, BCCPA does not recommend or endorse that the duty to accommodate should be included in the Workers Compensation Act. However, if the duty to accommodate is to be included in the Act, BCCPA would recommend that the roles and responsibilities of employers, unions, and workers be therefore written into the Act, thus ensuring the good-faith participation of all parties;



3. BCCPA also notes that communication delays between Board Officers and Employers can impede the creation of return-to-work plans, thus delaying the recovery of the worker. BCCPA believes that secure technological solutions should be sought (such as a secure employer portal) for information exchange rather than phone or email.

It is our firm belief that we all have a duty to participate in good faith when it comes to having a worker return to work, and those responsibilities should be clear under the Act. When done properly, returning to work can be the best way forward for both the employer and the individual worker.

Ideally, employers should find collaborative ways to help injured workers in order to facilitate a successful return or recovery at work. It should not be about taking punitive measures.

Thank you for your consideration of our points included in this letter, and of the Employers Community Submission of the Workers Compensation System Review of which we are a co-signatory.

Sincere regards,

A handwritten signature in black ink, appearing to read "Daniel Fontaine", is positioned above the typed name.

Daniel Fontaine
CEO
BC Care Providers Association