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Elizabeth Witmer  
Chair – WSIB  
200 Front Street W  
Toronto, ON M5V 3J1

September 2, 2015

Dear Ms Witmer,

We are writing to express concern over the way in which the Workplace Safety and Insurance Board is presenting the Institute for Work and Health's (IWH) "Final Report on Work Injury and Poverty: Investigating Prevalence across Programs and Over Time."

It is our feeling that the study is being inaccurately used by the Board to downplay the impact of poverty on workers with permanent disabilities. A headline relating to the article is prominently displayed on the front page of WSIB's website, and the linked summary proudly proclaims that "there is no consistent difference in the prevalence of poverty between permanently impaired injured workers and able bodied workers." While this would certainly be welcome news to ONIWG, it is simply not reflected in the data or analysis contained in the IWH report.

Setting aside the absurdity of comparing multiple groups of people living at unacceptable levels of poverty and declaring it a victory, there are several ways in which the Board's characterization of the study is either inaccurate or disingenuous.

Contrary to the Board's statement that injured workers are only as poor as their able bodied counterparts, the study notes that the differences in the rates of poverty for permanently impaired workers widens over time in several ways. Firstly, injured workers experience higher levels of poverty than their uninjured equivalents under the FEL/NEL system than the previous pension system, and even higher levels under the current LOE system (noted throughout pages 36-48,

55-56). Secondly, the study notes that injured worker poverty levels increase as the time post-injury increases (noted on page 6, 37, 40, 43, 49, and 55).

Further, it is important to note that the Longitudinal Administrative Database that the study draws on uses data only from tax filers. About 5% of Canadians don't file taxes (as noted on page 23), and very low income people – including injured workers – almost certainly make up the vast majority of this group, weighting the sample heavily towards higher income reporting.

Finally, the study only uses data for workers that were injured up to 1998 and not beyond. Given the significant changes within the WSIB in recent years, we do not believe this report accurately reflects the experiences of injured workers today. The current Board should not be using data this old to put a positive spin on present practices.

For all of the above reasons, we feel that it is inappropriate for the WSIB to be presenting this report as evidence that its poverty prevention mechanisms are adequate. This is especially insulting given the fact that another recent study found injured worker poverty levels to be as high as 26%, as compared to 14% in the general population (Ballantyne et. al., Critical Public Health, March 2015). It is unacceptable to put a positive spin on a report which explicitly states that British Columbia is doing a better job of keeping injured workers out of poverty than any of Ontario's three historic compensation models (noted on pages 6, 71, 75).

The Board should immediately cease using this study to give the impression that injured worker poverty is not a serious concern, and commit to a plan that addresses – rather than downplays – the devastating financial effects of permanent impairments.

Sincerely,

Eugene Lefrancois, President

cc - ONIWG  
- David Marshall, CEO WSIB  
- Kathleen Wynne, Premier  
- Kevin Flynn, Minister of Labour  
- Peri Ballentyne  
- Opposition critics