



April 29, 2008

Extension of Coverage Consultation  
Workers Compensation Board  
333 Broadway  
Winnipeg, Manitoba R3C 4W3

Dear Sirs:

We are pleased to take this opportunity to provide comments with respect to the document “**CONSULTATION: Extending Workers Compensation Coverage**”.

It is our understanding that the existing Workers Compensation (“WCB”) system provides for compulsory participation by certain industries, while participation is voluntary for others. Currently, accounting and financial services appear to fall within the voluntary category.

The consultation document deals with the extension of WCB on a compulsory basis to a large number of industries that are currently excluded. It appears that consideration is being given to including the accounting/financial services sector as a compulsory participant.

We support the need to protect workers and ensure that they have access to wage-loss replacement, counselling, therapy, return-to-work programs and all of the other benefits that WCB provides. However, we note that these benefits are currently available in the insurance market as well as from WCB on a voluntary participation basis.

A large number of employers in our “industry” (profession) already offer such benefits and some offer even more (gym memberships, daycare, flexible health benefit plans). The market has dictated such benefits as the norm in order to attract and retain skilled professionals in our field. A survey conducted by the Canadian Institute of Chartered Accountants in 2007 reported that at least three-quarters or more Chartered Accountants in Manitoba had employment benefits that included medical, dental, life insurance and long-term disability programs as base benefits, with many employers offering additional work-life balance and wellness benefits. Once such benefits have been incorporated into compensation packages, it is extremely unlikely that they will disappear.

In part to answer the needs of the members of our profession and their employees, the CA profession in Western Canada has developed a very successful profession-owned life, disability and health benefits program. These benefits are available to both employers/employees and individual members of our profession on a voluntary basis. Accordingly, our profession currently has access to benefit packages from a number of providers, including the profession-owned provider and WCB, as only two of many options.

Within our profession, there are many professional accountants who work as sole practitioners or in very small partnerships and our profession-owned program provides important and flexible coverage for them. It allows them to make their own decisions as to what level and type of coverage they need. Forcing them into a compulsory “cookie-cutter” program would likely not serve them as well. In addition, we make coverage available to retired members. We recognize that the mandate of WCB does not extend to retirees, however, imposing compulsory participation in WCB on the profession would impact the profession-owned program.

This in turn would limit the ability of this growing number of retired members to access cost-effective coverage that is appropriate for their needs.

We also believe that the opportunity to make choices from several providers is an important factor in ensuring that benefits are flexible and competitive from a both a service and cost perspective. Extending compulsory participation in WCB effectively creates a monopoly. The profession appears to have shown a preference for choice rather than opting to participate in WCB. Forcing participation in WCB removes the ability to make flexible choices based on specific needs.

We have contacted our sister organizations across the country and we understand that a number of provinces continue to permit voluntary participation in the their WCB programs for our profession. This is likely due at least in part to the fact that workers in the accounting/financial services sector are at a low risk for workplace injuries. We recognize that there may be some exposure to repetitive strain injuries. However, we believe that the combination of benefit products that are available together with the labour market demand for such benefits and the current flexibility in providing tailored benefit plans has produced a system that provides excellent protection for our profession.

It is worthy of note that, based on our discussion with representatives of the profession-owned program, in the roughly 25 years that the program has been in existence, there have been only a handful of claims that are directly related to workplace injuries. The vast majority of the claims relate to non-workplace injury or disease.

In closing, we agree that there are very likely some industries where there may be good reasons to extend compulsory WCB. However, we do not believe there is a compelling case to do so in the case of the accounting/financial services sector, or more specifically, as related to professional accountants. Professional accountants have the skills to evaluate compensation and risk and make informed decisions about their own needs. They can negotiate the coverages and benefits that are most meaningful and appropriate for their circumstances with careful analysis of the costs and benefits of various alternatives. A compulsory WCB system removes the opportunity to benefit from that analysis and flexibility.

We do not believe that compulsory participation in WCB is likely to provide enhanced protection or benefits for professional accountants and may in fact downgrade existing benefits that are currently available to some of them.

However, we are supportive of and would participate in an initiative to provide professional accountants with more information on the opportunity for voluntary participation in WCB as one of the benefit plan options that is available to them as employers.

We hope that our comments are helpful to you as you prepare your report to the Manitoba Government. If you have any questions, please do not hesitate to contact me.

Yours truly,



Gary B. Hannaford, FCA  
Chief Executive Officer