



# Recommendations for ADP Pursuant to Auditor General's 2018 Report

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The Auditor General's report on the Assistive Devices Program makes 10 recommendations. The Canadian Assistive Devices Association is supportive of all the recommendations and we would like to focus on two of them in this document, as these are key to achieving three high-level priorities identified by the PC Caucus. These priorities are:

1. Reduce red tape
2. Manage government costs
3. Govern "for the people"

Recommendations 8 and 9 of the Report focus on improving the operational efficiency of the program and improving claim processing time. These recommendations suggest the use of an electronic online claim application and invoicing system, and a streamlined process. We strongly support this, and we request the opportunity to provide input to the development of this system.

An industry survey of approximately 16,000 applications over a six-month period in 2018 found that the average time frame for approval of the applications averaged four months with the range from 9 weeks to 7 ½ months. A summary of the survey results is attached.

***This is causing hardship for vulnerable Ontarians and it can be fixed.***

We have four simple suggestions to address the Auditor General's recommendations:

1. Allow the Ministry to accept electronic signatures.
2. Streamline the adjudication process.
3. Provide clear communication on the reason and remedy for rejected claims.
4. Provide transparency to the industry on the status of claims, and on volume and processing times.

### **Electronic Signatures**

This is a necessary first step for an electronic system. The precedent is already clearly established in the current use of electronic signatures for other Ministry transactions. We urge the Ministry to provide ADP with the funding and the appropriate approvals from senior government officials to implement this as soon as possible.

### **Adjudication Process**

There are several types of claims that could be fast-tracked. They do not require the level of adjudication necessary for other, more complex claims.

Complex applications should also be adjudicated more promptly through this streamlined submission process and supported by consistent audit practices. This will save government resources and reduce fulfillment time for end-users.

### **Communication on Rejected Claims**

Based on our members' experience, the vast majority of claims are eventually approved, but the process of identifying the cause for initial rejection and remedying it is intensely and unnecessarily time-consuming. The cost is thousands of hours of government resources in re-processing claims, and lengthy delays in getting much needed devices to end-users.

If the system provides clear and timely communication on the cause and remedy for rejected claims, this will reduce turnaround time substantially and liberate government resources. These resources could be redirected to audit and verification activities, and to the reporting activities recommended in the Report.

Assistive devices vendors in Ontario are primarily small businesses, with limited resources. A reduction in the red tape will enable them to focus more effectively on serving their clients. A simplified flow chart of their service activity is attached.

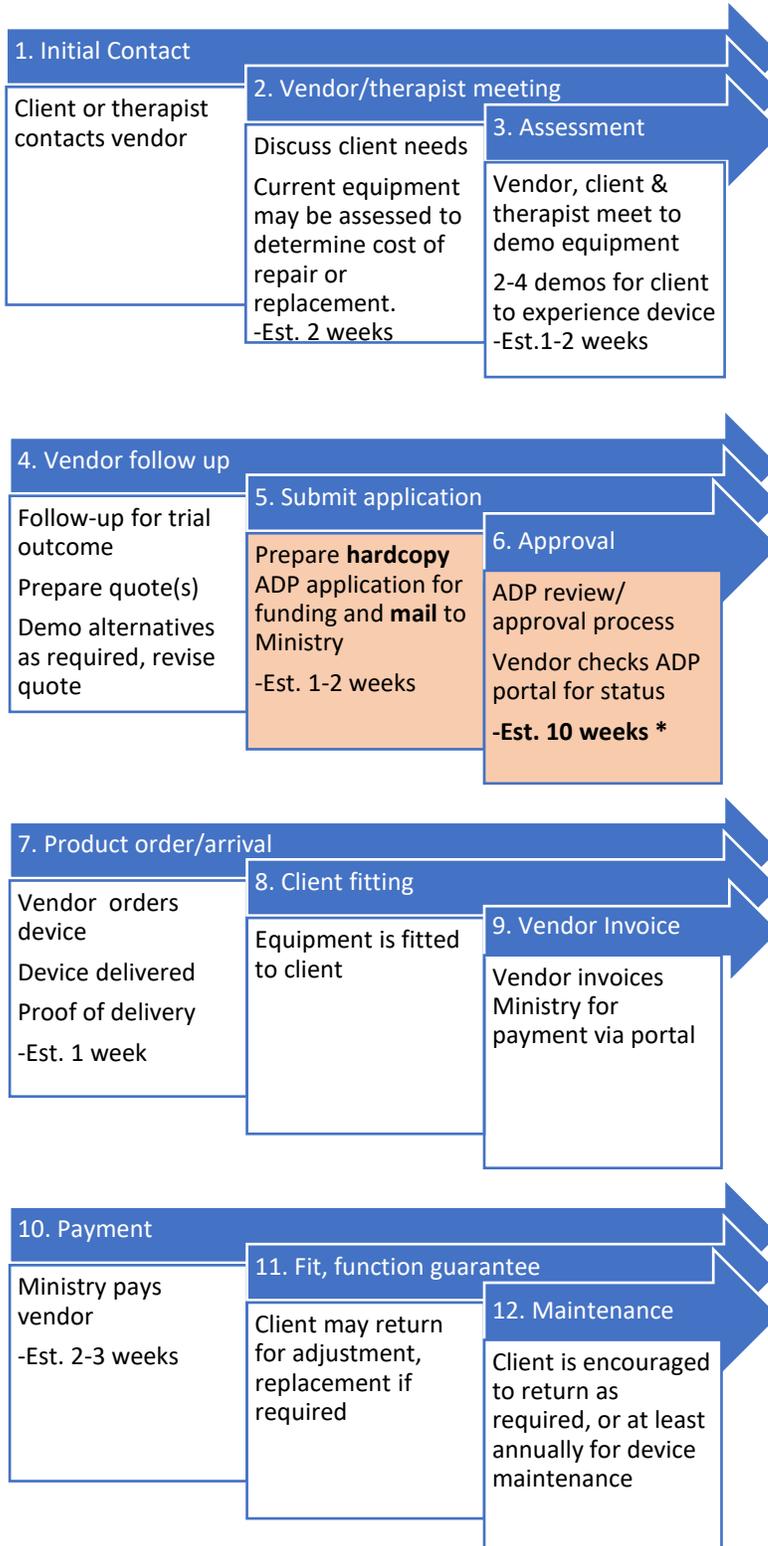
### **Transparency**

At present it is difficult and often impossible for authorizers and our members to determine the status of a claim. Claims are manually submitted to ADP. This is stressful and frustrating for the clients, and the authorizers and vendors who are trying to provide a high level of expedited service to clients in need; vulnerable and at-risk Ontarians.

If the system provides timely, online, access to the status of all outstanding claims, the industry can better serve our end-users and eliminate repetitive, routine requests for information from ADP. This will save government resources, allowing them to be redirected to higher-level and more productive activities.

In terms of data transparency, ADP already tracks volume of applications and processing times, but ADP staff do not have authorization to share this information with the industry. If the system provides for the sharing of this information, we can better work together to improve efficiency.

Vendor-Client-ADP Process



**Process Challenges**

- Hardcopy more time-consuming and prone to errors/omissions than electronic form
- Mail is slow
- Many applications do not appear on the portal
- If application is not approved, vendor starts again with limited information

\*Approval can take much longer than 10 weeks

## Canadian Assistive Devices Member Survey Results: ADP Processing Time

Earlier this year the Canadian Assistive Devices Association conducted a survey of its Ontario members regarding their application processing experience with ADP (Assistive Devices Program). This data represents the results from 43 respondents submitting approximately 16,000 applications over a six-month period ending September 30, 2018.

Summary:

- The average time frame for approval of the applications averaged four months with the range from 9 weeks to 7 ½ months.
- The rejection rate averaged 10%.

Below are some typical comments:

- *"...Historically we have been able to depend on the consistency of the program in order to reasonably assess the likelihood that a (client) will be funded. ...(Now) more applications are simply never being approved – even after multiple appeals by the authorizer and without a clear rationale as to why the client is not being approved...Therapists are being rejected at more than double the rate historically associated with the program. In over 70% of the cases, ADP is not providing ...(the) reason for the rejection... We can not possibly know in advance and advise (clients), and we have no way of knowing why they have ultimately been rejected."*
- *"Delays (could) be easily avoided if those going over the application were properly trained. Many application delays are due to inaccurate approvals/declines. Oftentimes we are given approvals with missing codes...and waiting an additional 8 weeks plus for...(reapproval) with all required codes."*
- *"Like many companies we are no longer supplying equipment at no charge between the assessment date and approval date which is causing more financial harm for clients with limited finances..."*

The challenge for the industry, for the end-users and for ADP, is that the approval process is unnecessarily laborious for all parties. As we noted in our recommendation earlier, we have four simple suggestions to address the challenge:

1. Allow the Ministry to accept electronic signatures.
2. Streamline the adjudication process.
3. Provide clear communication on the reason and remedy for rejected claims.
4. Provide transparency to the industry on the status of claims, and on volume and processing times.

We request the opportunity to provide input to the development of this system.