

Submission to The Workers Compensation Act Legislative Review Committee 2016

Small business priorities for a sustainable WCB system

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Introduction

Background on CFIB

The Canadian Federation of Independent Business (CFIB) is pleased to provide this submission to *The Workers Compensation Act* Legislative Review Committee 2016. CFIB has participated in workers' compensation reviews in the past and welcomes the opportunity to provide our members' views.

CFIB is a non-partisan, non-profit, political action organization with membership comprised of over 109,000 small- and medium-sized enterprises (SMEs) across Canada. Approximately 4,800 of our members are based in Manitoba, located in every region of the province, and with diversity in activity that closely parallels that of the province's economy.

CFIB's presentation to *The Workers Compensation Act* Legislative Review Committee 2016 will cover our members' views and concerns of the Workers Compensation Board of Manitoba and offer, in broad outline, what we believe are solutions. CFIB is pleased to share the results of a special WCB survey, which was emailed to 4,800 Manitoba members between March 5 and May 14, 2015. The fact that 467 members took the time to respond to the survey reveals the significant urgency SMEs place on this issue.

One of CFIB's greatest strengths is our ability to survey our members and provide this information to policy makers in a timely fashion through a "One Member - One Vote" system. In preparation for *The Workers Compensation Act* Legislative Review Committee 2016, CFIB has used a wealth of survey data, including results/data from:

- ▶ CFIB's *Special WCB survey* (March 6 - May 14, 2015) - in developing our recommendations for our submission, CFIB conducted an email survey of Manitoba small business members with 467 responses
- ▶ CFIB's annual provincial surveys on various business issues such as tax and WCB policy - average 350 responses in Manitoba, once per year
- ▶ CFIB's *Our Members' Opinions* survey - an in-person interview-based survey of members, averaging over 700 responses in Manitoba, twice per year

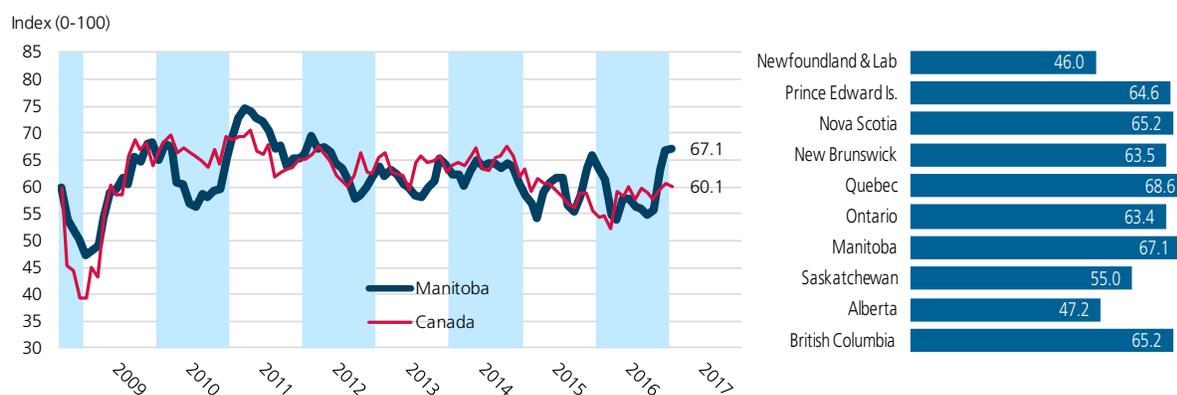
CFIB Monthly Business Barometer® – A look ahead for 2017

CFIB's Monthly Business Barometer® has shown to be an extremely accurate indicator of economic growth and is utilized by a number of financial institutions in Canada including Bloomberg, the Bank of Canada and Scotiabank. Tracked against GDP, the Barometer index closely reflects what is currently happening in the economy. Measured on a scale between 0 and 100, an index level above 50 means owners expecting their businesses' performance to be stronger in the next year outnumber those expecting weaker performance.

The Manitoba January 2017 Monthly Business Barometer® revealed optimism among small business owners increased again to 67.1, up from 55.6 in October 2016 (see Figure 1). However, hiring intentions and the state of business health indicators have continued to lag over this time.

Figure 1:

CFIB Monthly Business Barometer Index (Manitoba vs. Canada) (% anticipating stronger performance)



Source: CFIB Manitoba Business Barometer®, January 2017.

Governments can either fuel or dampen optimism by the policies they introduce. We need to be mindful of *The Workers Compensation Act Legislative Review Committee 2016's* recommendations and the long-term financial impact on the Board, and as importantly, the impact on Manitoba's employers who fund 100 per cent of the cost of WCB. The full impact of *The Workers Compensation Act Legislative Review Committee 2016* must be properly assessed before legislative changes are imposed. It is CFIB's hope the Committee will not recommend costly legislative changes to the WCB system, which could essentially undo the progress made to date.

The small business perspective of WCB

Impact of WCB payroll taxes on small business job creation

One important, but generally forgotten reality, is that WCB premiums are a tax on payroll that must be remitted to the provincial board, regardless of an employer's profitability or financial standing.

Workers' compensation systems are also very complex. Not surprisingly, Manitoba business owners point to workers' compensation and occupational health and safety requirements as the second most burdensome area of provincial/territorial regulations (see Figure 2).

CFIB supports a compensation system that is responsive to injured workers and accountable to employers, but also respectful of the time and cost to employers. Workplace safety and insurance are priorities for small

businesses, so it is critical they are operating efficiently; this includes keeping paperwork manageable and costs reasonable for employers.

Figure 2:

Which provincial government regulations are the most burdensome in terms of how much time you and your staff spent on compliance in the past 12 months? (Select as many as apply, % response)



Source: CFIB, 2017-18 Manitoba Budget Survey, November 2016, n=285.

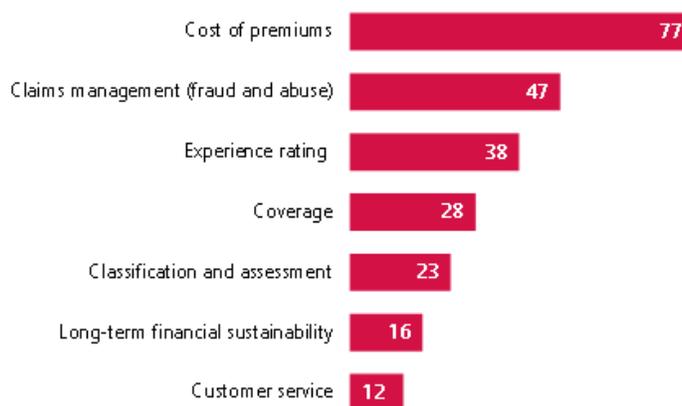
Top WCB priorities

In order to further explore the issues that specifically concern our members regarding workers' compensation, CFIB asked our members "What should be the top priorities for CFIB action regarding your WCB?" (see Figure 3). The top concerns identified by members are:

- ▶ **Costs of premiums (77 per cent)**
- ▶ **Claims management (47 per cent)**
- ▶ **Experience rating (38 per cent)**
- ▶ **Coverage (28 per cent)**
- ▶ **Classification & assessment (23 per cent)**
- ▶ **Long-term financial sustainability (16 per cent)**
- ▶ **Customer service (12 per cent)**

Figure 3:

Which should be the top priorities for CFIB action regarding your WCB? (% response)



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

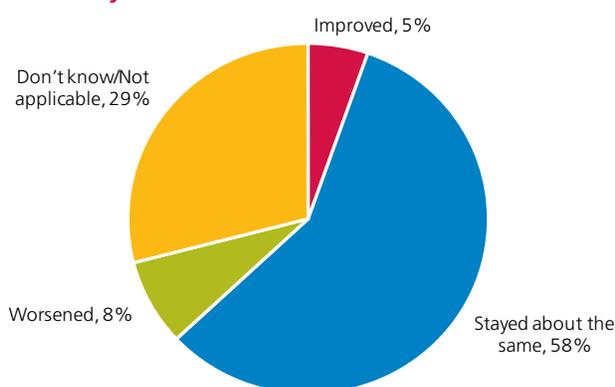
While progress at the Board has been made over the years – including recent changes, CFIB believes further improvements to WCB can and should be made. *The Workers Compensation Act* Legislative Review Committee 2016 has the opportunity to recommend important reforms to ensure Manitoba has a sustainable and affordable WCB in the coming years.

Small business grades the WCB

CFIB asked its Manitoba members to grade the performance of the WCB on how the overall service received from the Board has changed during the past three years and found 58 per cent of Manitoba respondents said it is the same. Only five per cent said it had improved and another eight per cent said it had gotten worse (see Figure 4).

Figure 4:

How has the overall service you received from your WCB changed during the past three years?



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

The fact that only five per cent of Manitoba employers said the overall service is better than three years ago provides an opportunity for *The Workers Compensation Act* Legislative Review Committee 2016 to address some key concerns. CFIB acknowledges that WCB has made significant strategic investments in personnel and infrastructure, however it is essential that these investments not only reduce injuries and rates, but also help improve customer service.

Small business takes safety very seriously

In meeting with numerous small business owners throughout the province, it is clear that safety and a safe work environment are primary concerns. Business owners realize the people they employ are their most valuable resource, and that a safe employee is also a productive employee. Unfortunately, there are some in society who characterize business owners as individuals that do not care about the safety of their employees, and this could not be further from the truth.

Responsibility for safety

CFIB members believe they, as employers, play a critical role in safety – in fact the most important role. Therefore, it is incumbent upon government to ensure employers' voices are heard in discussing these important issues. In order to improve safety, employers must “buy into” the government's approach, and view it as viable and workable. It is also important to place a balanced emphasis on the workers' responsibility for safety. Employers feel that, together, they and their employees play key roles in safety and reducing accidents. This spirit must be embraced and translated into a workplace safety culture where the two parties involved play essential roles. Safety cultures cannot be fostered in “command and control” regulatory approaches to workplace safety.

Fundamental principles for WCB reform

It should be noted that CFIB and other employer organizations all share a fundamental vision of reform based on insurance principles. The Manitoba WCB is a monopoly, no fault disability insurance corporation that provides collective liability, amortizes costs over a longer period, and helps to ensure some stability in the event of unforeseen circumstances. The CFIB still accepts the historical trade-off first established by the 1914 Meredith Commission in Ontario, which established a model system later adopted throughout all jurisdictions in Canada, including Manitoba in 1916.

Employers have accepted responsibility for full payment of WCB costs in lieu of avoiding costly litigation through the courts. In accepting this trade-off (even though relief from litigation is equally beneficial to avoid liable suits among workers), employers do not want to see the strategic shift of WCB systems toward a more universalistic view that evolves into other forms of social welfare assistance. The historical Meredith principles never encompassed a universal disability insurance program, or a program of unlimited vocational education. Instead, we urge *The Workers Compensation Act Legislative Review Committee 2016* to support the following fundamental principles:

1. Workers' compensation should insure workers only against injuries caused by work;
2. Workers' compensation should be administered to serve workers and employers efficiently and effectively;
3. The system should guarantee a fair, affordable level of compensation to permanently disabled workers today and in the future;
4. The system should include incentives and programs that encourage timely return to suitable work;
5. No worker should receive a higher net income on compensation than he/she would from working;
6. All employers benefiting from a collective liability scheme should pay their fair share of its costs;
7. The system should be based on prevention first, return to work if possible, rehabilitation when needed, and appropriate compensation where necessary;
8. The system should be fully funded over a reasonable timeframe - increased assessment charges to fund large accumulated debts diverts revenues that should be fully allocated to quality services to injured workers and the most competitive rates possible; and
9. The system should be designed and managed to avoid volatility in managing employer premium costs.

Boards and governments need to re-establish the connection between WCB and workplace accident insurance. At the end of the day, re-establishing WCB as an insurance premium helps workers every bit as much as it helps employers. If firms can see some link between their accident record and the premiums they pay, they will have more of a direct incentive to put in place strategies to reduce the number and severity of accidents in the workplace.

Financial Accountability

We recognize the importance of every Board being fiscally sustainable in the long-term. A fully-funded workers' compensation system is necessary for ensuring that the financial obligations associated with payment of current and future workers' benefits are met. However, this does not mean the Board should be overly cautious or hold onto employers' money, when it should be fully rebated.

To evaluate how well Workers' Compensation Boards across Canada do at achieving this equilibrium, it is reasonable to look at how well-funded each board is by comparing total assets and total liabilities. CFIB

believes a ratio of assets to liabilities between 100 per cent and 110 per cent is reasonable since it is unrealistic to expect a system to consistently have a perfect 100 per cent funding ratio.

Additionally, a ratio that falls between these targets allows for enough financial resources to pay for workers' benefits against unexpected events, while providing more accurate assessments to employers.

An underfunding problem is easier to understand. A Workers' Compensation Board that can't pay its bills puts workers' insurance at risk and suggests structural problems that need to be addressed.

An overfunding problem is troubling for different reasons. When a Board consistently takes more money than it needs from employers, it is simply unfair. It means employers have less than they should to invest in their businesses, which could mean new and safer equipment, pay increases to help retain valued employees or improving customer service.

The Board in Quebec is the only board that is funded within the ideal range. In CFIB's 2011 Ranking, the Quebec Board was in an underfunded position at 73.6 per cent (see Figure 5). To return to a fully funded position, the Board approved new arrangements for their funding policy. Under these new arrangements, the Quebec Board was able to not only decrease premiums but also return to a fully funded position. Further, the Quebec Board recently adopted a policy establishing a funding range of 100 per cent to 110 per cent, which is CFIB's ideal range.

As the Committee is probably aware, both the Alberta and Saskatchewan Boards have found themselves in a massively over-funded position in the past few years, and each have been pushed by small business to refund the extra money. In fact, Alberta businesses have received rebates amounting to over a billion dollars in the past two years, thanks, in part, to some not-so-gentle nudges from small business. Alberta's Workers' Compensation Board, even through the latest recession, continued to be over-funded in excess of 130 per cent.

The Saskatchewan Workers' Compensation Board has rebated its \$141 million operating surplus to employers in 2015 and its \$281 million operating surplus to employers in 2016. That is why CFIB recommended the Saskatchewan Board immediately rebate the surplus in the year it is realized and not distribute it over a 5 year period. Furthermore, it should change the current funding percentage of 105 per cent to 120 per cent to a funding ratio between 100 per cent and 110 per cent.

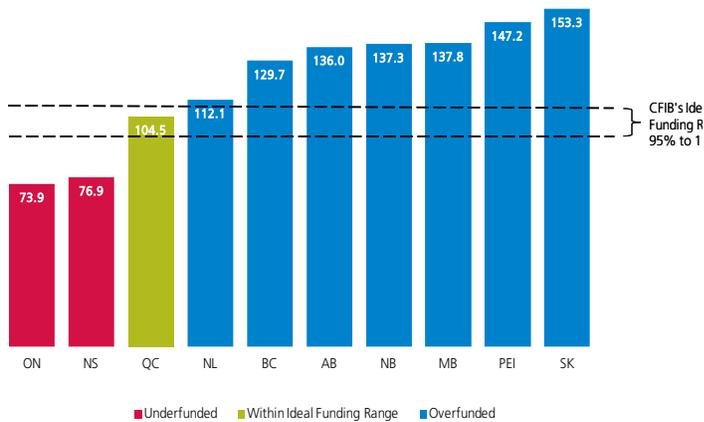
Current funding position:

2015 Funding Position: CFIB's current analysis found that WCB of Manitoba was funded at 143 per cent in 2015. This is much higher than CFIB's recommended target of 100 to 110 per cent. Furthermore, it is higher than the Board's current target of 130 per cent. This funding position results in a surplus of \$173 million for 2015.

In conversation with Manitoba's WCB President and CEO, it was evident that WCB's current over-funded position would drive long-term rate decreases, instead of refunding the overpayments to Manitoba employers. While CFIB members appreciate the need for stable and predictable rates, and (CFIB) commended WCB when the 2017 rate decrease was announced, it must be noted that the desire for rate stability does not supersede the right for employers to receive back their excess premiums paid.

Figure 5:

Funding position* of workers' compensation boards, by province, 2014 (in %)



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

overfunded. According to CFIB's Mandate 264 survey conducted last September, 90 per cent of Manitoba small business owners agree that WCB should be required to rebate surplus funds to employers when the board exceeds its targeted funding position. Only three per cent of respondents disagreed with the statement; concerned that it could lead to higher premiums and an inability to pay out compensation during economic downturns (see Figure 6).

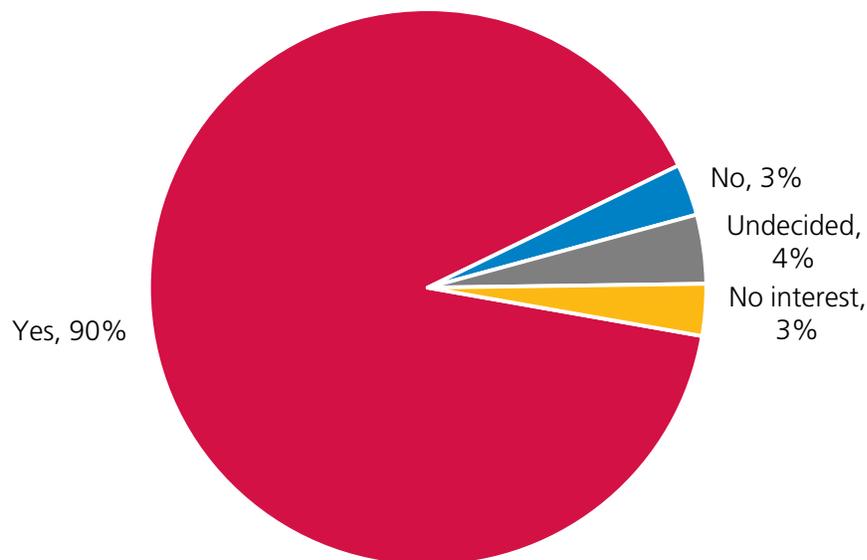
It is important to realize that collecting excess premiums to fund future rate decreases, is no net benefit to entrepreneurs. Business owners have every right to control their own money and decide how to best invest it.

Responding to small business concerns, CFIB launched a petition urging Manitoba's WCB to fix its current refund policy. Over 690 employers have signed the petition since August, 2016; calling for the Board to directly refund excess funds back to Manitoba employers.

Further to receiving hundreds of WCB petitions, CFIB also received compelling evidence that clearly shows that the vast majority of small business owners strongly support receiving a rebate from WCB when

Figure 6:

Should the WCB of Manitoba be required to rebate surplus funds to employers when the Board exceeds its targeted funding position?



Source: CFIB Mandate 264, September 2016, Manitoba results, n = 341.

Changes required to WCB's Funding Strategy:

The WCB of Manitoba's Funding Policy includes a target level for the Accident Fund Reserve. The target level for the Accident Fund Reserve is calculated based on a targeted funding ratio of 130 per cent. A formula is then used to calculate the Accident Fund Reserve Target in dollars (Workers Compensation Board of Manitoba Policy & Procedures Manual, Section 30, Policy 31.05).

The policy stipulates actions that the Board can take if the Accident Fund Reserve target level is achieved:

- i. Rebates;
- ii. Reductions in the average assessment rate
- iii. Increased benefits; or
- iv. Some combination of i. - iii; or
- v. No action, with further review in one year or less.

The Accident Fund Reserve balance was \$621 million at December 31, 2015, versus the target for the Fund of \$448 million (Workers Compensation Board of Manitoba Annual 2015 Annual Report, page 36, 40).

After reviewing the status of the 2015 Accident Fund Reserve, the Board of Directors approved the 2016-2020 Five Year Plan which includes a reduction in the average assessment rate which in turn will allow the WCB to reduce the accident fund reserve and funding ratio to meet the targets by 2020. The average assessment rate for 2017 is projected at \$1.10 (2016, \$1.25). However, when CFIB examined the 2015 annual report, it revealed the Manitoba WCB has been well-funded for a number of years with funding percentages of 143.3 in 2015, 137.8 in 2014, and 134.0 in 2013.

CFIB believes it's time to examine those funding targets so entrepreneurs can be assured the Board's financial position is sound, but not overly cautious. Our members believe being 130 per cent funded is being overfunded. **CFIB therefore recommends a funding ratio of between 100 per cent and 110 per cent as a fair scenario**, where the Board is able to fulfil its responsibility to protect present and future worker benefits against unexpected events and minimize the volatility of premiums.

Manitoba entrepreneurs want WCB to take a more reasonable approach such that a refund of surplus monies be triggered when the funded status rises above a threshold of 110 per cent. We also believe the surplus should be rebated in the year it is realized, similar to Alberta. This surplus distribution policy would give employers some of their own money back so they can focus on growing their business, creating jobs, and investing in new and safer equipment.

Recommendation: Change WCB's current targeted funding position of 130 per cent to a funding ratio (total assets over total liabilities) between 100 per cent and 110 per cent.

Recommendation: Rebate surplus monies when the funded status rises above a threshold of 110 per cent.

Recommendation: A surplus should be rebated in the year it is realized, similar to Alberta.

Prudent use of employers' premiums:

CFIB members have made it overwhelming clear that, as the sole contributors to the program, all WCB funding should be monitored closely and invested in the most prudent manner possible. Specifically, premiums and investments should only be used to fund WCB specific programming.

Recommendation: The Board must practice continued vigilance on administration costs.

Recommendation: WCB levies should be used solely to fund the compensation of injured claimants and not the bureaucracy within a government ministry. In many cases, Workplace Safety & Health programs duplicate those already provided by industry.

Recommendation: The significant investments into SAFE Work and other areas of WCB should be closely monitored and publically reported to ensure that small businesses are receiving a strong return on investment (ROI).

All recommendations should be thoroughly costed:

While the Manitoba WCB is financially stable, this should not be a signal that costly legislative changes are warranted.

Recommendation: All final recommendations of the Review Committee must be thoroughly costed to determine the long-term financial impact to the Board, and as importantly, the impact to Manitoba employers who pay 100 per cent of the cost of WCB.

Cost of Premiums

Workers' compensation premiums ranks as the highest priority for small business owners. It is understandable that the cost of premiums would be at the top of their list since payroll taxes have serious repercussions to sustaining a business. If premium rates are high, the payments made to the Board will constrain a business owners' ability to grow their business, increase their employee wages, create job opportunities, and invest in new and safer processes and equipment.

CFIB is pleased that WCB's new rate model in part recognizes that business size must be reflected in how premiums (and changes to premiums) are determined. However, there are still many outstanding concerns that employers have regarding classification, premium costs, and discount determinants, among others.

Frequency of lost time claims

A lost time claim is created when an employee suffers a work-related injury or disease which results in that employee being off work past the day of the accident, a loss of wages, and/or a permanent disability. The higher the frequency of lost time claims, the higher the cost to the workers' compensation system. In CFIB's review of various sectors (General Trucking, Machine shops, Restaurants, Landscaping, and General Stores) Ontario's board had the lowest frequency of lost time claims at 0.95 per cent. Manitoba's Board had the highest lost time claim frequency in Canada at 3.12 per cent (2015 Small Business Workers' Compensation Index). While Manitoba is taking steps to reduce the severity and frequency of claims, much more needs to be done to improve WCB of Manitoba's standing in this regard.

Recommendation: Improve the speed at which an injured worker is sent for diagnostic testing and referred to a specialist - with a goal of reducing wait times to zero.

Total annual percentage change of the average premium rate, 2006-2015

This indicator is intended to capture the overall trend in the average premium rate of each board during the past ten years (i.e. 2006 to 2015). During the past ten years, the board in New Brunswick achieved a reduction of 58.5 per cent in their average premium rate followed by Alberta's board with a 49.3 per cent reduction. Next was Manitoba's Board with a 26.7 per cent reduction and Saskatchewan at 24.2 per cent reduction in their average premium rate (2015 Small Business Workers' Compensation Index).

All boards except the Ontario and Nova Scotia boards experienced a reduction in their average premium rate during the past ten years. Nova Scotia's board showed the least amount of variation in average premium rate and exhibited an increase of 0.8 per cent. Ontario's board experienced the most pronounced increase at 9.5 per cent.

As mentioned earlier, CFIB is pleased the WCB of Manitoba recently proposed to reduce the average 2017 employer base premium rate \$1.10 (per \$100 of assessable payroll) from \$1.25 in 2016.

Claims Management

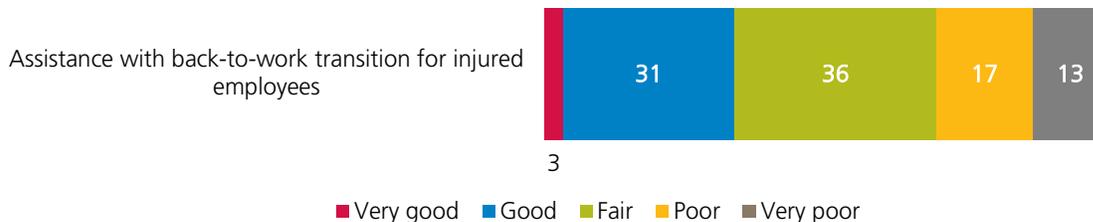
Business owners take as many steps as possible to ensure that their workplace is safe. In the event that an accident happens, employers must work with their boards regarding the many aspects of a claim and, depending on the circumstances, the processes to reinstate injured workers. This following examines the various steps involved in the claims management process.

Assistance with back-to-work transition for injured employees

Bringing an injured employee back into the workplace can be challenging to smaller employers. All boards provide assistance with back-to-work transition. However, the quality of this service varies from board to board. When asked how Manitoba small business members rated the WCB on assistance with back-to-work transition for injured workers, only three per cent of respondents said very good, 31 per cent said good, another 36 per cent said fair, 17 per cent said poor, and 13 per cent rated it very poor (see Figure 7). Clearly, progress must be made in this regard.

Figure 7:

How do you rate your WCB on assistance with back-to-work transition for injured employees? (% response)



Source: CFIB Workers' Compensation Survey 2015, March 5 – May 14, 2015, Manitoba respondents, n = 467.

Advice on promoting health and safety in my workplace

Promoting healthy and safe work practices is an important part of creating a safety-conscious work culture amongst both employees and employers. When asked how Manitoba business members rated the WCB on the advice on promoting health and safety in the workplace, only six per cent of respondents said very good, 35 per cent said good. However 59 per cent rated the Board as Fair/Poor (36 per cent fair, 14 per cent said poor, and nine very poor (see Figure 8). WCB has made a considerable investment creating SAFE Work, which should help improve these previous poor ratings. However, adding more staff will not simply ensure better results from the eyes of small business owners. WCB and SAFE Work must view their processes and policies through a small business lens; make sure that information is easy to understand and advice is accurate and straightforward.

Figure 8:

How do you rate your WCB on advice on promoting health and safety in my workplace? (% response)



Source: CFIB Workers' Compensation Survey 2015, March 5 – May 14, 2015, Manitoba respondents, n = 467.

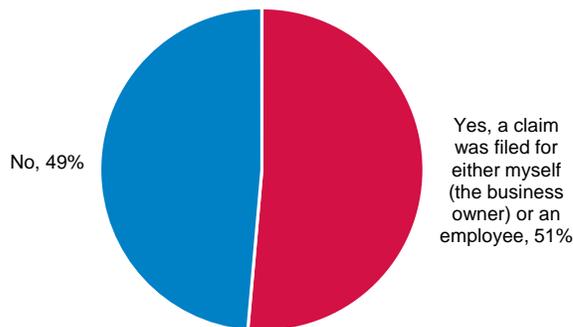
Recommendation: Ensure employee reinstatement and return-to-work provisions take into consideration the realities of running a small business.

Recommendation: Work more closely with small business owners to promote health and safety.

Involvement in the Claims process with WCB

Figure 9:

Have you been involved in a claims process with your WCB during the past three years?



Although they certainly hope they do not find themselves at this stage, many business owners must deal with their Boards when reporting a workplace accident or reinstating a worker. When asked if they had been involved in a claims process with their WCB during the past three years, 51 per cent of Manitoba respondents said yes and another 49 per cent said no (see Figure 9).

It is therefore vitally important employees are in fact getting back to work as quickly as possible and not lost in the WCB system due to lack of proactive case management. (Refer to CFIB Manitoba Member Comments 1).

Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

CFIB Manitoba Member Comments 1: Please describe your claims experience from your perspective (the business owner)

"To file a claim is easy, but to get answers from WCB is sometimes difficult." (Appendix A)

"Beneficial. Paid for employee's wages while off injured. Minimal amount of work required to file/process claim." (Appendix B)

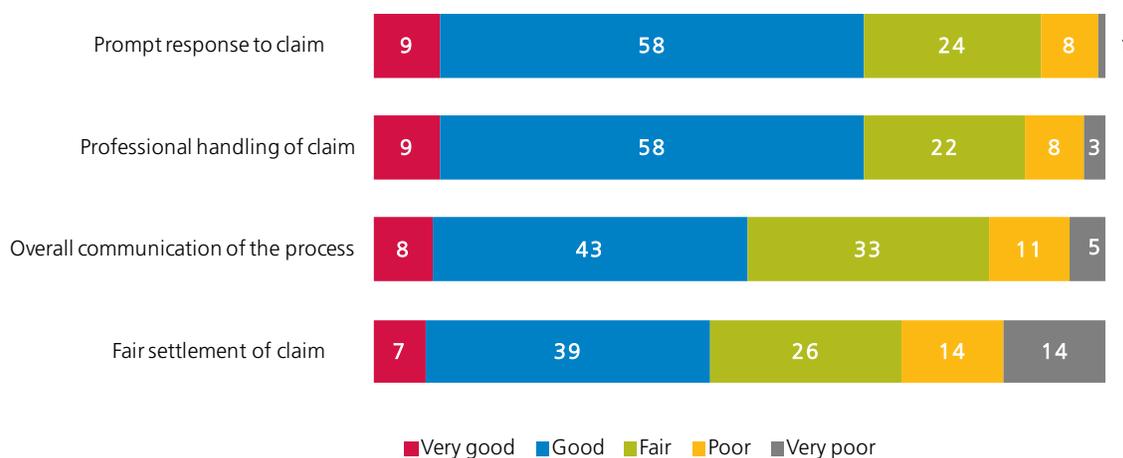
"Currently have an employee who is permanently unable to work..WCB is taking very long to process this claim." (Appendix B)

Overall rating of Claims process

CFIB survey results measure how small business owners evaluate several aspects of the initial claims process. Specifically, these are: professionalism of handling claims; promptness of responding to claims; fairness in settling claims; and overall communication of the process (see Figure 10).

Figure 10:

**How do you rate the initial claims process with your WCB on each of the following?
(% response)**



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

Promptness of responses to claim

Just nine per cent of CFIB members rated the promptness of replies from WCB as “very good”, although 58 per cent said it was “good.” A further 24 per cent cited this service quality measure as “fair.” Eight per cent rated promptness of responses as “poor” and just one per cent replied that it was “very poor” (see Figure 10).

Professional handling of claim

Nine per cent of CFIB members rated the professional handling of a claim as “very good”, while 58 per cent said it was “good.” A further 22 per cent cited this service quality measure as “fair.” Eight per cent rated promptness of responses as “poor” and just three per cent said it was “very poor” (see Figure 10).

Overall communication of the process

Only eight per cent of CFIB members rated the overall communication of the process as “very good,” although 43 per cent rated this service quality measure as “good.” A further 33 per cent cited this service quality measure as “fair.” Another 11 per cent rated overall communication of the process as “poor” and five per cent said that it was “very poor” (see Figure 10).

Fair settlement of claim

Only seven per cent of CFIB members rated the fair settlement of claim as “very good”, while 39 per cent said it was “good.” A further 26 per cent cited this service quality measure as “fair.” Fourteen per cent rated the fair settlement of a claim as “poor”, and another 14 per cent said it was “very poor” (see Figure 10).

Perceived Fairness in Decision Making

Further to the disappointing results in “fair settlement of claim,” many small business owners have voiced concerns that WCB decisions do not weigh employer and employee rights equally; employers are treated less fairly in WCB judgements, and employers have sole responsibility when determining accident blame.

CFIB Manitoba Member Comments 2: Problems with perceived fairness

“Workers Compensation never looked into the fairness/accuracy of the claim. As far as I know it was a fraudulent claim; an incident that never happened at work and off hours.”

“The last doctor appointment on that one claim fell into WCB's next fiscal year so they raised the rates for that year too. I called and asked but they said since the appointment was on the new fiscal year it was like another claim. I don't think it was fair.” (Appendix A)

“All burden is laid on the employer, the employee isn't responsible for any of their own action” (Appendix B)

“Our company worked diligently to prepare a safety manual and ultimately become COR certified. One of our employees was in breach of our safety policies and procedures when she attended a construction work site in high heels and ultimately tripped on a step and hurt herself. Our policy clearly stated the need for closed toe steel enforced shoes. She was trained to the requirement and we had her signature on the appropriate documentation to this effect. WCB approved her claim, and had her on benefits for nearly 4 months with incessant paperwork and follow up required. We felt this was employee error, in fact grounds for dismissal and never should have been approved for a claim.” (Appendix A)

Although these responses indicate that WCB has been doing a predominantly “fair” to “good” job handling claims, there is significant room to improve services in this regard, especially with fair claims settlement. Establishing an Employer Advocate would help ensure that business owners have an outlet for their questions and concerns in this regard.

Recommendation: Continue to ensure the claims process is fair, among other things (e.g. handled in a professional manner, effectively communicated), while improving standards.

Introduction of Employer Advocate

Employer advocates or advisors can be very helpful to employers. Their role is to provide one-on-one confidential assistance and advice without a direct fee to an employer on issues such as claims management or appeals. Currently, six boards have employer advocates or advisors, the boards in British Columbia, Ontario, and all four boards in Atlantic Canada. The remaining boards in Alberta, Saskatchewan, Manitoba, and Quebec do not provide employer advocates or advisors.

CFIB believes an employer advocate or advisor can be very helpful to employers. He or she provides one-on-one confidential assistance and advice, without a fee, on workers' compensation issues, such as claims management and appeals. When surveyed last May in CFIB's Manitoba Post-election Survey, 61 per cent of small business owners agreed that employers should be provided with a WCB employer advocate, 12 per cent disagreed and 27 per cent did not know.

Recommendation: Establish an independent office of the Employer Advocate to provide meaningful support to small business.

Appeal process

When asked how Manitoba small business members rated the appeal process with WCB, of those who had experienced the appeal process, only one per cent said very good and seventeen per cent said good. Twenty-eight per cent said fair, but 54 per cent rated it as poor or worse (25 per cent poor and 29 per cent very poor). As the majority of the experienced respondents rated their experience as poor, improvements to the appeals process are necessary (see Figure 11).

CFIB Manitoba Member Comments 3: Please describe the appeal experience from your perspective (the business owner)

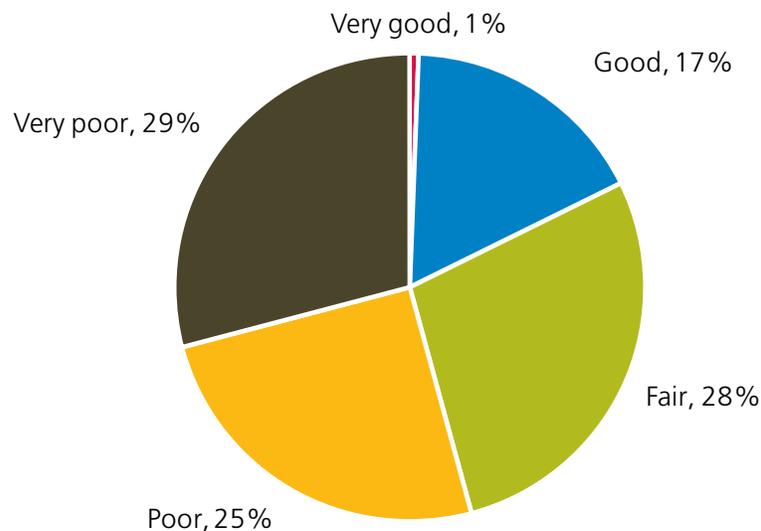
"Years ago we had an issue where the WCB employee was incompetent and arrogant, which cost me a lot of money. After fighting for a few years, a new rep came on the scene who was intelligent and the problem was solved almost instantly. However we could not get back the previous overcharges." (Appendix A)

"The appeal process is so cumbersome that you either have to hire a lawyer or be one to wade through the process." (Appendix A)

"Staff person tried to claim an unrelated injury but was caught in the process. WCB took care of the situation with no fault to my company." (Appendix A)

Figure 11:

How do you rate the appeals process with your WCB?



Source: CFIB 2015 Workers' Compensation Survey (respondents with appeals experience), Manitoba results, n=467.

The 2015 statistics reveal that the average time from date appeal received to date hearing increased from 15.55 weeks in 2013 to 19.41 weeks in 2015 (2015 Appeal Commission and Medical Review Panel Annual Report). This deterioration in customer service is unacceptable.

Rate setting and Assessments

WCB's experience rating program

Experience rating is a system that takes into account a business' claim history when determining its annual workers' compensation premiums. The principal basis of experience rating is that a business with a history of workplace accidents should face higher premium rates. Conversely, a business with a good safety record should be rewarded with lower premium rates.

CFIB acknowledges WCB's new rate setting model and the emphasis that it places on recognizing differences according to business size. However, the new model places a greater influence among small businesses on industry's experience factor, compared to the business' own history. CFIB's surveys reveal support for an experience rating program as Manitoba small business owners believe firms with higher accident rates should be paying higher WCB premiums, and those with exceptional individual history should be further rewarded for past behaviour (CFIB Mandate 260 Survey, September 2015).

Experience rating is necessary to address the concern that many businesses feel they are paying for poor records of others. However, to be effective within the terms of workers' compensation, the experience rating program must strike a balance by providing an economic incentive that adequately reflects the claims experience of a company while at the same time not creating excessive volatility that is unfair and counterproductive.

CFIB is pleased that new model will adjust more fairly to claim history. Many members have cited concerns that, despite a long history of claim-free work, new incidents raise premiums significantly and take a disproportionately-long time to return to normal. As annual rate changes will be capped at 15 per cent upward or downward under the new model, small businesses should be treated more fair.

CFIB will continue to monitor WCB's experience rating program, specifically those new policies impacting small businesses, to ensure that there is a fair balance between experience rating and industry trends in determining rates going forward.

Maximum wage rate

The Committee's discussion paper outlines the issue of consideration of the establishment of maximum assessable earnings level (or a cap) for workers. It states: *"Manitoba is the only Canadian jurisdiction without a limit or ceiling on workers' earnings covered by the WCB. All other Canadian jurisdictions have a cap on the maximum insurable or compensable earnings within the workers compensation system. Maximum insurable earnings levels in Canada vary from \$52,200 to \$98,700 (2016 levels)."* (see Background: Maximum Insurable Earnings in Manitoba for additional details)

We agree with the Manitoba Employers Council (MEC) that the absence of a cap on earnings should be reconsidered. MEC notes that every other insurance scheme in the country, including Manitoba Public Insurance, has a cap on earnings.

Background: Maximum Insurable Earnings in Manitoba

All boards, with the exception of Manitoba, cover an injured worker's loss of earnings up to a maximum amount. The Manitoba Workers' Compensation Act Review Committee recommended the removal of the limit on insurable income and on January 1, 2006 Manitoba became the first jurisdiction to no longer have a cap on maximum insurable earnings for the calculation of benefits. This may result in creating a disincentive for injured workers to return to work. It is also unfair to small firms since basing benefits on income for which no premiums are paid likely means that firms with lower wages are subsidizing those with higher wages.

Recommendation: A maximum insurable earnings limit should be established in the calculation of workers' compensation premiums and benefits.

Avoiding over-compensation

Benefits as a percentage of earnings

One of CFIB's main principles is: "*The system should include incentives and programs that encourage timely return to suitable work. No worker should receive more on compensation than he/she would from working,*" applies directly to the issue of benefit levels.

There are various levels of benefits paid by boards throughout the country. In general, most boards base their benefits on net earnings. When benefits are based on a higher percentage of earnings, a stronger disincentive is created for injured workers to return to work. A higher level of benefits also creates additional financial strain on the workers' compensation system and may place pressure on the board to raise premiums.

It should be noted that comments from CFIB's survey with business owners—*Point of View: Workers' Compensation Survey 2015*—reveal that in the event of a workplace injury, small business owners want their injured employees to be treated fairly by the workers' compensation system, as well as receive sufficient compensation while being off work.

Nova Scotia's board benefits are based on 75 per cent of earnings, the lowest percentage among provincial boards, with 75 per cent net the first 26 weeks, then 85 per cent of net. New Brunswick's board benefits are based on 85 per cent loss of earnings (loss of earnings defined as average net earnings minus net estimated capable earnings) (2015 Small Business Workers' Compensation Index).

In contrast, the boards in Manitoba, British Columbia, Alberta, Saskatchewan, and Quebec all base benefits on 90 per cent of earnings (non-taxable). At 90 per cent of net average earnings (non-taxable), WCB benefits invariably over-compensate injured workers who collect benefits for less than about 39 weeks. Over-compensation means injured workers are better off financially by not working than working. That is, they end up with more than 100 per cent of pre-injury income.

The aim is to set benefit levels at a level sufficient to adequately compensate the more seriously injured worker who cannot be reinstated, while maintaining sufficient incentive for all others to achieve rehabilitation and return to work.

Recommendation: CFIB recommends a graduated approach to reducing over-compensation along the lines of the Nova Scotia or New Brunswick models. The Act should be modified so that all future claims (after the date amendments come in to force) should be at a benefits percentage of 75 per cent of net earnings for the first 26 weeks and 85 per cent thereafter.

Occupational classifications

CFIB recommends a review of employer premiums based on work function within an organization. Therefore, employers with both high-risk functions (e.g. mechanic) and low-risk job functions (e.g. office assistant) pay separate rates based on risk.

Many Manitoba business owners have voiced concerns and agree that there should be separate WCB classifications for different occupations within the same firm.

Given that there is a low risk of injury associated with many support and/or office positions in compulsory industries, it is CFIB's position that premiums should be reduced to reflect the likelihood of injury and provide cost relief to employers. Many small business owners are frustrated with having to pay "production"

assessment rates on their office/clerical personnel where these people are not exposed to the hazards common in the particular type of business. In some high rated industries, the amounts involved are substantial. Assuming a clerical rate would be applied fairly across all sizes of business, this would find favour among small business employers.

CFIB Manitoba Member Comments 3: Manitoba small business owners identify additional policy changes needed

"Our secretary and office workers have to pay the same premiums as a steel erector which is the category we are placed under." (Appendix B)

"They should be able to differentiate levels of premiums for office workers versus plant production employees within the same firm." (Appendix B)

"I have a private plan for my employees that covers the disability needs that WCB covers. Now I pay double coverage (private plan and WCB). WCB gave no ability to opt out, even though private plan has better coverage." (Appendix B)

Recommendation: Modifications to the assessment system to introduce some elements of occupational classification, for example, a clerical rate.

WCB coverage through private insurance firms

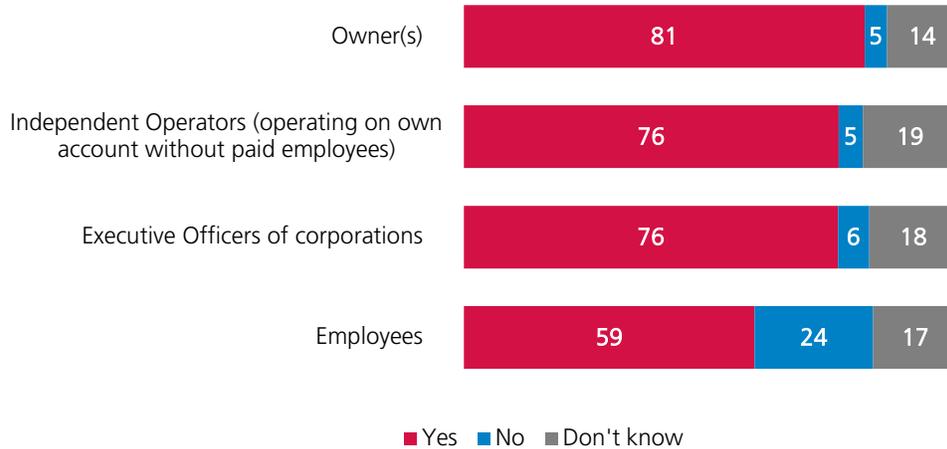
CFIB members favour a competitive system, where WCB coverage is specified to a certain standard by the government, and firms are permitted to purchase their WCB insurance from a source other than the present monopoly:

"In this country, we definitely should have the right and ability to buy coverage for our staff, management, executives, and owners from whomever can give us the best service at the best price." (Appendix B)

When asked whether businesses owners should be allowed to buy their workplace disability insurance coverage from a private insurer (not the workers' compensation system), the results were clear. Eighty-one per cent of Manitoba respondents agreed owners should, followed by 76 per cent agreed Executive officers of corporations should be allowed to buy their workplace insurance coverage from a private insurer, and 76 per cent of respondents agreed Independent operators (operating on own account without paid employees) should be allowed. Still, 59 per cent agreed employees should be allowed to buy private insurance (see Figure 12).

Figure 12:

Should businesses be allowed to buy their workplace disability insurance coverage from a private insurer (not the workers' compensation system) for these categories? (% response)



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

Recommendation: Allow businesses to buy their workplace disability insurance coverage from a private insurer (not the workers' compensation system).

Classification and Assessment

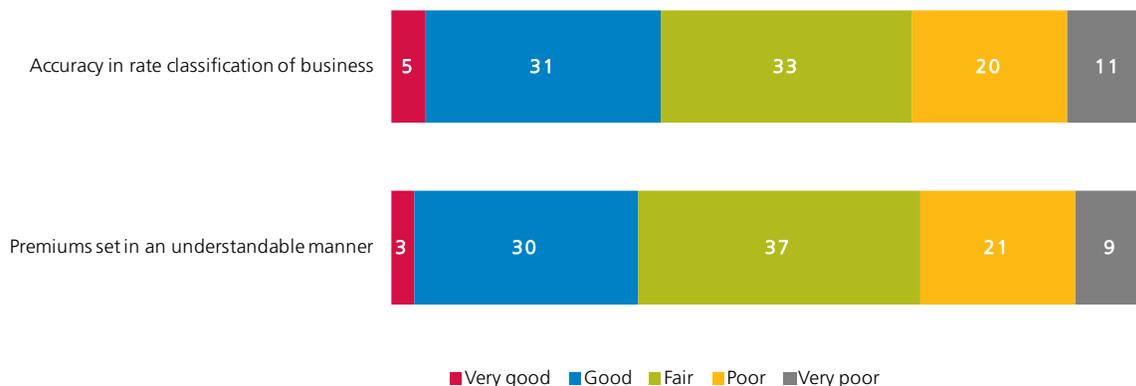
Although classification and assessment are currently going through changes in Manitoba, results below are important metrics to understand how processes can - and need to - improve.

Overall rating of classification and premiums

Workers' compensation boards classify employers based on the industry they do business in. Industry classification is used to determine the premium rate that is set for a business. As such, the accurate classification of a business is crucial for determining the assessments a business will be required to pay. The survey results below show how business owners rate three areas of WCB's industry classification: accuracy in industry rate classification; the level of premiums; and how well the rate setting process is understood.

Figure 13:

How do you rate your WCB on each of the following? (% response)



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

Accuracy in rate classification of business

When asked how Manitoba small business members rated the WCB on the accuracy in rate classification of business, only five per cent of respondents said very good, 31 per cent said good, another 33 per cent said fair, 20 per cent said poor, and 11 per cent rated it very poor (see Figure 13).

Premiums set in an understandable manner

When asked how Manitoba small business members rated their Board on whether premiums are set in an understandable manner, only three per cent of respondents said very good, 30 per cent said good, another 37 per cent said fair, 21 per cent said poor, and nine per cent rated it very poor (see Figure 13).

As nearly one-third of all respondents believe the both of these services are unsatisfactory, clearly improvements are needed.

Recommendation: Ensure all classification and premium information is communicated to small business employers in plain language.

Payments of assessments on actual payroll vs. forecasted payroll

In addition to the industry premium rate, a component of calculating a business' assessment for coverage includes the amount of payroll. When an employer pays on actual payroll, the accuracy of assessments paid to the board is never in doubt. On the other hand, some boards, including Manitoba, require business owners to forecast their payrolls and submit annual estimates in order to calculate their assessment. This may result in assessment calculations that are over- or underestimated. In the latter case, boards charge penalties to employers for these inaccuracies that are difficult for business owners to foresee.

To illustrate, a monthly system based on actual payroll allows January's assessments to be calculated and paid in February, thereby eliminating the guess work required to forecast a business' annual payroll.

CFIB Manitoba Member Comments 4: Red Tape Headaches

"I do not like the new system whereby I prepay for the year and then have to fill out forms stating real dollars, which they then have to deal with and send a refund or receive a bill for new charges." (Appendix B)

"WCB has gone back to making me guess what my yearly payroll will be. As a staffing company, my payroll can vary a great deal. I can report wages and pay premiums on a monthly basis (like CRA) by the 15th of following month." (Appendix B)

"My biggest complaint with WCB is the assessment and payment method they use. Rather than making guessing what your labour will be for the year, it should be a monthly remittance based on actual payroll the same as CPP, EI and tax remittances. That would eliminate guessing what your payroll will be for the year and over paying or paying penalties if you guess low. As it is now, for seasonal employers you need to make payments on WCB before you turn a wheel in the spring." (Appendix B)

Manitoba business owners would find it easier to do business if they were able to pay WCB assessments monthly, based on their actual payroll. Having to forecast annual payroll is difficult and having to pay penalties for inaccurate forecasts is unfair. As one business owner said: *"It would be great if they moved their dates forward for having the new payroll assessment and estimates. It takes from the time of filing taxes, T4's etc. It is a bad time of the year to have another set of reports to prepare with a deadline."* (Appendix B)

Recommendation: Allow employers to pay premiums based on actual, rather than estimated, payroll.

Customer Service

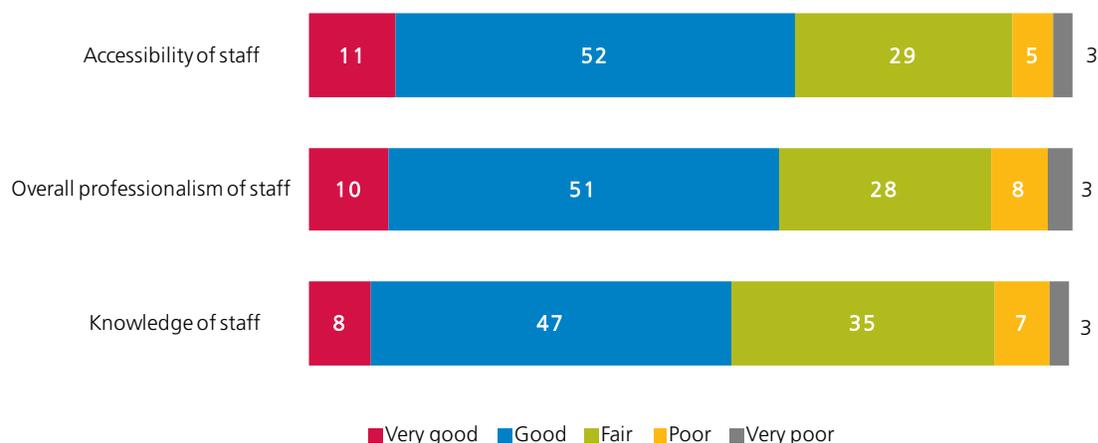
An assessment of workers' compensation is not complete without examining how the Board is performing in serving their small business clients. For the WCB to offer good customer service, it must first understand more than just its product (e.g. regulations and policies pertaining to the workers' compensation system). It is important that Board staff also have the understanding of the needs of their clients.

Many business owners speak of the frustrations they have when dealing with the Board. Customer service is a large component of paper burden or red tape, which in effect equates to time and money for small employers

CFIB recognizes the Board has introduced some improvements to address a number of service delivery concerns, however recent CFIB survey results found that one third of Manitoba respondents still cite the service of WCB staff as Fair/Poor (see Figure 14).

Figure 14:

How do you rate your WCB staff on each of the following? (% response)



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

Accessibility of staff

Only 11 per cent of respondents rated accessibility of staff as "very good." Fifty two per cent of respondents rated this aspect as "good," followed by 29 per cent as "fair." Another five per cent said it was "poor", and finally three per cent thought it was "very poor" (see Figure 14).

Overall professionalism of staff

When it comes to professionalism of staff, just 10 per cent of CFIB members rated the level of service as "very good." Another 51 per cent said the overall professionalism of staff was "good", and 26 per cent thought it was "fair." Eight per cent thought that overall professionalism was "poor", followed by three per cent who thought it was "very poor" (see Figure 14).

Knowledge of staff

In the categories of knowledge of staff only eight per cent of CFIB members rated the level of service as "very good", while 47 per cent thought it was "good." Thirty-five per cent of respondents said the performance was "fair", and seven per cent regarded the knowledge of staff as "poor." Another three per cent described it as "very poor" (see Figure 14).

It is safe to say that no business would be satisfied if one-third of their customers continued to rate their service as Fair/poor. Given the WCB is solely funded by employers, the only rating to which the WCB should be striving is "good."

CFIB Manitoba Member Comments 5: Customer Service

"I have been filing the claims for at least 16 years. Upon the latest claim, I was informed that I have been doing one part incorrectly since at least 2006, but no one had ever brought it to my attention. It was a very obvious mistake so should have been pointed out to me years ago." (Appendix A)

"Even with so few claims, we have had inconsistencies in responses, poor or inaccurate responses, and sometimes just poor communication." (Appendix A)

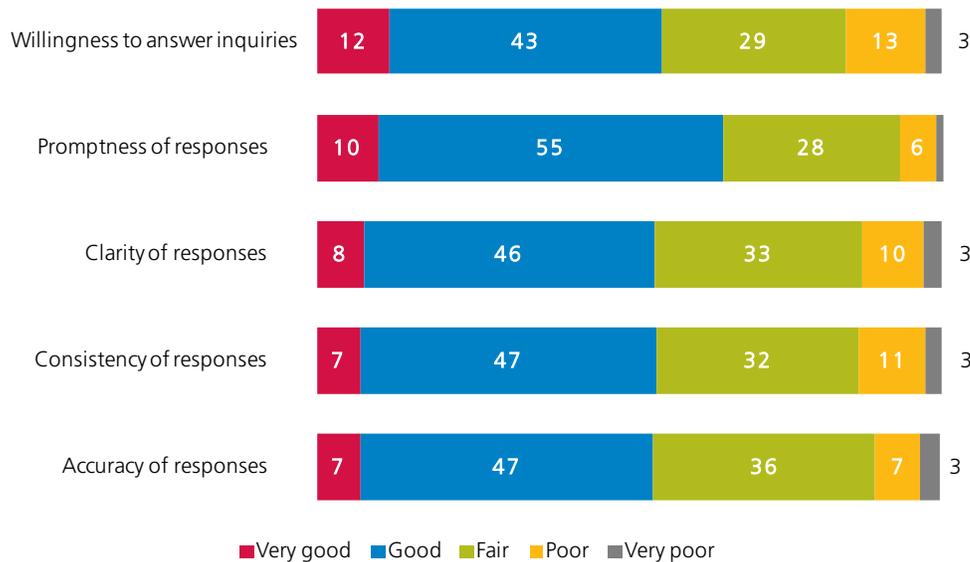
"While trying to get correct answers, I would get different answers at different times." (Appendix B)

"They lost a payment cheque, so I was put in default with no warning. The only way I found I was in default was by customers withholding payment." (Appendix B)

When a business owner calls the Board, she/he expects to receive prompt and accurate responses to their inquiries. Employers suffer in many ways when board staff provide unclear or inconsistent responses. In Figure 15, CFIB assesses how the MB WCB responds to their small business clients in five specific areas; promptness, clarity, accuracy, consistency, and willingness to answer inquiries.

Figure 15:

How do you rate your WCB responses on each of the following? (% response)



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

Willingness to answer questions

In the categories of willingness to answer questions CFIB found 12 per cent said it was “very good.” Another 43 per cent said the service was “good” and 29 per cent said the WCB’s performance was “fair.” Thirteen per cent rated the WCB’s willingness to answer inquiries as “poor” and another three per cent thought it was “very poor” (see Figure 15).

Consistency of responses

Consistency ensures all business owners are receiving the same information. Inconsistent information can make business planning more difficult. In the category of consistency of responses it showed that just seven per cent of respondents thought it was “very good”, while 47 per cent said it was “good.” Another 32 per cent described consistency of responses as “fair”, and 11 per cent thought it was “poor.” Finally three per cent thought that consistency of responses was “very poor” (see Figure 15).

Accuracy of responses

Small business owners wear many hats and must have confidence in the information they receive from WCB staff. Business owners certainly do not have time to verify, re-check and confirm the information they are provided. Just seven per cent of businesses rated the accuracy of information they receive as “very good.” While over 47 per cent said accuracy of responses was “good”, another 36 per cent said that they were “fair”. Seven per cent rated accuracy of responses as “poor” and three per cent said that the accuracy of responses was “very poor.” (see Figure 15).

Promptness of responses

Similarly, only 10 per cent of CFIB members rated the promptness of replies from WCB as “very good.” A further 55 per cent cited this service quality measure as “good.” Twenty-eight per cent rated promptness of responses as “fair”, while six per cent said it was “poor.” Finally one per cent thought promptness of responses was “very poor.” With over one-third of respondents considering the promptness satisfactory at best, this is concerning. Given all the complexities of running a business in today’s environment, waiting days for an answer to a question can pose significant challenges for a business owner (see Figure 15).

Clarity of responses

In the clarity of responses category, eight per cent responded that it was “very good”, while 46 per cent said it was “good.” Another 33 per cent said it was “fair” and 10 per cent thought it to be “poor.” Three per cent said that clarity of responses was “very poor” (see Figure 15).

Overall rating of compliance burden

The time it takes to understand a form, or the number of requirements of the workers’ compensation system, is time taken away from the business owner to operate the business. CFIB’s WCB survey asked Manitoba small business owners’ feedback on the following: the readability and simplicity of forms/invoices; the amount of time it takes to comply with the board’s requirements; and the process for issuing clearance certificates (see Figure 16).

Understanding of my business needs

When asked how Manitoba small business members rated their Board on whether it understood their business needs, only three per cent of respondents said very good. 24 per cent said good, another 40 per cent said fair, 24 per cent said poor, and nine per cent said very poor. (See Figure 16).

Amount of time required to deal with requirements

When asked how Manitoba small business members rated the WCB on the amount of time required to deal with requirements, just four per cent of respondents said very good, 32 per cent said good, another 41 per cent said fair, 15 per cent said poor, and eight per cent rated it very poor (see Figure 16).

Readability, simplicity of forms/invoices

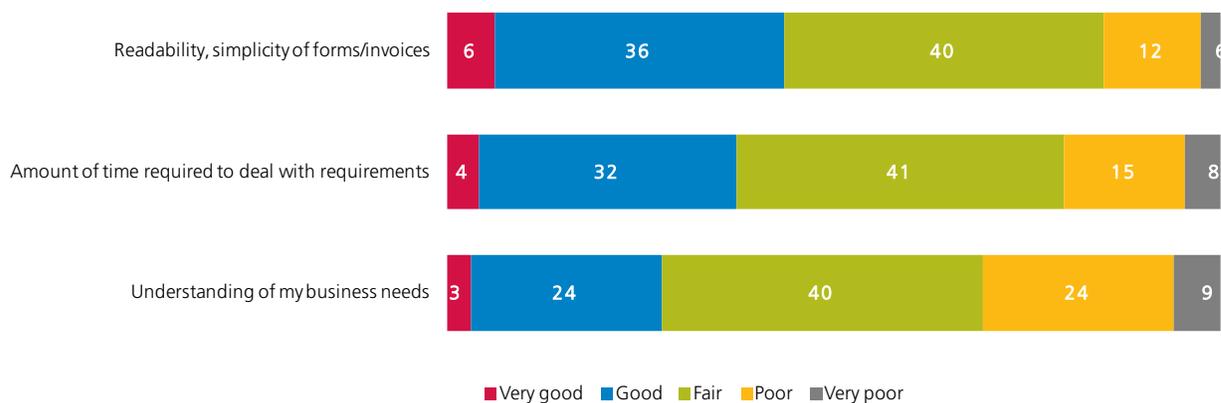
When asked how Manitoba small business members rated the WCB on readability, simplicity of forms/invoices, only six per cent of respondents said very good, 36 per cent said good, another 40 per cent said fair, 12 per cent said poor, and six per cent rated it very poor (see Figure 16).

Understanding of my small business needs

When asked how Manitoba small business members rated the WCB on readability, simplicity of forms/invoices, just three per cent of respondents said very good, 24 per cent said good, another 40 per cent said fair, nine per cent said poor, and five per cent rated it very poor (see Figure 16).

Figure 16:

How do you rate your workers' compensation board response on each of the following? (% response)



Source: CFIB 2015 Workers' Compensation Survey, Manitoba results, n=467.

One popular example to capture the lack of understanding of small business needs, is the lack of clarity surrounding record keeping requirements. When asked in CFIB's 2017-18 Manitoba Budget Survey, 78 per cent of small business owners agreed that WCB should set standards on how long employers are required to keep WCB records. CRA, for instance, requires that records be kept for at least seven years. This uncertainty would provide a positive step to improve clarity for small business owners.

Principles of customer service standards

CFIB believes the underlying principles of customer service standards should include: respect, accessibility of information, consistency of information, clarity of information, timeliness of information and accuracy of information.

Recommendation: Provide training to front-line staff to ensure they are knowledgeable about the needs of small businesses.

Recommendation: Develop and adhere to a Fairness Code for Employers (e.g. Saskatchewan Taxpayer Service Commitments and Standards Code, WorkSafeBC Employers' Fairness and Service Code), making it simpler for employers to understand the services and requirements of the workers' compensation system.

Recommendation: Ensure all information is presented in plain language.

Recommendation: Clearly define record keeping requirements.

Recommendation: Adapt working hours to suit needs of small business.

Recommendation: Measure and report small business customer service satisfaction.

Recommendation: Provide useful information on board websites in a user-friendly manner (e.g. information on injury reporting, claims process, and paying assessments).

Recommendations

CFIB's recommendations to *The Workers Compensation Act* Review Committee 2016 are focused on the elements necessary to ensure a sustainable WCB system.

Financial accountability

1. Change WCB's current targeted funding position of 130 per cent to a funding ratio (total assets over total liabilities) between 100 per cent and 110 per cent.
2. Rebate surplus monies when the funded status rises above a threshold of 110 per cent.
3. A surplus should be rebated in the year it is realized, similar to Alberta.
4. The Board must practice continued vigilance on administration costs.
5. WCB levies should be used solely to fund the compensation of injured claimants and not the bureaucracy within a government ministry. In many cases, Workplace Safety & Health programs duplicate those already provided by industry.
6. The significant investments into SAFE Work and other areas of WCB should be closely monitored and publically reported to ensure that small businesses are receiving a strong return on investment (ROI).
7. All final recommendations of the Review Committee must be thoroughly costed to determine the long-term financial impact to the Board, and as importantly, the impact to Manitoba employers who pay 100 per cent of the cost of WCB.

Cost of premiums

8. Improve the speed at which an injured worker is sent for diagnostic testing and referred to a specialist - with a goal of reducing wait times to zero.

Claims Management

9. Ensure employee reinstatement and return-to-work provisions take into consideration the realities of running a small business.
10. Work more closely with small business owners to promote health and safety.

11. Continue to ensure the claims process is fair, among other things (e.g. handled in a professional manner, effectively communicated), while improving standards.
12. Establish an independent office of the Employer Advocate to provide meaningful support to small business.

Rate setting and Assessments

13. A maximum insurable earnings limit should be established in the calculation of workers' compensation premiums and benefits.
14. CFIB recommends a graduated approach to reducing overcompensation along the lines of New Brunswick and Nova Scotia. The Act should be modified so that all future claims (after the date amendments come in to force) should be at a benefits percentage of 75 per cent of net earnings for the first 26 weeks and 85 per cent thereafter.
15. Modifications be made to the assessment system to introduce some elements of occupational classification, for example, a clerical rate.
16. Allow businesses to buy their workplace disability insurance coverage from a private insurer (not the workers' compensation system).

Classification and Assessment

17. Ensure all classification and premium information is communicated to small business employers in plain language.
18. Allow employers to pay premiums based on actual, rather than estimated, payroll.

Customer Service

19. Provide training to front-line staff to ensure they are knowledgeable about the needs of small businesses.
20. Develop and adhere to a Fairness Code for Employers (e.g. Saskatchewan Taxpayer Service Commitments and Standards Code, WorkSafeBC Employers' Fairness and Service Code), making it simpler for employers to understand the services and requirements of the workers' compensation system.
21. Ensure all information is presented in plain language.
22. Clearly define record keeping requirements.
23. Adapt working hours to suit needs of small business.
24. Measure and report small business customer service satisfaction.
25. Provide useful information on board websites in a user-friendly manner (e.g. information on injury reporting, claims process, and paying assessments).

Conclusion

Once again, CFIB appreciates the opportunity to present our members' views and concerns to *The Workers Compensation Act* Legislative Review Committee 2016. We look forward to providing comments on the Committee's final report, once released, and sharing the results with our members.

While the Manitoba Board's financial position is sound, this should not be a signal that costly legislative changes are warranted. Instead, CFIB recommends all final recommendations of the Committee be thoroughly costed to determine the long-term financial impact to the Board, and as importantly the impact on Manitoba employers who pay 100 per cent of the cost of WCB.

CFIB reminds *The Workers Compensation Act* Legislative Review Committee 2016 that the vast majority of small firms are concerned about workplace safety beyond the financial impact it has on their firm. In virtually every small business across Manitoba, the employer works side-by-side with his or her employees every day. They are often the employer's friend - many times even family. If a small business is interested in getting an employee back to work as quickly as possible, it is not to punish the employee or make sure they re-injure themselves. Small business owners care about the health and well-being of their staff - as people and as the most valuable resources of the firm.

We owe both workers and employers the best and most efficient workers' compensation system possible. Let us not disappoint them.

CFIB Small Business Owners' Views/Comments

We also received hundreds of member comments about the Manitoba Workers Compensation Board. These comments are provided in *Appendix A and B* (see attached).