



December 7, 2021

Dr. Louise Greenberg
Chairperson
Workers' Compensation Act Committee of Review
300-1870 Albert Street
REGINA SK S4P 4W1
wca-cor@gov.sk.ca

Dear Dr. Louise Greenberg:

Thank you for the letter regarding The Workers' Compensation Act Committee of Review. I am pleased to submit comments on behalf of the Ministry of Advanced Education for consideration.

Through our support of the province's post-secondary education sector, the Ministry of Advanced Education is responsible for the delivery of high-quality education and training that responds to the needs of Saskatchewan's people and economy. A critical component of this includes the availability of unpaid work-integrated learning assignments. Most commonly, these program requirements are offered in the forms of student internships, clinical placements, practicums and co-operative education work placements.

Due to the absence of coverage for these types of student placements under *The Workers' Compensation Act, 2013*, the ministry and the Saskatchewan Workers' Compensation Board (WCB) have relied on renewing five-year Memoranda of Understandings and, more recently, agreements to ensure that students are insured. Since 1990, this arrangement has provided coverage to tens of thousands of Saskatchewan-based post-secondary students while undertaking unpaid work-integrated learning assignments.

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Although this arrangement has been effective in the provision of student coverage, the ministry believes that there are several legal and administrative efficiencies that would be realized from amending *The Workers' Compensation Act, 2013* to include unpaid work-integrated learning assignments for post-secondary students. These include:

- Strengthening the Government of Saskatchewan's commitment to supporting work-integrated learning assignments to the post-secondary sector, students, and host employers.
- Eliminating the current need for students to opt into WCB coverage through signing consent and waiver of liability forms, which in turn would:
 - remove the risk of having students inadvertently begin work-integrated learning assignments prior to opting into coverage; and,
 - realize significant administrative efficiencies for post-secondary institutions that are currently responsible for collecting and managing these records.
- Eliminating the risk that the current agreement between the ministry and the WCB may be legally challenged in the case of a student injury or death.
- Demonstrating consistency with other provinces that provide post-secondary student coverage in legislation.
- Avoiding the current lengthy negotiations involved in renewing the agreement every five years between the ministry and the WCB.

In addition to the above, I can confirm that the Ministry of Education and the Ministry of Immigration and Career Training are both in agreement with including Workers' Compensation coverage for work-integrated learning assignments into *The Workers' Compensation Act*.

Lastly, I will note that the ministry consulted with all relevant post-secondary institutions prior to submitting this feedback. No concerns were raised with respect to the ministry's recommendation to enact student coverage.

Dr. Louise Greenberg

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I trust that this provides sufficient background and rationale to support legislative amendments to *The Workers' Compensation Act* and regulations. Please feel free to contact me should you need any further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark McLoughlin', with a large, sweeping flourish at the end.

Mark McLoughlin
Deputy Minister of Advanced Education

cc: Clint Repski, Deputy Minister, Ministry of Immigration and Career Training
Donna Johnson, Deputy Minister, Ministry of Education