



September 26, 2018

Dear Members,

Over the past five years, we've received feedback from the membership about College fees. We understand your concerns and we appreciate the overhead costs for you as a practitioner. We know that you work hard to build and maintain your practice in order to provide care for your patients.

As a health regulatory body, our mandate is to protect the public. Our interests are similar; it's for the well-being of patients.

Our intentions are not to put a financial strain on you as a practitioner; however, we want to ensure that we are sustainable and able to continue our work. In addition to our daily work, we've planned some important objectives and initiatives in our [2018-2021 Strategic Plan](#) and we intend to develop and implement them successfully.

The College is sending out a consultation for the amendments to the College By-Laws. The purpose of this memo is to address the proposed changes to the fee schedule.

We have done our research, compared with other health care regulators in Ontario and have reviewed our current fees. We are proposing changes to the fee schedule and I want to highlight some of the important elements.

Annual Consumer Price Index + 2% Increase:

In the current By-Laws, the College fees are automatically increased by the annual Consumer Price Index (CPI) plus 2%. In year's past, we've typically seen the increase between 3-4%. We are now proposing the following:

The Council will have the option to annually increase the fees by only 2%, and it will no longer be automatic. It must be approved by Council annually. If the College's finances are balanced, the Council will have the discretion to maintain the fees or increase it by 2%.

Harmonized Sales Tax (HST)

Currently we are charging Harmonized Sales Tax (HST) on all fees. We are now proposing to remove the HST.

We have compared with several regulatory bodies - some charge HST and others do not. Regulatory bodies are considered to be a Public Sector Body and may apply for exemption from collection of HST from its members. The advantage for collection of HST is the benefit of [Input Tax Credits](#) on expenses made.

The College is proposing to apply for exemption with Canada Revenue Agency (CRA) and remove the HST from all fees moving forward.

Registration and Renewal Fee:

The Registration Renewal Fee for 2019-2020 is currently expected to be \$1,186.64 + HST = \$1340.90, assuming the CPI is at 2%

The College is now proposing to set a flat fee of \$1,300 for new registrations and annual renewals. The difference for the renewals would be a savings of approximately \$40.

On the surface, we understand the savings are not significant and it is an increase to the membership fees. We're not hiding from that. However, the College had over 3000 members 3 years ago. We are now sitting at approximately 2400 members. The loss in membership is due to the closing of the Grandparented class which means significantly less revenue to carry out the duties of the College.

We have heard from the membership that the College has a high amount of reserves. You are correct. Based on last year's audited statements, we have approximately \$3.8 M in our retained earnings.

We have strategically set aside this amount to ensure that we are able to continue to operate effectively. We will have to dip into these reserves this year. The approved budget for 2018-2019 is \$3.65 Million. The estimated revenue we are expected to receive this year is around \$3 Million. This puts the College in a deficit of \$665,000 this year. This is a practice that cannot be maintained.

We want to be fiscally responsible and ensure that we are sustainable. We've developed a plan where we can maintain consistency with fees and ensure that we have a reserve that will allow us to function for a minimum of six months and have funds available for any unforeseen circumstances.

An example of an unforeseen circumstance is our significant investigations and hearings costs over the past year. It reached nearly \$1 million dollars. That's certainly an amount that we are not comfortable proceeding with as a standard operating cost. We are investing dollars into: our Quality Assurance program; the development of new Standards of Practice; and, the provision of more professional development opportunities. This will ensure our members are increasingly aware of the expectations and reduce the number of complaints and investigations.

Fee Comparisons

We've heard from members that our fees are the highest of all regulators. Well, that's not actually true. We've done our homework and compared our fees with all the 25 other health care regulators and discovered that we're actually the 9th highest.

College	# of Members	Current Reg Fee
Dentists	9,812	\$ 2,160.00
Midwives	858	\$ 1,950.00
Denturists	678	\$ 1,900.00
Podiatrists/Chiropodists	672	\$ 1,700.00
Physicians & Surgeons	41,146	\$ 1,625.00

Dental Technologist	557	\$ 1,556.00
Naturopaths	1,436	\$ 1,551.00
Homeopaths	575	\$ 1,250.00
CTCMPAO	2,394	\$ 1,141.00
Chiropractors	4,707	\$ 1,050.00
Optometrists	2,324	\$ 945.00
Opticians	2,645	\$ 921.00
Psychologists	4,145	\$ 795.00
Audiologists	3,995	\$ 735.00
Occupational Therapists	5,792	\$ 657.55
Kinesiologists	2,294	\$ 650.00
Dietitians	3,942	\$ 620.00
Pharmacists	15,715	\$ 600.00
Massage Therapists	13,667	\$ 598.00
Physiotherapists	8,880	\$ 595.00
Registered Psychotherapists	4,004	\$ 572.00
Respiratory Therapists	3,446	\$ 560.00
Dental Hygienists	13,840	\$ 400.00
Pharmacists Technicians	4,286	\$ 400.00
Medical Laboratory Technologists	6,984	\$ 340.00
Medical Radiation Technologists	6,982	\$ 340.00
College of Nurses	153,850	\$ 200.00

Although we in the top 30%, it's important to keep in mind, we're also one of the smaller colleges. We're the 7th smallest in terms of membership size. Our primary source of revenue is through our membership fees.

College	# of Members	Current Reg Fee
Nurses	153,850	\$ 200.00
Physicians & Surgeons	41,146	\$ 1,625.00
Pharmacists	15,715	\$ 600.00
Dental Hygienists	13,840	\$ 400.00
Massage Therapists	13,667	\$ 598.00
Dentists	9,812	\$ 2,160.00
Physiotherapists	8,880	\$ 595.00
Medical Laboratory Technologists	6,984	\$ 340.00
Medical Radiation Technologists	6,982	\$ 340.00
Occupational Therapists	5,792	\$ 657.55
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Kinesiologist	2,294	\$ 650.00
Naturopaths	1,436	\$ 1,551.00
Midwives	858	\$ 1,950.00
Denturists	678	\$ 1,900.00
Podiatrists/Chiropodists	672	\$ 1,700.00
Homeopaths	575	\$ 1,250.00
Dental Technologist	557	\$ 1,556.00

Despite being a smaller College, we still have all the statutory obligations as the other Colleges. The larger colleges have more members, more revenue, more staffing and more resources, but we all have the same work.

When compared with other College's discipline cases and expenses for investigations and hearings, we are among the highest. In fact, only the College of Physicians and Surgeons and the College of Nurses have more hearings. The colleges that have similar membership sizes, have a fraction of the discipline cases. This is a trend that we do not wish to continue and hope to address by educating the membership through the development of standards

College	# of Members	Current Reg Fee	Discipline Cases	\$ spend on investigations, hearings & resolutions
Physicians & Surgeons	41,146	\$ 1,625	111	not shown
Nurses	153,850	\$ 200	51	not shown
CTCMPAO	2,394	\$ 1,141	15	\$ 981,077
Massage Therapists	13,667	\$ 598	14	\$ 2,491,622
Physiotherapists	8,880	\$ 595	9	not shown
Chiropractors	4,707	\$ 1,050	8	\$ 471,681
Occupational Therapists	5,792	\$ 658	3	\$ 254,632
College of Naturopaths	1,436	\$ 1,551	2	\$ 153,727
Podiatrists/Chiropodists	672	\$ 1,700	2	\$ 229,558
Kinesiologist	2,294	\$ 650	1	\$ 29,114

Professional Corporation

Members that have established a [professional corporation](#) must apply to the register for a Certificate of Authorization with the College. Without this Certificate of Authorization, the corporation is not permitted to practise. We are proposing to reduce the professional corporation annual renewal fees from \$1,000 to \$200.

Other Fees

We've reviewed all the other fees, such as application fees, transfer fees, exam fees, etc. We've tried to make them more consistent and more efficient.

Now that I've provided an overview of why we feel changes to the fees are necessary, we'd like to hear from you and get your feedback. So please review the information carefully and respond.

Allan Mak

Registrar and CEO