

RENEWAL FEE INCREASE

The decision to increase fees was not taken lightly. The following seven factors were considered by Council in proposing an annual fee increase from \$500 to \$590:

1. Comparing Apples to Apples

Many dietitians have expressed the belief that dietitians pay higher fees than any other health profession in Ontario. The reality, however, is that the annual fees for the College of Dietitians of Ontario are among the lowest in Ontario, and the proposed increase will not change that reality. The reason for this common misconception is that RDs make the comparison to nursing.

The *Regulated Health Professions Act* requires all health profession's regulatory bodies to carry out the same objects and duties. This means that the activities and responsibilities performed by colleges are the same, whether that profession has 500 members or 150,000 members. Where membership is large, the College is able to achieve enormous economies of scale. Where membership is very small, the costs associated with performing those responsibilities are shared by fewer members. Thus, the College of Nurses of Ontario, with over 150,000 members, is able to charge annual fees of \$175, while the College of Dental Technologists must spread their costs among its 545 members resulting in an annual fee of \$1316.

Table 1 below, lists the 24 health professions currently regulated under the RHPA, along with the size of their membership and their current annual fees.

While other things, like the number of complaints and discipline cases do factor in to the costs of running a regulatory College, size does have a significant influence and should be considered if comparing the annual fee from one college to another.

Table 2 below, provides a comparison of CDO's fees to other Colleges of similar size (+/- 1500 members). CDO's fees are at the bottom of the range. The proposed fee increase will move the College above only one other College.

Table 1. Ontario's regulated health professions ranked in order of the cost of annual renewal.

Rank	Health Profession	Total Membership (reported to OFC 2012)	Current Annual fees
1	Dental Surgeons (includes professional liability insurance)	8,941	\$2,035.00
2	Denturists	604	\$1,900.00
3	Midwives	638	\$1,695.00
4	Physicians and Surgeons	37,684	\$1,550.00
5	Dental Technologists	545	\$1,316.76
6	Chiropodists	606	\$1,300.00
7	Chiropractors	4,356	\$1,050.00
8	Optometrists	2,072	\$945.00
9	Traditional Chinese Medicine Practitioners and Acupuncturists*	2,175	\$850.00 (increase proposed for 2014 to \$1011)
10	Opticians	2,546	\$835.00
11	Psychologists, Psychological Associates	3,538	\$795.00
12	Occupational Therapists	5,062	\$657.55
13	Kinesiologists	1,307	\$650.00
14	Physiotherapists	7,615	\$635.00
15	Pharmacists	13,400	\$600.00
16	Audiologists & SLPs	3,606	\$600.00 (increase proposed for 2014 to \$700)
17	Massage Therapists	11,200	\$571.00
18	Dietitians	3,451	\$500.00
19	Respiratory Therapists	2,873	\$500.00
20	Medical Radiation Technologists	6,784	\$470.00
21	Pharmacy Technicians	1,023	\$400.00
22	Medical Laboratory Technologists	7,684	\$340.00
23	Dental Hygienists	12,722	\$250.00
24	Nurses	162,585	\$175.15

Table 2. Comparison of CDO's fees to health regulatory colleges within +/- 1500 members.

Health Profession	Total Membership (reported to OFC 2012)	Current Annual fees for General Certificate
Chiropractors	4,356	\$1,050.00
Optometrists	2,072	\$945.00
Opticians	2,546	\$835.00
Psychologists, Psychological Associates	3,538	\$795.00
Occupational Therapists	5,062	\$657.55
Audiologists & SLPs	3,606	\$600.00 (2014 - increase proposed to \$700)
Dietitians	3,451	\$500.00
Respiratory Therapists	2,873	\$500.00

2. Since 2004 the College's membership has increased by 45%.

The significant increase in membership has both positive and negative impacts on the College's balance sheet. On the positive side, the increase in membership contributed to the College's ability to hold annual renewal fees constant, because of the growth in revenue through membership fees.

On the negative side, although many of the College's costs are shared by the membership as a whole (e.g. the College's rent, utilities, and staff), the costs of many of the College's programs (Quality Assurance Program, Registration Program, and Practice Advisory Service) increase as the number of members increases.

3. Increased Workload

- The number of applications processed annually has increased by 57% between 2004-2014.
- The complexity of the applications reviewed by the College has increased, greater differences in the education systems of the international applicants and more applicants from non-accredited programs in Canada.
- The reporting demands and data transfer requirements have increased significantly since 2004, with the introduction of the Office of the Fairness Commissioner in 2007, the Health Professions Database in 2008, changes to the RHPA in 2009 (new requirements for the public register on the College website).
- Changes introduced to the RHPA and directives from the Minister of Health and Long Term care have also added to the College's objects and duties, including the promotion of Interprofessional collaboration and requiring members to have liability insurance.
- The enhancement of the Quality Assurance Program (JKAT in 2008 and assessment of members who practiced fewer than 500 hours over three years) has had a significant impact on work load.

4. Members receive more support.

Since 2004, the College has significantly increased support to members through the introduction of the Practice Advisory Service. Practice questions/inquiries to the College have increased by 150% since 2004. In addition, over 25% of members attend the annual workshops and the Practice Advisors are invited to provide presentations to an increasing variety of organizations.

5. Doing More with Less

Inflationary pressures mean the College has been managing this increased workload with less— If inflation had been applied to the renewal fees annually:

- \$350 (the original fee in 1994) would be \$551 in today's dollars,
- \$500 (the renewal fee in 2005) would be \$603.

6. Responsible Management

The past 10 years have seen significant efforts by the College to contain costs or achieve administrative efficiencies:

- The College offices moved from their downtown location (University Ave) to the current location in the North end of Toronto in 2005, reducing the rent cost.
- Increased use of technology to create administrative efficiencies
 - Reduced costs for printing/postage associated with printing hard copy renewal forms
 - Elimination of data entry costs as members enter renewal information online
 - Increased use of online credit card payments reduces costs of manual processing of credit card or cheques.
 - Increased use of webinars allows college staff to be more efficient by reducing the amount of travel involved in many meetings or presentations.
 - Continuous exploration of lower prices for goods and services (for example, the College recently purchased a new phone system which will significantly reduce costs).
 - Making maximum use of available technologies to minimize administration costs.

The required functions of all health regulatory colleges are mandated in the RHPA, however Colleges do have some discretion in terms of the level of activity in order to satisfy these requirements. The College takes a moderate approach in terms of the scope of regulatory activities.

For example:

- Some colleges select as many as 20% of their members to participate in the higher-cost portions of their Quality Assurance Program (like Peer and Practice Assessment), CDO chooses 9-10% for the PPA and 10% for verification of the Self-Directed Learning Tool.
- The RHPA requires colleges to have a Patient Relations program. Some Colleges choose not to invest in this beyond maintaining a website, while others buy TV, radio, and print advertising. CDO has adopted a modest, low cost approach using internet, limited print advertising and distribution of materials for media pick up.
- Colleges choose how they wish to participate in provincial, national and international work and this affects resource requirements, for both staffing and travel. CDO is an active participant provincially and nationally, but does not have much of an international presence beyond providing some support for the work of the Council on Licensure Enforcement and Regulation.

7. Responsible Fiscal Planning

The College has a tradition of conservative fiscal planning and not spending money unless there was a clear need. As a result of conservative budgeting and administrative efficiencies, the College has been able to manage without fee increases for the past nine years in spite of the increasing demands.

In recognition of the public sector wage freezes affecting many dietitians over the past several years, the College has elected to spend money from reserves rather than contemplate fee increases. After 9 years, however, administrative efficiencies and spending from reserves cannot cover the increasing costs associated with regulating the profession. The proposed increase to \$590 reflects the projected costs required to meet the expected expenditure levels for effective regulation of the profession, and to maintain an appropriate level of savings for emergencies or unexpected opportunities. It is considered prudent financial management to maintain emergency savings at around 6 months of the total operating costs.