

Thank You for Your Feedback!
Proposed Amendment to By-Law No. 7 –
Fees for Registration, Examinations and Other Activities of the College

At its February 12, 2019 meeting, Council approved an amendment to By-Law No. 7 – Fees for Registration, Examinations and Other Activities of the College, for circulation and comment under the provisions of the *Regulated Health Professions Act, 1991*.

On March 6, 2019, the College invited registrants to comment on this proposed by-law amendment. The survey was open for 60 days (until May 7, 2019). CMTO received a total of 2982 responses to the survey.

In the invitation to comment, CMTO explained that sometimes the College encounters difficulties obtaining outstanding fees from registrants. These fees could include fees relating to Specified Continuing Education or Remedial Programs (SCERPs), administrative charges and/or recovering costs awarded as part of a disciplinary proceeding. The proposed by-law amendment, as outlined below, would ensure outstanding fees would be added to the annual Certificate of Registration fee of only the individual registrant who is owing. This reflects the College's ongoing effort to recover costs so that the burden would not unfairly be placed on other registrants. The proposed by-law amendment read as follows:

- 7. In addition to the amounts set out in section 4 and 5, any outstanding balance owing to the College in respect of any decision made by a committee and any fees payable under this bylaw, will be added to and included in the annual fees.**

Shortly after this announcement was sent to registrants, the College received several e-mails and phone calls from registrants who found the wording of the announcement confusing. Many interpreted the amendment to mean quite the opposite of CMTO's intention – that CMTO was in fact suggesting spreading one registrant's outstanding fees across all registrants. In response, CMTO circulated a clarifying note on March 7, 2019.

Due to this confusion, some of the 2982 respondents may have answered the survey in a way that does not truly reflect how they feel about CMTO recovering fees at annual registration from individuals with outstanding fees. CMTO carefully analyzed the feedback to ensure respondents' true opinions were heard.

Given the analysis that was undertaken, the survey results indicate that between 68.6% to 80.4% of respondents support the proposed amendment, while 11.7% to 31.2% of respondents do not support the amendment.

Whether indicating agreement or disagreement, CMTO heard a variety of helpful and insightful comments. Below is a summary of comments offered, organized by themes most to least frequently received:

- Concern that it is fair for each person to be responsible for their own fees
- Collecting fees from only the individual who owes them is standard business practice, just like renewing your driver's licence if you have outstanding parking tickets
- Some respondents said "I do not understand it, but if it means our fees will not go up again, I agree"
- Being responsible for your own fees is a matter of professionalism and integrity
- Some said "I do not believe this problem exists, I do not believe CMTO has difficulty recovering fees"

- Some considered the amendment as too punitive or not rehabilitative enough, and said CMTO should support “its members as a professional association”
- This amendment would amount to too high of fees for one person, if CMTO does not allow someone to renew they will not be able to earn enough to ever pay
- Some asked CMTO to allow forgiveness of this clause for health issues
- Some respondents said they do not trust CMTO to not add additional fees (slippery slope) and questioned what additional fees may be added in the future
- Some registrants said that “CMTO will raise fees no matter the results of this survey”
- Renewing professional registration is separate from one's disciplinary situation
- Registrants should not have to pay to renew at all
- Outstanding fees have nothing to do with public interest
- Some said that they agree that disciplinary fees should be included but not administrative costs
- Some registrants questioned whether 'disciplinary fees' may result from no findings
- Some registrants disagreed with the word "any" (any outstanding balance owing to the College)
- Registrants questioned whether grouping outstanding fees with registration fees might result in registrants receiving an inappropriate tax benefit
- This amendment might deter registrants from accumulating outstanding fees
- Several registrants said they cannot fully agree without knowing the average/estimated dollar amount of these fees

In response to some of these comments, CMTO would like to note that the proposed amendment would apply only those disciplinary proceedings where the registrant was found guilty. In addition, the College has implemented several payment plan options for registrants so that they are not overly burdened financially.