

ANALYSIS OF THE SURVEY RESPONSES BY PROPOSAL

Each proposal area includes:

- The proposed change
- Response data
- Aggregated comments
- A sample of comments
- CASLPO's response to the comments

Proposal #1

Schedule of Fees and Penalties

All of the following fees are in Canadian funds

Type	Current Amount	Proposed Amount <i>Effective October 1, 2017</i>
<u>Annual Fee</u>		
Initial	\$364.00	\$728.00

Response Data:

Do you understand the reasons for the change?

Answer	# of Responses	%
Yes	1048	86.40%
No	165	13.60%
	1213	100.00%

Do you agree that this change is reasonable

Answer	# of Responses	%	
Strongly Agree	96	7.95%	
Agree	407	33.72%	41.67%
Disagree	330	27.34%	
Strongly Disagree	374	30.99%	58.33%
	1207	100%	100%

Comments

101 out of 623 comments (16%) were received relating to Proposal #1.

Greatest Frequency of Aggregated Comments Centred on Three Matters:

- Fees should not increase for IPRs. They are already burdened with student loans, difficulty finding consistent work, and a lower pay scale when work is found.
- Why is more money being directed to mentorship and what are the new tools/resources being added with the additional funds?
- This increase could further reduce applications and negatively affect the membership population.

Sample Comments

1. "First of all, having the "Initial Member" fee DOUBLE in one year is entirely unreasonable. As someone who graduated less than 5 years ago, it is in my experience awfully rare to graduate with extra money. It is not unusual for new graduates/initial members to not have jobs yet, or be hired on contracts and therefore may not be in a financial position to pay any extra amounts. They will already be paying other fees for registration, moving... I completely disagree with new graduates as having to take on a larger burden of the registration fees."
2. "For new IPRs, many of them are leaving school with debt and do not acquire full-time work. Some institutions also pay them less than the lowest pay on the pay scale since they are not yet "general members". For them, paying double the amount to practice could be financially daunting."
3. "I think that the fees associated with applying and initial practice year are too high for many young graduates getting started in the profession, particularly when they often cannot get consistent work. Mentoring a local Canadian SLP during their first year is fairly straightforward, since we know their qualifications and experience. The reporting and paperwork that are required of mentors should be kept to a minimum. I would like to know more details of the 'new tools and resources' that are going to be provided for mentors, to be confident that these are useful and that CASLPO is not wasting money in developing them."
4. "I think that it is outrageous and unjust to expect initial applicants to pay the same fee as general members. These initial applicants have just completed a 2 year degree upwards of \$20,000 in value and likely have student debt to repay to the bank or the government. These students have already completed 500+ hours of uncompensated work (unpaid internships) in order to complete their degrees. In addition, many organizations, in particular private practices, already believe it is acceptable to under-compensate clinicians in the 'initial practice period' due to the fact that mentoring a new grad is 'extra work and responsibility.' If there is no mandate to say that IPPs must be compensated at rate commensurate to that of a therapist with 1 year experience, there is no reason that these IPPs should be expected to pay the same membership fee as a clinician with 1 year experience. Unless mentors are going to be scrutinized in terms of how much support and professional development they provide, and unless IPPs are compensated for their time at the same rate as a general CASLPO member, it is absolutely unacceptable to expect these individuals to pay the full membership fee in their first year."
5. "Having noted that decline of CASLPO revenues is partly caused by today's employment climate of hiring temporary/casual/part-time professionals, increasing fees to these members only further burdens this group of the membership. This group (often new or nearly new grads) have cobbled

together bits and pieces of positions many of whom have assumed significant debt loads for their training. Further an even bigger issue is the stagnant employment environment in Ontario coupled with increasing program enrolments (Western increase from 37 to 50 per year) and new training programs (McMaster 27 students) universities are creating in order to line their own pockets without any regard for their graduates' expectations of obtaining full time employment in Ontario.”

CASLPO’s Response

The Initial Practice Period of a new member poses the highest risk of harm to the public due to the IPRs lack of experience and unfamiliarity with CASLPO’s standards of practice. To mitigate the risk, CASLPO requires that an IPR complete a mentorship period where the new professional has an opportunity to develop new professional and personal skills and receive support and guidance from their mentor to facilitate becoming familiar with College practice standards. Currently, the mentorship process is paper-based and lacks standardization across mentors. CASLPO, through its 3 year strategic plan, has identified the need to further mitigate this risk area by:

- Bringing the mentorship process online. The goals of creating an online process are to ease the administrative burden for mentors and staff, create the ability to aggregate data to address problem areas in the mentorship process, improve standardization of the IPR evaluation.
- Provide training to mentors. Training will allow CASLPO to standardize the work performed by mentors and ensure IPRs are evaluated in a consistent way.

The comments made by members in the survey are valid. IPRs are likely not in the best financial position to afford the full annual fee upon registration and if the fee increases it may further reduce the number of new applicants. However, the reality is that more funds need to be directed to the mentorship process. If these funds are not generated from the IPR fees, they will need to be generated from the pool of renewal fees from all members.

Note: Recent budgetary announcements by the government to increase funding for hospitals, long-term care facilities, home care and the implementation of the government’s Special Needs and Dementia Strategies, will likely increase job opportunities for SLPs.

Proposal #2

Schedule of Fees and Penalties

All of the following fees are in Canadian funds

Type	Current Amount	Proposed Amount <i>Effective October 1, 2017</i>
Registration Fee	\$200.00	\$50.00

Response Data:

Do you understand the reasons for the change?

Answer	# of Responses	%
Yes	990	84.98%
No	175	15.02%
	1165	100%

Do you agree that this change is reasonable?

Answer	# of Responses	%	
Strongly Agree	24	2.06%	
Agree	251	21.55%	23.61%
Disagree	320	27.46%	
Strongly Disagree	570	48.93%	76.39%
	1165	100%	100%

Comments

All 623 (100%) of the comments received addressed Proposal #3. Member comments are segmented and aggregated by the common themes expressed in their feedback.

Note: total number of comments below exceed 623 due to the fact members commented on multiple themes.

Fee to salary ratio (279 comments)

Greatest Frequency of Aggregated Comments Centred on Four Matters:

- Members do not receive annual increases in their salary to keep pace with inflation or any other factor.
- Members in the public sector have not received any regular increases in their salary over the last 5-10 years.
- SLPs are earning less due to the difficulty in finding jobs and are working more casual and part-time hours. This makes it difficult to pay the current fee.
- CASLPO members pay a larger fee as a percentage of their salary compared to other professions.

Sample Comments

1. "I understand your rationale for changes, but generally don't agree! Yes SLPs tend to be working more casual and part-time hours. This means we don't make as much and can't afford the increase in fees. We want to work more, however there are no jobs. We go contract to contract hoping for something regular, permanent and full-time to come up. There is a new SLP class opening up in Hamilton - this will produce more SLPs who will fight for jobs. This will cause less jobs, but more registrants to pay your fees! If you want to focus your efforts on anything, focus on getting the

public sector to understand what we do and why they need SLPs, in the hopes that they will dedicate more funding. Waitlists are huge, and clients are underserved...however there is NO money to hire more SLPs. We are highly skilled and have zero job security. “

2. “The raising of annual fees is way too high. SLP salaries are not going up, jobs are scarce and the fact that the rate of growth is lower does not mean you are making less money off of your members. Many of my graduating class have had to move out of province to find work. There has been a huge increase in class size of SLP programs in Ontario in addition to the creation of a new program at McMaster. Instead of further taxing your members maybe instead take a look at how to streamline your costs. It is condescending to ask for input when I know I won't get a response from you and we need to pay you to practise anyway, so as if we have a choice.”
3. “I do my job well for the benefit of those I serve. I follow the rules and regulations. I am getting tired of paying higher and higher fees for those professionals who do not follow the rules and regulations. CASLPO fees are constantly going up! I have had my first pay increase in over 5 years. It was 1.5 percent. I do not anticipate getting a 2 percent pay increase every year over the next 5 years. I feel that it is unfair for me to be expected to pay higher CASLPO fees regularly when I do not regularly receive such similar increases in my pay even though my expenses are going up.”
4. “Having been a registered audiologist since the inception of CASLPO the fees have essentially tripled over that time. When you look at what we currently pay (\$728) and with a median audiologist's salary being about \$80,000 we pay \$1.00 to the College for every \$110.00 made. Colleague otolaryngologists pay \$1,570 to their college and with a median salary of about \$360,000 they pay \$1.00 for every \$206.00 they make. Colleague nurses a [sic] pay \$175 fee and with a median salary of about \$70,000 they pay \$1.00 for every \$399.00 they make. There are many other colleges but when compared to CASLPO most of them have lesser fees when compared to median salaries.”
5. “In working in the public sector, we do not receive raises yearly, and in fact have only received a 1% raise in two of the last 10 years. It is unreasonable to expect members to pay more fees when we are not being paid more ourselves. The rationale that fees need to increase "due to an increase in resignations, static number of applications and a shift in the job market for speech-language pathologists where casual and part-time work is on the rise" is not logical. The more you increase fees, the more SLPs are going to leave the profession. This is something I have seriously considered. I am only able to work part time and am not sure it is financially feasible to continue to work as an SLP.”

CASLPO's Response

We hear you. The job market for many SLPs is precarious. Full time work is difficult to secure. Raises are few and far between.

We also understand that our role is to regulate SLPs and AUDs on behalf of the public. This role requires that we provide sufficient funding to meet the mandated activities of the College to:

- Register competent practitioners

- Provide assurance to the public that members are meeting professional standards set by the College
- Investigate any allegations of professional misconduct
- Discipline members where there is proof of serious professional misconduct/incompetence

Although CASLPO continually looks for ways to improve processes, do things more efficiently and reduce costs, the reality is that costs related to our mandated activities continue to increase. Additionally, in response to Ministry direction, other costs related to public protection through transparency have been increased.

The fee increases were proposed to ensure that CASLPO meets the obligations of today and ensures fiscal responsibility for the future through our financial reserves.

Cut Costs (218 comments)

Greatest Frequency of Aggregated Comments Centred on Four Matters:

- Rather than increasing fees, CASLPO should look at cost cutting measures.
- In the current environment, SLPs are doing more with less. CASLPO should do the same.
- More burden is being placed on members through a fee increase when membership growth is already an issue. CASLPO should bear the burden by cutting costs.
- CASLPO offices should move outside of Toronto to a location with lower rent, and away from Yonge and Bloor.

Sample Comments

1. "I found this survey to be very vague and lacking in specific examples and concrete plans. Nowhere in this [sic] documents does the College address their own plans/ideas/strategies of cost reductions within its system. For example, looking into moving the College from a Toronto address to a less expensive area. As SLPs we are constantly asked to look at our dwindling resources in order to provide quality service while following best practice guidelines. I was very saddened and frustrated to see that the College has considered these changes and not addressed the impact this will have on members who are already struggling."
2. "There is no indication of consideration of cost containment at the College to offset the cost associated with obligations as outlined, for example, staff salary, staffing levels, location of offices. Was this considered at all? Mid-town Toronto is an expensive market for infrastructure. Relatedly, some administrative tasks have been simplified over the years (many tasks online, online database, e-payments etc) but these savings have not been reflected in fee reductions, lower staff ratios at the College."
3. "SLPs are not getting wage increases. Not even cost of living in the past 6-8 years. I would like to see the College demonstrating strategies to cut costs, and find innovative cost saving strategies before raising fees. SLPs and Audiologists pose very low risk to the public (our lawyers and insurers tell us this) so why are we paying as much as other higher risk groups?"

4. "CASLPO, you need to tighten your belt just as those of us working [sic] the public health or education sector have been required to tighten our belts for years. Most of us do not even get a cost of living increase in our wages that amounts to 2%. We are constantly and chronically being asked to do more with less. CASLPO...do the same, be creative, move your office to a less expensive location, downsize your media campaigns on why the public should use regulated health professionals (SAC and OSLA have got this covered), and recognize the fact that the vast majority of us who do work in public health and education already do all of our own internal audits, meet accreditation standards, are accountable to a health or education institution's policies and procedures, peer review each other, answer to a wealth of regulatory practices, have performance reviews, educate ourselves continually and set our own goals, whether CASLPO is coming to visit or not!"
5. "We have not been informed of any attempts by CASLPO to cut costs. Typically, when corporations/businesses are facing tough times, they make attempts to save money to minimize the financial burden on employees. If retention of members is important to CASPLO, transparency surrounding attempts to cut costs should be presented. To date, what cost saving measures have been implemented by CASLPO? \$250 000 in "office and other" costs seems high - has any thought been placed on relocating outside of downtown Toronto, given Toronto has the highest price of real estate in the province."

CASLPO's Response

CASLPO is constantly looking for ways to contain costs or achieve efficiencies. Over the last 3 years we've achieved the following:

- 41% (\$9,200) reduction in telephone and teleconference expenses by switching to an IP phone system, renegotiating existing contracts and moving to a new teleconference service provider
- 64% (\$4,500) reduction in internet costs by moving to a new service provider
- Elimination of data entry costs as members complete their renewal online
- Reduced the cost of manual processing of credit cards or cheques through increased use of online credit card payments, including an \$8,500 reduction in credit card fees through contract renegotiation
- A \$64,000 in-year reduction in costs for 2016-17 due to an unexpected decrease in fees revenues
- A change in health insurance providers to reduce benefit costs
- Mailing and printing costs reduced significantly through electronic distribution of meeting materials and College newsletters and membership communications
- Holding many College council Committee meetings electronically rather than in person.
- Negotiation of an improved hotel accommodation discount for Council members and peer assessors
- Establishment of a new staff salary compensation grid, which is closely aligned with salary levels of other Colleges of comparable size and budget, including annual salary restraint measures.

The College offices moved from Yonge and Bloor (downtown Toronto) to Yonge and Lawrence (north Toronto) in 2004, and a ten-year lease was secured. After a year of examining all options, CASLPO

renewed its lease at Yonge and Lawrence in 2014. All regulatory healthcare colleges have offices in Toronto. Most are located in downtown Toronto. After an exhaustive study, including advice from a real estate broker, CASLPO opted to stay in its current space. Travel costs for Council members and staff attending meetings in an office location outside of Toronto were found not to be economical. Any lease savings would be offset by this factor.

Rising costs of Complaints, Reports and Discipline (140 comments)

Greatest Frequency of Aggregated Comments Centred on Five Areas:

- Why have costs for complaints, reports and discipline risen so significantly?
- What evidence does CASLPO have to substantiate that these costs will continue to rise?
- CASLPO needs to find efficiencies in the process rather than passing on the costs for complaints, reports and discipline to its members.
- There appears to be very few cases mentioned in the Annual report. How can these processes cost so much money?
- \$315,000 spent on 2 discipline cases is excessive.

Sample Comments

1. "Costs for discipline cases, hearings and court costs have increased by 215% over the last two years-My question is WHY? Is the College looking into patterns and reasons for this increase and if so, what are the results? Is the College looking into ways to reduce these incidences? Costs for complaints, reports and appeals involving members and cease and desist orders against unauthorized practitioners have risen by 75% over the last two years-I'm not sure why practicing and authorized practitioners are responsible for these costs? These fees should come from the involving individuals."
2. "While I understand the rationale for fee increases set forth in this survey, particularly the huge escalation in costs associated with disciplinary matters I question whether these costs are one time or not-is it even possible to predict? We have been given no information about the 2 cases that had these outstanding costs so it is impossible to evaluate. It may have been a bad spell of complex, but more routine sailing ahead."
3. "What evidence do you have that disciplinary expenses are going to continue to increase, and that it is necessary to therefore increase membership fees. CASLPO has had some high profile complaints - which have been disputed by members - resulting in some extraordinary expenses. I would expect that the long term trend of minimal expenses will continue - thus it is not necessary to increase the fees in anticipation of continuing along a trajectory. This is a once in a decade incidence, and not a pattern necessitating an increased budget line."
4. "I strongly disagree with the increase of our fees because CASLPO is unable to find efficiencies in the complaints and disciplinary departments. I am opposed to an increase in every member's fee in order to pay for complaints investigations and discipline hearings for a very small number of individual members. Also, I believe many complaints are frivolous and come from a public member

who is unhappy with the service, not the performance of the provider. The College should not be spending time and membership dues investigating unsubstantiated and frivolous complaints.”

5. “As a college, you must find ways to cut costs to avoid passing excess fees on to our members. Across the health care system, we are all cost cutting and yet CASLPO continues to increase our fees for no true reason. In reading the Annual report, there are very few disciplinary actions, very few complaints and yet our fees continue to rise. You have plenty of money to do what needs to be done and a diligent group of SLPs and AUDs who are compliant and see this as important. Please find a way to use our money more wisely. You are taking advantage of the fact that we MUST join to avoid being accountable to the members that pay your salary. While I know that you are accountable to the public and not to us, please consider that we are professionals who do the best we can, and work in a health sector that does not pay us handsomely for this. Find ways to cost cut, not increase fees. Very disappointed in the way CASLPO is handling our money.”

CASLPO’s Response

Costs have increased over the last few years due to the increase in the number of complaints and reports received, the increased complexity of the cases and the larger portion of members being referred to Discipline.

The following is a breakdown of the activity with respect to complaints, reports and discipline by year:

	2014	2015	2016	As of May 29, 2017
New complaints	11	31	15	9
New Reports	5	9	8	8
Complaints or reports carried forward from the previous year	7	8	35	33
Discipline hearings	0	1	1	0 * *1 member has been referred to Discipline. Hearing date to be scheduled
Appeals	1	2	5	4
Total	24	51	64	54

The year over year comparison highlights several things:

1. Overall, the total number of complaints, reports, hearings and appeals has consistently increased.
2. A large number of complaints and reports are getting carried over from one year to the next due to the complexity of the cases. The increased complexity necessitates the need for more investigations and expert reports.
3. The new complaints and reports received each year are increasing.
4. One Discipline hearing is taking place per year.
5. The Discipline hearings in 2015 and 2016 were both contested.

To provide some context, there is a large range of costs per case based on the complexity and the nature of the case. A simple straight forward case may cost the College up to \$600, while a complex case (where an investigator report and expert opinion are required) may cost the College \$8,500 on average. If the member is referred to discipline, the costs will vary based on the number of hearing days. If the hearing is uncontested, the matter can be completed in a day and cost the College \$1,000 - \$2,000. If the member contests the allegations, the hearing could run for many days and cost the College approximately \$8,000-\$10,000 per day.

The College has an obligation in meeting its public protection mandate to hold a hearing when there are serious concerns of professional misconduct/incompetence. In the same vein, any member referred to discipline has the right to respond to the allegations in a full public hearing. These are legal obligations and rights that the College does not have the authority to ignore or avoid, and the College must follow the statutory procedures as required.

In all cases, College committees and staff have processes in place to mitigate the risk of incurring unnecessary or excessive costs. These mitigation processes include:

- Investigators are not appointed to every case. The Inquiries, Complaints and Reports Committee evaluates whether an investigation is warranted on a case by case basis.
- Experienced investigators are used to reduce costs.
- The Director of Professional Conduct reviews the investigation plan and constantly monitors investigation costs.
- All disbursements outside of the investigation plan need to be approved by the College before they are incurred.
- Prior to referring any cases to Discipline, the Inquiries, Complaints and Reports Committee determines:
 1. Are the concerns of such a serious nature that a referral to the Discipline Committee is justified? *If yes, then:*
 2. Is there sufficient evidence available to prove the allegations?
- The Committee can request a legal opinion when a case is unclear to avoid referring a matter that does not meet this threshold and to ultimately save the cost of a hearing.
- Prior to a discipline hearing taking place, the College holds a pre-hearing conference in an attempt to resolve the allegations. The hope is to achieve an Agreed Statement of Facts (ASF) and Joint Submission on Penalty (JSP) which best meets the interest of protecting the public. If an ASF and JSP can be reached, then a hearing can go from spanning days to involving just a few hours.

CASLPO fees are higher than other Colleges (76 comments)

Greatest Frequency of Aggregated Comments Centred on Three Matters:

- CASLPO fees are higher than other provinces.
- CASLPO fees are higher than other professions.
- CASLPO fees are higher than other rehab and mental health professions and the risk of harm is significantly lower.

Sample Comments

1. "I have a number of thoughts regarding the proposed fee changes. We already pay much higher fees for CASLPO membership than most other rehab and mental health professionals (OT, PT, social work). I don't know how this can continue to be warranted or justified. I don't think the risk factor inherent in much of our work is higher than OT, PT or mental health - it is arguable less invasive and with less risk for serious harm, especially in non-hospital settings. There is a good argument to be made that we are paying more than enough already. What I would like to hear, instead of justifications for increases in fees, is how you have explored reducing inefficiencies in the organization. I have a hard time understanding how raising fees is of benefit to members."
2. "Have other regulated health professions colleges increased their fees to the same extent? And what do audiology/speech language pathology colleges in other provinces charge? Additionally, you are able to prorate fees for new members when they complete their mentorship, but won't do it for members who go on parental leave? Seems like another money grab... All in all, it is hard to have faith in the agency that regulates my profession and is supposed to protect the public when it is gouging its members. But what choice do myself and my colleagues have? If we want to continue working in our chosen professions and keep helping Ontarians, we must pay these outrageous fee amounts. I fully expect that you will say that you appreciate our feedback and will consider it... and then completely ignore it and do what you want."
3. "The proposed increases in membership fees is in my opinion [sic] unacceptable. In comparison to other allied health professions and medical professions our group pays the highest fees as a ratio of our annual average income by anywhere from 50 to 200%. I understand the need to pull funds to support the college from somewhere however I do not feel that the work the college does is justified as it certainly has not helped my practice to perform better from a salary perspective. There is no regulation or control to benefit audiologist and speech language pathologist professional positions over that of a CDA or HIS. Additionally, you suggest increased payments based on the rate of inflation but my salary does not increase based on the rate of inflation annually and I would argue that very few others on [sic] our profession experience the same increases in salary."
4. "Increasing annual fees for such a very low risk profession is ridiculous and robbery. Engineers with PEO pay \$200 a year in a very high risk profession with huge liability issues. Why should members pay more because of decreased enrolment? Fees were raised previously because the enrolment was too high! Cut back your staff or place them on contract like we are when things get busy or die down. Cut your costs instead of increasing our fees. Increased costs for developing supports to assist with mentoring? No thanks. Many organizations have built in mentoring supports already for their staff. You want to increase our fees????, I haven't had a pay increase in years. Not even COLA. Not impressed."
5. "Other provinces are not even comparable to what SLPs in ON are paying. SLPs, including myself, have had to sacrifice other memberships such as; [sic] OSLA, to offset CASLPO's fees, which has implemented in less professional development and access to important issues and discussions. Please reconsider this proposed change."

CASLPO's Response

Members expressed the belief that AUDs and SLPs pay significantly higher fees than other comparable health professions in Ontario. As depicted in *Table 1*, the reality is that annual fees fall right in the middle of all other health professions in Ontario. In correlation with annual fees, CASLPO's total membership number also falls right in the middle of all other health professions in Ontario.

Membership size does matter. Although all health profession regulatory bodies are mandated to carry out the same objects and duties according to the *Regulated Health Professions Act (RHPA)*, professions with large memberships have the ability to achieve enormous economies of scale with overhead costs. Conversely, professions with smaller memberships must spread overhead costs over fewer members. Additionally, all health professions have annual operating costs that are variable and increase as the number of members increase. These costs include:

- The number of domestic and internationally-educated applications received
- The number of peer and/or practice assessments performed for quality assurance
- The number of practice advice calls and emails received
- The tools provided to members to maintain their professional standards (i.e practice standards and guidelines, learning modules, webinars and in-person events), and
- The number of complaints, reports and discipline matters

As depicted in *Table 2*, CASLPO's annual fees fall right in the middle of other health professions in Ontario of similar size.

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

Rank	Health Profession	Total Membership (reported to OFC in 2015)	Current Annual Fees (taxes included if applicable)
1	Dental Surgeons (includes professional liability insurance)	9,929	\$2,160
2	Denturists	670	\$2,147
3	Midwives	803	\$2,000
4	Chiropodists	672	\$1,700
5	Physicians and Surgeons	40,258	\$1,625
6	Dental Technologists	562	\$1,520
7	Optometrists	2,243	\$1,067.85
8	Chiropractors	4,712	\$1,050
9	Traditional Chinese Medicine Practitioners and Acupuncturists	3,158	\$1,033.67
10	Opticians	2,688	\$877
11	Occupational Therapists	5,616	\$743.03
12	Audiologists and Speech-Language Pathologists	3,905	\$728 (increases proposed for 2018 - \$743 2019 - \$758 2020 - \$773 2021 - \$788)

			2022 - \$804)
13	Pharmacists	15,113	\$678
14	Kinesiologists	1,729	\$650
15	Dietitians	3,806	\$608
16	Physiotherapists	8,625	\$595
17	Massage Therapists	13,114	\$589
18	Psychologists, Psychological Associates	3,728	\$550
19	Respiratory Therapists	3,152	\$500
20	Medical Radiation Technologists	6,902	\$470
21	Pharmacy Technicians	3,835	\$452
22	Dental Hygienists	13,245	\$400
23	Medical Laboratory Technologists	7,349	\$384.20
24	Nurses	171,264	\$271.20

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

Health Profession	Total Membership (reported to OFC 2015)	Current Annual Fees for General Certificate (taxes included if applicable)
Chiropractors	4,712	\$1,050
Opticians	2,688	\$877
Occupational Therapists	5,616	\$743.03
Audiologists and Speech-Language Pathologists	3,905	\$728 (increases proposed for 2018 - \$743 2019 - \$758 2020 - \$773 2021 - \$788 2022 - \$804)
Dietitians	3,806	\$608
Psychologists, Psychological Associates	3,728	\$550
Respiratory Therapists	3,152	\$500

Members also expressed the belief that AUDs and SLPs in Ontario pay significantly higher fees than AUDs and SLPs in other Canadian provinces. As depicted in *Table 3*, CASLPO fees are the second highest in Canada but CASLPO’s membership is by far the largest. When you look at CASLPO’s fees and membership as a percentage of the average, CASLPO’s fee is 1.2 times the average whereas CASLPO’s membership is 2.7 times the average. CASLPO’s fees are disproportionately lower than the size of the membership when compared to the averages across the provinces.

Table 3. Comparison of CASLPO’s fee to Colleges in other Canadian provinces that regulate AUDs and SLPs

Province	Total Membership	Current Annual Fees for General Certificate (taxes included if applicable)
Manitoba	461	\$810.34 (increases approved for 2018 - \$850.85 2019 – 893.40)
Ontario	3,905	\$728 (increases proposed for 2018 - \$743 2019 - \$758 2020 - \$773 2021 - \$788 2022 - \$804)
Quebec	2,972	\$692.73
Alberta	1,713	\$650
Saskatchewan	404	\$600
British Columbia	1,716	\$500
Newfoundland and Labrador	177	\$500
New Brunswick	322	\$350
Provincial Average	1,459	\$604

Why are fees increasing by 2% (47 comments)

Greatest Frequency of Aggregated Comments Centred on Four Matters:

- Instituting a 2% increase each year when inflation isn’t known and the external job environment is precarious is not reasonable.
- Fees have increased by significantly more than inflation over the years.
- A fee increase shouldn’t be needed because there should be a surge in membership with the new McMaster program and increased enrollment at other Universities.
- Without knowing how the College spends members’ money it is difficult to support a fee increase.

Sample Comments

1. “In this current fiscal climate, I think it is very presumptuous to assume that a 2% increase is in line with inflation when job opportunities and public funding for SLP and audiology positions have been on the decline. Many publicly funded jobs, unionized and non-unionized, have not experienced pay raises in several years. In addition, a member in their first year of practice is very unlikely to have a steady income considering the rise of part-time and casual work, so to ask them to pay their registration in full is unfair. I understand the role of a regulatory body is to protect the public first and foremost, however I am very uncertain as to what CASLPO has been doing in this regard with our registration fees to date, so I am equally wary about what would be done with the increase in

fees. Overall I'm very disappointed and strongly against the proposed fee increases. It is irresponsible, completely unethical and wildly inappropriate.”

2. “In my 15 years as [sic] member of the College, fees have increased from \$500 to what will soon be \$800 -- this seems like well beyond inflationary changes. One of the reasons for the increase over the next 5 years is said to be the decline in membership -- could fees be reduced when membership increases? With more SLP graduates coming from the new McMaster program in two years' time, numbers will go up. I was also not sure how changes in types of work (casual, part-time) have impacted membership numbers or the fees CASLPO receives -- it is my understanding that anyone who practices as an SLP, from one hour a year to full-time, has to hold a General membership.”
3. “I feel that it is irresponsible to increase fees without providing the membership with an accounting of your budget, including expenses and income. Since 2010, College fees have increased from \$500 to \$728, an amount of 46%. In looking at the cost of inflation, \$100 in 2010 is now equivalent to \$111 today, or an increase of 11%. In that period, my income has increased not at all-minimally. Speech-Language Pathologists do not earn an income that justifies this cost. While I understand that our population base is smaller than many colleges, this would also mean fewer associated costs, if one assumes an equal incidence percentage. Occupational therapists, who I might presume have similar numbers to ours, pay less than our current fees, say nothing of an increase. In this day and age, there is no reason why you cannot find areas in which to economize. Before I would agree to this increase, I require more information, and more justification. The justifications you have provided are not substantial and do not support your request. You will have to do a much better job at convincing me that these increases are required before I will ever support your request. I hope that you will not proceed with this ill-thought-out plan.”
4. “Three years ago, when CASLPO announced it was first going to increase registration fees, one of the reasons stated was an increase in membership/registration. Now we are being told one of the reasons for the increase is a slowing in membership growth due to increased resignations and a rise in casual and part-time employment. The Annual Reports suggest membership continues to grow: - 2014 new membership was up by 12.09% - 2014 total membership was up by 3.32% - 2013 new membership was up by 7.69% - 2013 total membership was up by 2.11% The latest report noted 65 resignations, and suggested this was an increase, but as far as I'm aware resignation numbers were not captured in the previous year's report. Over the next several years, you will expect the numbers to continue to climb, given McMaster University is initiating its new Masters program in September 2017, with almost 40 new spots. We were also advised that U of T will be increasing its numbers by 10 students over the new two years. I'm certain this will soon be followed by an increase in enrollment at Western and other Ontario schools. Many students within Ontario programs reside in the province (or hope to practice -- may have to leave due to poor job market).”
5. “Since 2010, our fees have increased from \$500 to \$728. This is equivalent to a 65% increase. If you look at the Consumer Price Index, inflation from 2010 to 2017 was equivalent to 11%. I see a big discrepancy here. As a full time employed SLP, I've had a salary freeze for the past 4 years. When I was on parental leave, and not earning an income, I had to pay full college fees. Part-timers also pay full college fees. I understand the College is not an organization that is looking out for my interest,

but for the public interest. Therefore there is no incentive or obligation from the College to consider needs of their "members". However, it is us "members" that are funding the college. Please don't create further hardship for your members!! Please stop spending money on these surveys and asking for member opinions. We all know that our opinions don't matter and the College will do what they will regardless. I'm sure most members were not in agreement with the last round of fee increases!!"

CASLPO's Response

Although the rise in fees since 2002 has exceeded the rise in inflation by 15%, it is closely tied to the rise in membership. *Table 4* depicts the fact that CASLPO's membership has actually increased at a faster rate than annual fees paid by members.

Table 4 Increase in annual fee compared to the increase in membership size from 2002 to 2016

	2002	2016	# Increase	% Increase
CASLPO Annual Fee	\$500	\$728	\$228	46%
CASLPO Membership	2,678	4,003	1,325	49%
Increase in Inflation between 2002 and 2016 <i>(per Bank of Canada)</i>				31%

The proposed increases of 2% are not driven by inflation; inflation is only one of many factors that is causing costs to increase. Each College's operating expenses will vary year over year by such factors as:

- The population of the membership
- The number of domestic and internationally-educated applications received (number of IEAs has doubled over last two years).
- The number of peer and/or practice assessments performed for quality assurance (number has increased from 35 to 50)
- The number of practice advice calls and emails received (number has increased from 1788 to 2099 over the last year)
- The tools provided to members to maintain their professional standards (i.e practice standards and guidelines, learning modules, webinars and in-person events), and
- The number of complaints, reports and discipline matters
- Inflation or changes in the external environment

Note: The largest costs that vary year to year and have the biggest impact on the bottom line are the costs associated with complaints, investigations and discipline.

Increases of 2% were proposed due to the following considerations:

- The revenue increases would enable CASLPO to generate funds to meet its reserve goals and mitigate the risk of having insufficient funds to deal with emergencies or unexpected events
- Rather than having to institute a large one-time increase, member feedback supported a lower amount spread out over a number of years
- The fees were increased by 2% in previous years and the membership accepted the amount

- Inflation is expected to hover between 1% to 2% over the next 5 years

College Services (41 comments)

Greatest Frequency of Aggregated Comments Centred on Four Matters:

- CASLPO does nothing to benefit its members.
- Compliance activities (i.e. SAT and peer assessment) are excessive and are not warranted.
- CASLPO should do more to protect SLP and AUD jobs rather than simply offer title protection.
- CASLPO takes a passive role with respect to legislative changes with regard to SLP and AUD professions and is out of touch with members.

Sample Comments

1. "OSLA represents the S-LP and Audiologist professions when engaging with regulators at the time regulations are being developed. OSLA helps the profession survive in an increasingly competitive world. CASLPO simply accepts whatever legislation is passed and then ensures S-LPs and Audiologists abide by that legislation in the interest of public safety. CASLPO blindly accepts the rising trend of casual and part time work for the professions while expecting the shrinking pool of S-LPs and Audiologists to blindly accept increased fees. It's high time that CASLPO consider either partnering with OSLA or dissolve completely to allow OSLA to take on the roles of both representing the professions to regulators and, with intimate knowledge of the regulations, protect the public in accordance with those regulations. CASLPO's proposal to increase fees is out-of-touch with the reality of the professions. If fees continue to increase, more professionals, including myself, will be rethinking their futures and may decide to leave the professions all together. I simply cannot afford increased fees."
2. "My overall professional dues exceed \$1500/year - with CASLPO being over half of that amount. At least the other organizations I belong to provide the public with education as to what I can offer in my role...and provide me with opportunities to further develop my skills. With CASLPO, I understand the purpose of the Regulated Health Professionals Act is to protect the public from unscrupulous practitioners - & I am in full support of this - but it should also include protecting the public from other professionals providing speech and language recommendations. You provide us with no job protection - title protection only - yet there are professionals in the province providing SLP-like support to families!"
3. "I believe that the auditing process is important, but NOT to the extent that it is being done. You could get a good picture if people are meeting the expectations when they submit their proof of compliance and from the continuing education etc. A site visit to each person being audited is frankly going overboard and an unnecessary large cost. We have no guidance from CASLPO regarding information saved on the cloud or encryption...what is/isn't considered safe on our computers etc."
4. "CASLPO should also consider supporting access to services as a means of protecting the public. If the public continues to face difficulty accessing S-LP services (e.g. long wait lists, cutting outpatient programs, pockets of populations that do not qualify for services, unequal access to services across

and within LHINs), there will be no public to protect. OSLA provides support within this realm, but it is not enough, given membership numbers are not what they should/could be. It is unfortunate, as increased CASLPO fees will likely have a negative impact on the number of OSLA members, as it becomes more difficult for members to come up with the funds to stay registered with associations/regulatory bodies.”

5. “As a 12th year member of CASLPO, I can indicate from my own experience as well as from having had many talks with colleagues on this subject, that CASLPO does NOTHING to benefit its members. Unlike ASHA in the US, CASLPO doesn't provide anything of substance or value to its membership. ASHA offers conferences, resources, webinars, evidence-based articles on their website etc etc. The CASLPO journal, by contrast, offers absolutely nothing of clinical value. I recently completed a peer review and the inordinate amount of time it took me to upload the materials to ensure I am adhering to all of the many rules of the college took many valuable hours and hence, money. It is quite shocking how stringent our college is as compared with other regulated professions - eg Psychologists have nothing close to the rigorous process required for SLPs. And really, other than for SLPs involved in dysphagia, how much inherent "risk" is there in our profession that we have to go through such stringent procedures for self assessment and peer review? I am resentful that we need to pay such high dues to a college that does not serve its membership at all.”

CASLPO's Response

The role of CASLPO is to protect the public through self-regulation. The privilege of self-regulation requires that the professionals involved fund the cost of regulation. Members feel that they don't receive any benefits from the College but that is simply not the case.

- Members are able to use a protected title which differentiates their services compared to non-regulated practitioners
- The public has greater trust in regulated professionals
- CASLPO ensures that there is a level playing field among practitioners with respect to advertising
- CASLPO stops non-regulated practitioners from claiming they are SLPs or AUDs
- Members can call CASLPO with any practice related questions
- Practice standards and guidelines are created for members to help them meet the standards of practice
- CASLPO hosts in-person forums, E-forums and webinars to address current issues that the membership is dealing with
- All members are eligible to run for Council if they would like to have more of an impact on what CASLPO does

In terms of compliance activities, CASLPO's rate of peer assessment of its members is less than 1%. Some Colleges select as many as 20% of their members to participate in peer assessment. The results of the peer assessment process show that, on average, 17% of members peer assessed are falling below the standards. When members fall below the standard, there is risk of harm to the public. Therefore, CASLPO feels that the peer assessment process provides verification that members are meeting standards and provides the College with the ability to work with members who are not. CASLPO's strategic plan proposes that funding be directed to increase the number of peer assessments over the next few years.

Public Awareness (39 comments)

Greatest Frequency of Aggregated Comments Centred on Five Matters:

- CASLPO is currently spending too much on public awareness.
- The current public awareness campaign is ineffective.
- Rather than spending money on informing the public on how to make a complaint, CASLPO should spend the money on educating members on how to avoid having a complaint brought against them.
- Members pay OSLA to inform the public. CASLPO should not take on this responsibility.
- CASLPO should reduce the use of pamphlets and brochures and concentrate on social media.

Sample Comments

1. "The public campaigns fail to be meaningful to members and the public. I would rather see more basic outreach to the public and better support for clinicians. As an SLP working in acute care, I don't find it helpful to call my college and get absolutely zero feedback on questions of policy, procedure and best practice. I don't feel supported. That would be a better use of our hard-earned dollars. Not everyone is unionized and can get that cost-of-living increase to match the rising fee cost. Not to mention that anticipating the changes in membership and keeping up with CRA rules is up to the college and should not fall as a burden to its members. This shows a lack of vision and preparedness."
2. "With as much respect as possible, the college's efforts to educate the public, which are part of the reason for the increase in fees, has been ineffective. I'm in the field and I've been unaware and unexposed to the education efforts the college is attempting to make. Many other organizations are doing a far better job at getting this message out to those who need it."
3. "I am not really interested in my membership fees going towards video/brochure publicity for the college. I pay my SAC and OSLA memberships in order to advocate for the profession."
4. "Over the last few years, the cost of our College membership has risen dramatically. This has become particularly burdensome for those of us who work part-time. These increases, combined by the general consensus that CASLPO does nothing to promote or better our profession, is disturbing. Not only that, but the brochures CASLPO is putting out to the public practically encourage any client who [sic] has any problem with their therapist to complain to the College. It is no surprise that the College is receiving a higher volume of complaints and in turn, its costs are increasing. In addition to this, we are very restricted by the College in how we market ourselves. If we have expertise in voice, it is actually in the public's best interest to seek out a voice professional and not another individual who doesn't have the same skill set. The College should be working with its members to identify classes of expertise where it is "legal" so to speak, for such clinicians to refer to themselves as having these [sic] expertise. You could then even make money by having these members pay extra into being allowed to refer to themselves as such."

5. "I also have to question why so much more money is being spent on discipline and complaints - have you considered that instead of investing money advertising to the public about how to complain you might invest that money in providing the profession with more education and training in how to avoid discipline and complaints - customer service training, or training on how to have difficult conversations with families, or whatever issues you see coming up as frequent complaints - give us more information and tools about how to handle and respond to these things so that they don't escalate into major issues that cost you more money to handle."

CASLPO's Response

Like the majority of Colleges in Ontario, CASLPO has increased its public awareness activities. This was driven in part by the government's directions with respect to providing greater transparency and public awareness. These initiatives are part of the College's 3-Year Strategic Plan. This was the first major campaign undertaken by the College since 2002. CASLPO has also partnered with other Colleges through the Federation of Health Regulatory Colleges of Ontario (FHRCO) to produce a public awareness campaign that will be launching in the spring of 2017.

Proposal #4

The annual fee paid by a member in the year of the member's first application shall be prorated according to the **quarter** portion of the year **falling** between the date the certificate of registration is issued and September 30th in the same registration year.

Schedule of Fees and Penalties

All of the following fees are in Canadian funds

Type	Current Amount	Type	Proposed Amount Effective October 1, 2017
<u>Prorated Annual Fee for Initial and General Membership</u>		<u>Prorated Annual Fee for Initial and General Membership</u>	
<i>(Once your application is approved, the annual fee is prorated according to period that you become an initial or general member of the College)</i>		<i>(Once your application is approved, the annual fee is prorated according to quarter that you become an initial or general member of the College)</i>	
Sep 16 to Oct 15	\$728.00	Sep 16 to Dec 15	\$728.00
Oct 16 to Nov 15	\$667.33		
Nov 16 to Dec 15	\$606.67		
Dec 16 to Jan 15	\$546.00	Dec 16 to Mar 15	\$546.00

Jan 16 to Feb 15	\$485.33		
Feb 16 to Mar 15	\$424.67		
Mar 16 to Apr 15	\$364.00	Mar 16 to Jun 15	\$364.00
Apr 16 to May 15	\$303.33		
May 16 to Jun 15	\$242.67		
Jun 16 to Jul 15	\$182.00	Jun 16 to Sep 15	\$182.00
Jul 16 to Aug 15	\$121.33		
Aug 16 to Sep 15	\$60.67		

Response Data:

Do you understand the reasons for the change?

Answer	# of Responses	%
Yes	1046	91.04%
No	103	8.96%
	1149	100%

Do you agree that this change is reasonable

Answer	# of Responses	%
Strongly Agree	135	11.81%
Agree	691	60.45%
Disagree	149	13.04%
Strongly Disagree	168	14.70%
	1143	100%

Comments

6 out of 623 comments (0.9%) were received relating to Proposal #4.

1. "Prorated membership fees quarterly rather than monthly means that individual members are paying for months during which they received NONE of the services or advantages associated with being a CASLPO member. People should not be expected to pay membership fees for months that they were not actually members of CASLPO."
2. "The change in pro-rating by quarter as opposed to by month greatly affects those who may be taking a maternity/paternity leave."
3. "I am not sure I understand the fee per quarter question. This is ok if it is only for the first year. After that I would like to only have one payment per year."

4. "I think the prorated fee for new practicing general members should be an average of the three months lumped together rather than the month with the highest cost associated with it."

CASLPO's Response

The majority of the members who responded feel this change is reasonable and meets CASLPO's objective of easing the administrative burden and streamlining processes.

Proposal #5

Schedule of Fees and Penalties

All of the following fees are in Canadian funds

Type	Current Amount	Proposed Amount <i>Effective October 1, 2017</i>
Application Fee	\$100.00	\$150.00

Response Data:

Do you understand the reasons for the change?

Answer	# of Responses	%
Yes	1034	90.86%
No	104	9.14%
	1138	100%

Do you agree that this change is reasonable

Answer	# of Responses	%
Strongly Agree	106	9.33%
Agree	567	49.91%
Disagree	263	23.15%
Strongly Disagree	200	17.61%
	1136	100%

Comments

28 out of 623 comments (4%) were received relating to Proposal #5.

Frequency of Aggregated Comments Centred on Two Matters:

- The application fee should vary based on the complexity of the applications.
- Canadian applicants should pay a lower fee than international applicants who require more work to process their applications.

Sample Comments

1. "Regarding increasing the initial application fee from \$100 to \$150 because of what you say are increasing costs of processing these applications...then prorate the initial application fee based on the complexity of the application. Make it fair. If someone who graduates from a Canadian or American university applies, their fee should be less than an international applicant, where the complexity of the review that is required for the application is far greater. Why should those whose applications are more simple and straightforward be required to foot the cost for those whose applications are complex? "
2. "If international applications are causing increased amount of administrative costs, please review your processes and determine if changes can be made to make the process more efficient and cost effective. Additionally, I would agree with charging the specific international application higher fees (who are directly benefitting that service) rather than penalizing current, domestic members."
3. "I would suggest maintaining the \$100 application fee for simple, straightforward applications, such as those applying from within Canada/graduated from a Canadian university and increasing the fees for more complex applications such as international applications."
4. "I do not agree with increasing the charges for College application for Canadian university graduates. The requirements of membership are adhered to by graduates from Canadian universities. Perhaps international students need to pay more if the gathering of transcripts, equivalent degrees etc. require further College administrative time."
5. "I would agree with the increase from \$100 to \$150 fee for people wanting to change status etc but I think this increased fee should be accompanied with a more streamlined system for these changes. Where [sic] the committee to review these applications meets more frequently and perhaps more simple reviews of Canadian trained SLPs are reviewed separately from more complex cases of international SLPs. (or whatever makes sense to divide simpler vs more complex cases)."

CASLPO's Response

The College's decision to charge international applicants and domestic applicants the same application fee is to demonstrate fairness and not create a barrier to international applicants. Apart from the CASLPO application fee, international applicants already have additional costs (i.e. credential assessment and document translation costs) that do not apply to domestic applicants.

Proposal #6

The College shall maintain, as a schedule to these By-laws, a list of all fees and penalties which may be charged or imposed by the College.

Schedule of Fees and Penalties

All of the following fees are in Canadian funds

Type	Current Amount <i>Effective October 1, 2016-September 30, 2017</i>
Application Fee	\$100.00
Registration Fee	\$200.00
<u>Annual Fee</u>	
General	\$728.00
Academic	\$728.00
Initial	\$364.00
Non-Practising	\$364.00
Life	\$70.00
<u>Prorated Annual Fee for Initial and General Membership</u>	
<i>(Once your application is approved, the annual fee is prorated according to period that you become an initial or general member of the College)</i>	
Sep 16 to Oct 15	\$728.00
Oct 16 to Nov 15	\$667.33
Nov 16 to Dec 15	\$606.67
Dec 16 to Jan 15	\$546.00
Jan 16 to Feb 15	\$485.33
Feb 16 to Mar 15	\$424.67
Mar 16 to Apr 15	\$364.00
Apr 16 to May 15	\$303.33
May 16 to Jun 15	\$242.67
Jun 16 to Jul 15	\$182.00
Jul 16 to Aug 15	\$121.33
Aug 16 to Sep 15	\$60.67
<u>Penalty fee for late renewal (Payment of an annual fee is also required)</u>	
General	\$145.60
Academic	\$145.60

Initial	\$72.80
Non-Practising	\$72.80
Life	N/A
One month fee adjustment for changes in membership class pursuant to Articles 6.1 and 6.3 of By-Law No. 2011-3	\$30.00
<u>Reinstatement Fee for Suspended Members (Payment of an annual fee is also required)</u>	
General	\$364.00
Academic	\$364.00
Initial	\$182.00
Non-Practising	\$182.00
Life	N/A
Additional or Replacement Wall Certificate	\$50.00
A hardcopy of Membership Card	\$50.00
A hardcopy of Tax Receipt	\$50.00
A letter confirming a member's registration status or payment receipt with the College	\$50.00
The completion of forms from other jurisdictions	\$50.00
A fee may be charged to a member by the College for reminding a member to do something that they are required to do but have failed to do	\$50.00 per reminder
Copying documents from a member's or applicant's file	\$50.00 per request including the first twenty-five pages, and \$1.00 per page thereafter
A hard copy of documents that are available on the College's website	\$50.00

NSF/credit card declined	\$50.00
Request a recount pursuant to Article 5.14 of By-Law No. 2011-1	\$200.00
Certificate of Authorization (Professional Corporation) Application Fee	\$100.00
Certificate of Authorization (Professional Corporation) Registration Fee	\$200.00
Certificate of Authorization (Professional Corporation) Annual Fee	\$500.00
<u>Administrative Fees for Professional Corporations</u>	
Each notice sent by the Registrar for the failure of the corporation to renew its certificate of authorization on time	\$50.00
Replacement certificate of authorization	\$50.00
Issuance of a new certificate of authorization in the event of a name change of the corporation	\$50.00

Response Data:

Do you understand the reasons for the change?

Answer	# of Responses	%	
Yes	1043	92.63%	
No	83	7.37%	
	1126	100%	

Do you agree that this change is reasonable

Answer	# of Responses	%	
Strongly Agree	199	17.82%	
Agree	749	67.05%	84.87%
Disagree	95	8.50%	
Strongly Disagree	74	6.63%	15.13%
	1117	100%	100%

Comments

There were no comments relating to Proposal #7.

Proposal #7

- 2** **PAYMENT OF FEES**
- 2.1** *The fees payable by a member or applicant for registration shall be those fees which are set out in the By-laws of the College, as amended from time to time. **Where no fee or penalty has been set out in the schedule, a member or person shall pay the College the fee or penalty set by the College.***
- 2.2** *Where a person requests the Registrar to do anything that the Registrar is required or authorized to do by statute or regulation, the person shall pay the prescribed fee.*
- 2.3** ***A member's obligation to pay a fee or penalty continues regardless of whether the member fails to receive notice of a fee or penalty.***
- 2.4** ***Any fee or penalty charged or imposed by the College not paid by a member shall be included as part of a member's next annual membership fee.***
- 2.5** ***If a member fails to pay a fee or penalty or part thereof:***
- (a) the Registrar must give the member notice if the College intends to suspend the member; and***
- (b) may suspend the member's certificate of registration for failure to pay the fee or penalty within 30 days after notice is given.***

Response Data:

Do you understand the reasons for the change?

Answer	# of Responses	%
Yes	1027	92.36%
No	85	7.64%
	1112	100%

Do you agree that this change is reasonable

Answer	# of Responses	%	
Strongly Agree	112	10.17%	
Agree	688	62.49%	72.66%
Disagree	192	17.44%	
Strongly Disagree	109	9.90%	27.34%
	1101	100%	100%

Comments

21 out of 623 comments (3%) were received relating to Proposal #7.

Greatest Frequency of Aggregated Comments Centred on Two Matters:

- General support for the proposed change except members feel it is unfair to charge a penalty or fee to a member without providing notice.
- Why suspend a member if the fee is being added to their annual renewal.

Sample Comments

1. "In the payment of fees section you propose that it is a member's obligation to pay a fee "regardless if they got notice of that fee/penalty". That hardly seems right to me. I don't understand how difficult it would be to send a notice that fees are due or outstanding. We spend enough money on membership, the least you could do is send members an email reminding them that fees are due."
2. "I have issue with the added line that notes regardless of a registrant being advised of a fee they are required to pay that fee-I think this is unfair sounds like the College isn't being transparent in their activity. If there is a charge for something I am asking for or the College is doing then they should be VERY clear about the cost of that activity."
3. "Question relating to changes in penalties was too broad. I support parts of it (applying unpaid fees to next year's fee) but not others (fees at the discretion of the College when none are set out, penalizing members for not receiving notification)."
4. "I don't think it's fair and reasonable to charge members fees without notifying them that their requests are fee-for-service. I don't think the fees listed are of themselves overly concerning; I just think we have a right to know that we will be charged and how much we will be charged."
5. "If you say you will add unpaid fees to the next year's membership, then why would you suspend after 30 days of non payment?"

CASLPO's Response

CASLPO attempts to contact members multiple times when a fee or penalty is instituted. If the member fails to provide CASLPO with up to date contact information, it is the member who is responsible for the failure of payment. The wording in the proposed by-law needs to be revised to clarify the current operating procedure.

The section regarding suspensions for non-payment was added to give the Registrar the ability to suspend a member. This ability may be used by the Registrar in extreme circumstances (i.e. non-payment of a discipline order to repay costs in large amounts) where the College wishes repayment to be expedited.

Proposal #8

By-law 2011-3

9 PROFESSIONAL CORPORATIONS

9.1 *The annual fee for a certificate of authorization for a professional corporation shall be paid on January 2nd each year.*

9.2

A professional corporation or a member listed in the College's records as a shareholder of a professional corporation shall pay an administrative fee for each notice sent by the Registrar to the corporation or member for failure of the corporation to renew its certificate of authorization on time. The fee is due within thirty days of the notice being sent.

By-law 2011-5

2 FEES

2.2 *The annual fee for a certificate of authorization for a professional corporation shall be paid on January 2nd each year.*

2.3 ~~*A professional corporation or a member listed in the College's records as a shareholder of a professional corporation shall pay an administrative fee for each notice sent by the Registrar to the corporation or member for failure of the corporation to renew its certificate of authorization on time. The fee is due within thirty days of the notice being sent.*~~

Response Data:

Do you understand the reasons for the change?

Answer	# of Responses	%
Yes	936	86.11%
No	151	13.89%
	1087	100%

Do you agree that this change is reasonable

Answer	# of Responses	%
Strongly Agree	89	8.57%
Agree	776	74.69%
Disagree	109	10.49%
Strongly Disagree	65	6.25%
	1039	100%

Comments

There were no comments relating to Proposal #8.