

Re: CASLPO's proposed fee increases

To:

Debra Zelisko
Yvonne Wyndham
Tina d'Agnillo
Jennifer Anderson
Randi Fisher
Elizabeth Fitzpatrick
Robert (Bob) Kroll
Vicky Papaioannou
Véronique Vaillancourt
Sandi Singbeil
Judith (Judy) Rowland

Copies to:

Brian O'Riordan, Registrar of College of Audiologists and Speech-Language Pathologists of Ontario
Denise Cole, Assistant Deputy Minister - Health Workforce Planning & Regulatory Affairs, Ontario
Ministry of Health & Long-Term Care
Mary Cook, Executive Director of Ontario Association of Speech-Language Pathologists and Audiologists
of Ontario

Dear elected CASLPO Council Members,

As a member of College of Audiologists and Speech Language Pathologists of Ontario, I am writing to you in response to an email received on March 28, 2017 from CASLPO seeking feedback on proposed changes to fees affecting all members of the College. The email stated the following, "The proposed fee adjustments and changes to fees reflect the rising cost of meeting the College's regulatory mandate and strategic goals while addressing increased pressures from the external environment."

This letter is being respectfully submitted to formally express my opposition to a fee increase proposed by the CASLPO.

Comments and data were compiled from contributing members and are summarized in this response. There is resounding agreement that the College is not spending members' dollars judiciously. The availability of Audiology and Speech-Language Pathology Services in the province is not growing at the rate the college is growing and spending as there are increasing numbers of members working part-time and casually due to limited work while paying full membership rates.

There were specific examples of grave concern brought forth.

- Since 2010, 46% increase in fees, approximately 40% increase in staff but only 15% increase in

membership

- 3% increase in membership from 2014 to 2015 yet a 17% increase in expenses including a 12.8% increase in salaries and benefits
- Expenses far exceeding comparable profession - physiotherapy
- Investigation and hearings - highest per case cost of managing complaints/reports of all the colleges in the province, yet it had one of the lowest number of complaints of all the regulated health professions
Comparison – 53 times greater cost per complaint than the College of Physiotherapists of Ontario (CPO)
- CASLPO \$47,525/case; 9 complaints/reports and 2 of those when to hearings and zero went to court
- CPO \$899/case; 233 complaints/reports and 3 went to hearings and 1 went to court
- Occupancy and office administration
- Comparison - based on number of staff, 47% greater than CPO
- Staff salaries and benefits
- Comparison – per staff, 15% higher salary than CPO
- Overall operating cost
- Comparison - per member, 25% greater than CPO
- With sizable increases in fees since 2010, the College has not been able to demonstrate much in the way of a cash reserve.
- The College took it upon itself to undertake a substantial multimedia public education campaign on the benefits of regulation rather than partnering with other colleges through the Federation of Health Regulatory Colleges of Ontario.

RECOMMENDATIONS:

- 1) CASLPO must act responsibly and curb its spending immediately to find ways to achieve efficiencies rather than increase members' fees. Beyond the necessary spending cuts and staff reductions, looking for opportunities in partnering with other colleges; for example, shared accountability among colleges to reduce duplicate or mutually beneficial work.
- 2) Colleges must be more transparent and timely in their reporting.
 - a. Annual reports should not lag behind by two years.
 - b. Stakeholders should be able to readily make cross college comparisons of registration practices, membership, operations costs, quality assurance practices, practice standards and complaints, reports, investigations and hearings.
- 3) Better government oversight over college practices, including spending.
 - a. Expenditure guidelines and limits.
 - b. Consequences to the colleges for excessive expenditures.

As elected representatives of CASLPO, I trust that you will act on behalf of its members and address the above concerns to halt fee increases in coming year.