



## FREQUENTLY ASKED QUESTIONS | *Fee Increases 2021*

**November 3, 2021**

The College anticipates that registrants will have questions and may express concern over the recent announcement that fees for applicants and registrants are increasing as of December 6, 2021.

CSHBC understands and is sensitive to the fact that fee increases are challenging for registrants. The decision to raise fees is not taken lightly and is the result of careful consideration. A majority of CSHBC Board members are also registrants and are thus also affected by the fee increases. Applicants seeking licensure with CSHBC are also impacted by the changes.

In keeping with the College's commitment to fiscal and administrative transparency, and for the benefit of all applicants and registrants, CSHBC offers the following responses to the following anticipated concerns. This document will be updated with any additional frequently asked questions that are posed by applicants and registrants.

### **1. Why is the College raising fees again?**

In early 2017, the College began a five-year period of significant organizational transformation to increase capacity across all streams -- governance, registration, quality assurance and professional practice, inquiry, discipline, information technology infrastructure, and administration – to properly fulfill its public protection mandate under its governing legislation. As these efforts progressed, revenue shortfalls and the risk of deficit positions became persistent concerns. The College posted its first deficit in 2019, another significant deficit is projected for 2022.

In 2018, a more engaged, strategic, and proactive Board, after careful deliberation and in recognition of its regulatory and fiduciary responsibility to the public and government, determined that CSHBC fees were set artificially low, and had essentially been subsidized for a decade at the cost of having an adequately resourced administration and regulatory capacity for the speech and hearing professions in BC. Given the number of years past Boards had postponed *any* fee increases, further inaction was no longer fiscally responsible or tenable. In 2019, several fees were increased for the first time since the College's inception in 2010.

Health profession regulatory colleges such as CSHBC are mandated under the *Health Professions Act* to serve their constituents, the public, to protect patients/clients, and to maintain the public's trust in the professions the colleges regulate. In the past, the College, in maintaining registrant fees that were among the lowest in Canada – while perhaps more palatable to registrants – was not meeting its regulatory mandate.



Since 2017, the College has vastly improved its regulatory capacity, and while a protracted period of significant organizational transformation is nearing an end, some work remains to be done. For example, despite responsible, incremental staff recruitment over the past several years, CSHBC remains relatively understaffed as compared to similarly sized provincial and national regulators, which typically regulate only one or two rather than three professions.

As a not-for-profit, with a single revenue source, CSHBC faces the twin challenges of regulating multiple professions over a small revenue base. The new fee schedule, approved by the College Board and the Ministry of Health, brings the College closer to its required revenue target, and more accurately reflects the true cost of proper regulatory oversight to protect its constituents, the public, for whom the College is mandated to protect by enforcing professional and clinical standards across three professions. The decision was based on an assessment of the College's true business operating costs and revenue required to ensure the College's short- and long-term financial viability, protect its contingency reserves, and eliminate the risk of future deficit positions.

## **2. Are the fee increases to cover costs of the College's office at the BC Regulatory Hub in downtown Vancouver?**

The cost of renting commercial office space obviously contributes to the College's annual expenditures.

In 2017, the entire CSHBC staff complement consisted of two full-time employees, including the Registrar & CEO, and one part-time consultant (2.6 Full-time Equivalent (FTEs) in total), as compared to its audiology and speech-language pathology counterparts in Ontario (15.5 FTEs) and Quebec (20.0 FTEs). This was a completely inadequate and unsustainable number of administrative personnel for managing 1,800 registrants and three professions across an entire province.

Since then, the College's staff complement has increased to 9.2 FTEs employees to manage the College's growing registrant base (approximately 2,000) and core operational areas – including, but not limited to, administration, registration, quality assurance and professional practice, inquiry, and discipline -- and outgrew its then very small office space.

In November 2019, the College relocated to office space in the BC Regulatory Hub in downtown Vancouver, along with ten other regulatory colleges – a necessary move to accommodate additional staff and benefit from certain economies of scale. Four of the College's twelve staff complement (one-third) work remotely and require no office space.

The creation of the BC Regulatory Hub is enthusiastically supported by BC's Ministry of Health and provides a number of operational cost savings. Greater efficiencies include access to shared services and common areas, free board, committee, and staff meeting spaces per the College's lease agreement, a robust firewall, as well as the intangible benefits from collaboration with other regulators.



In BC, all regulators strive to ensure that they are meeting their public protection mandate, while being financially responsible. The increased collaboration between BC regulators through initiatives such as the [BC Health Regulators](#), and the BC Regulatory Hub illustrate this fiscal responsibility.

### **3. Why doesn't the College consult with registrants about fee increases?**

Health profession regulatory colleges are mandated under the *Health Professions Act* to protect the public, not the registrants they license to practice and regulate, by ensuring registrants comply with minimum professional and clinical standards. As such, registrants aren't "members". The College is accountable to the public and the Minister of Health, and it would be inappropriate to seek counsel from registrants about what they believe their fees should be.

This is completely different from professional associations such as Speech-Language & Audiology Canada (SAC) or Speech and Hearing BC (SHBC) that advocate on behalf of a profession, with a mandate to consult with its members on key initiatives. See the [Our Regulatory Role](#) webpage for more information about how regulators differ from professional associations.

### **4. How was the timing of fee increases determined?**

The College appreciates the concern regarding notice of the changes. The approval process for fee increases can take as long as a year, and the College must adhere to Government, Ministry of Health, and fiscal timetables.

Typically, the College's annual budget receives Board approval in the Spring. In 2021, financial analysis was conducted over the Summer, and the proposed increases received Board approval in September, after which the College was required to obtain authorization by the Ministry of Health before providing notice to registrants. The College received Ministry approval in October.

The financial analysis conducted over the Summer by staff and the Finance & Audit Committee (FAC) identified an appropriate revenue target for the College, as well as the fee structure required to reach that target. The Board, supported by the recommendations of the FAC, based their decision to increase fees on this recent assessment of the College's true business operating costs, which calculated the required revenues to fulfill its regulatory role, eliminate future deficit positions, and maintain its contingency reserves.

On September 17, 2021, the CSHBC Board approved the current fee increases, and on October 7, 2021, the Ministry of Health also approved the fee changes, assigning and in force date of December 6, 2021.

Most registrants will not be affected until they renew their registration on or before March 31, 2022. The registration renewal period will open in late January or early February and will run



until the renewal deadline of March 31, 2022. However, registrants changing from Non-practising to Full registration status between December 6, 2021, and March 31, 2022, will need to pay the new, increased Full registration fee.

**5. Why wasn't a long-term plan developed in 2017 or 2019 to address organizational and operational changes?**

Since early 2017, the College has managed an agenda of significant organizational transformation to increase capacity across all business streams -- registration, quality assurance and professional practice, inquiry, discipline, information technology infrastructure, and administration -- to properly regulate its three professions in the public interest as mandated under its governing legislation. Over a five-year period, the College has endeavored to grow at a responsible pace. In 2017, the gaps in capacity were extreme and wide-ranging, and it was impossible to budget for a final organizational design that was yet to be determined. However, after five years of significant operational transformation, the College has vastly improved its regulatory capacity and is close to being able to establish its long-term revenue target.

The new fees, approved by the College Board and the Ministry of Health, make progress towards more accurately reflecting the true cost of proper regulatory oversight to protect the public. The Board based their decision to increase fees on an assessment of the College's true business operating costs, which calculated the required revenues to fulfill its regulatory role, eliminate future deficit positions, and maintain its contingency reserves.

The Board notes that one more similar fee adjustment may be required in the future to attain a stabilized revenue target, not including smaller incremental changes to address cost of living increases and inflation over time.

**6. Can registrants pay their fees or the increase through installments or a payment plan?**

Unfortunately, no. As not-for-profits under the *Health Professions Act*, regulatory colleges, particularly small colleges like CSHBC, cannot operate effectively based on a revenue stream that *might be* forthcoming over the fiscal year. In addition, CSHBC cannot offer what would essentially be a credit scheme for payment of a professional license to practice fee. Accordingly, this means that the College cannot offer registrants anything akin to a "payment plan" option for their licenses to practice throughout the registration cycle.

**7. Are the fee increases to pay for the practice review program?**

The fee increases contribute to the College's entire administration, not just the practice review program. That said, the Board and the College's Quality Assurance & Professional Practice (QAPP) Committee are currently exploring alternate implementation strategies for the professions of speech-language pathology and audiology. More information will be communicated to registrants prior to launching the pilot phase of practice reviews for the profession of speech-language pathology.



**8. Why is the College increasing fees when amalgamation is on the horizon?**

Despite the possibility of amalgamation in the future, the work of regulation must continue. Since the release of the [Government Steering Committee's report](#) in August 2020, colleges proposed for amalgamation under a "Regulatory College of Allied Health Professionals" have received no direction from the Minister or Ministry of Health. Regardless of any work towards amalgamation that may be directed in the future, the College remains a not-for-profit entity created under BC's *Health Professions Act* and must operate on a cost recovery basis to fulfill its regulatory mandate under the law.

**9. I hold more than one professional license -- will I have to pay multiple fees in the future?**

The Board continues to consider enforcing multiple fees for registrants that hold multiple licenses, an option that will, in any case, likely be inevitable if amalgamation happens. If the Board approves a future increase for registrants with multiple licenses, the additional fee will likely only be a proportion of the first registration fee. The College will provide more information as it's available.

**10. Can fee increases be prorated for registrants who work part-time or for only a proportion of the year?**

Unfortunately, no. As a small regulatory college, the College cannot operate effectively based on an aggregate revenue stream that *might be* forthcoming over the fiscal year. The College budgets for activities to effectively regulate its three professions based on registrant competency. This is impacted by the number of registrants on the register, not the number of days each registrant works.

**11. Why is the College increasing the cost of Certified Practice (CP) certification? My employer mandates that I hold a CP certificate. Why is the cost transferred to me?**

Administration of CP certificates and certification requirements are mandated by the Ministry of Health; the College has no say in that. The College's recent activity-based financial analysis proved the true cost of administering CP certificates, another form of licensure, was far more than the current fees provided.

The fee increases for a CP certificate – the first since the College's inception in 2010 – represents a necessary move to improve the regulatory capacity of the College and move administration of certification closer to a cost recovery basis. That said, fees for CP certification remain heavily subsidized and do not reflect the true cost of operating the program.

**12. How can registrants make their concerns regarding the fee increases known to the Board?**



College of Speech and  
Hearing Health Professionals  
of British Columbia

Please send any comments or concerns either in the body of an email, to the CSHBC Board of Directors in care of the Registrar & CEO @ [registrar@cshbc.ca](mailto:registrar@cshbc.ca), or mail a formal letter, addressed to the Board, to the College's mailing address. All emails and letters received from applicants and registrants regarding fee increases will be submitted to the Board.

*The College of Speech and Hearing Health Professionals of British Columbia is the licensing and regulatory body for all audiologists, hearing instrument practitioners, and speech-language pathologists in the province. The College's role is to protect the public by establishing, monitoring, and enforcing standards of qualification, professionalism, and clinical competence across British Columbia.*