



THE
COLLEGE
OF
PHYSICIANS
AND
SURGEONS
OF
ONTARIO

CPSO - Entry to Practice Review:

- Reasonableness of Fees**
 - Efficiency of Decision-Making**
 - Relevance of Residency Training**
-

Submitted to: Office of the Fairness Commissioner

Submitted by: College of Physicians and Surgeons of Ontario

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College of Physicians and Surgeons of Ontario

ENTRY TO PRACTICE REVIEW

Table of Contents

Executive Summary	3 to 9
List of Abbreviations	10
Objectives and Scope	11 to 12
Methodology	13 to 14
Analysis and Findings	
(1) Reasonableness of Fees	15 to 24
Overview of Current Fees	
Fees: Analysis of their Reasonableness	
Fees: Transparency, Objectivity Impartiality and Fairness	
Comparison of Registration Fees of other Canadian MRAs	
Fees Charged by Third-Party Organizations	
Applicants Survey: Feedback on Reasonableness of Fees	
(2) Decision-Making	25 to 40
Overview: Registration Department Decision Making	
Overview: Registration Department Decision Making	
Overview: HPARB Decision Making	
Analysis of Decision-Making Timelines and Efficiency	
Applicants Survey: Feedback on Decision-Making Timelines	
(3) Relevance and Necessity of Residency Training	41 to 48
Overview of Residency Training	
Alternatives to Residency Training	
Applicants Survey: Feedback on Residency Training Requirement	
Recommendations	49 to 55
Reasonableness of Fees	
Efficiency and Timeliness of Decision-Making	
Relevance and Necessity of Residency Training	
Implementation Timelines	56
Statement of Approval	57
Appendices	58
2010 Applicant Survey	
General Results	

Executive Summary

The College of Physicians and Surgeons of Ontario is pleased to complete this “entry-to-practise review” report for submission to the Office of the Fairness Commissioner (OFC).

Unlike registration audits conducted by independent auditors, entry-to-practice reviews are completed by the regulatory body itself. The review requires the regulator to analyse specified aspects of its registration function and make recommendations embodying good practices and advancing transparency, objectivity, impartiality and fairness. A key feature of entry-to-practise reviews is its reliance on input from stakeholders, of which feedback from registration applicants is most important.

Subject Matter of Review as Assigned by OFC

The OFC assigned the following areas for review:

1. *"An analysis of the reasonableness of the fees charged by the regulated profession in respect of registrations. In the analysis it is advisable to include fees charged by third-party assessment agencies as they also impact access to the profession."*
2. *"An analysis of the efficiency and timeliness of decision-making, including decisions related to assessment, registration and appeals"*
3. *"An analysis of the necessity and relevance of the requirements for practical training and or work experience, including any practicum, mentorship, internship or residency."*

Scope of Our Review

The College focused its review of these topics and delineated the scope of its analyses as follows:

1. Reasonableness of Fees

- Our review focused on College registration fees, i.e. the Application fee and the Membership fee, both of which are required prior to registration.
- Our analysis of the reasonableness of fees covered the following:
 - Explanation of the underlying cost-recovery principle of our fees
 - Analysis from the perspectives of transparency, objectivity, impartiality and fairness
 - Comparison of our actual registration costs to our revenues from fees
 - Applicants' feedback on our fees
 - Comparison with other Canadian medical regulatory authorities (MRAs)
 - Third-party organization fees: RCPSC, CFPC, MCC, and CEHPEA
 - Emerging new costs, e.g. PCRC fees

2. Efficiency and Timeliness of Decision-Making

- Our review covered the three levels of decision making occurring within the College's registration process -- Registrar (via delegation to Registration Department), Registration Committee, and HPARB.

- Our analysis of efficiency and timeliness included the following:
 - Description of the decision-making process at each level
 - Description of average timelines
 - Comparison of our timelines with other MRAs
 - Analysis from the perspectives of transparency, objectivity, impartiality and fairness
 - Study of timeliness of registrations in 2010
 - Applicants' feedback on our efficiency and timeliness of decision-making

3. Relevance and Necessity of Residency Requirement

- We narrowed our review of the requirement for "practical training and or work experience" to the College's residency training requirement.
- Our analysis of the relevance and necessity of the residency requirement included the following:
 - Overview of residency training within the larger Canadian system of medical education
 - History of residency training in Canada
 - Rationale and purpose of residency training as a prerequisite to competent independent practice
 - Description of IMG access to residency requirement
 - Description of the roles of RCPSC and CFPC as the national accrediting bodies for residency training and the roles of CaRMS, HFO and CEHPEA for IMGs in Ontario
 - Applicants' feedback on the necessity and relevance of residency
 - Overview of acceptable alternatives to residency requirement

Data Sources

Data sources for our review consisted of the following:

- Survey of 2010 registration applicants
- Registration legislation (RHPA, Medicine Act, regulation, by-laws, policies)
- Current registration practices, processes and policies of the College
- Information and data from RCPSC, CFPC, CEHPEA and MCC
- Survey of other MRAs and comparative analysis
- Internal database query

Key Findings and Recommendations

Our analysis led to fifteen recommendations in relation to the three matters under review. The following section summarizes our findings and recommendations.

Reasonableness of Fees

Our analysis brought forward the following key points regarding the College's fees:

- Our registration fees are based on cost recovery
- The College's costs for registration function exceed its revenues from registration fees
- Our fees are comparable to the fees of other MRAs.

- The large majority of our applicants see our fees as fair and reasonable.
- We apply the same fees to all applicants, and we have no hidden fees or surcharges.
- Our registration fees tend to increase each year, but they do not achieve full cost recovery.
- Fees can be waived by Registration Committee in exceptional circumstances
- Applicants will incur small additional fees, e.g. photograph fee, to complete their application

Recommendations:

On the basis of our analysis we make the following recommendations:

1. Cease applying fee increases to applicants-in-process

Our existing practice is to charge fee increases from the date they take effect and require all applicants-in-process to pay them before they can be registered.

We propose to apply the fee increase only to applications submitted after the effective date of the increase.

2. Enhance transparency of the rationale for our fees

We are fully transparent and proactive in communicating our actual fee amounts and how fees are to be paid, but our website does not contain any background information explaining our cost recovery approach to fees or the comparability of our fees to other Canadian MRAs.

We propose to provide this background information in the registration website.

3. Reduce Unnecessary Incurrence of Incidental Fees

Aside from the regular College registration fees, applicants incur incidental fees in meeting the requirements for photograph, notarization of documents, translations of documents, etc.

We propose to implement guidelines for credentials staff that will encourage them to identify opportunities where applicants can be spared the expense of these incidental fees.

4. Undertake Further Analysis of our Fees Model

The basic model used by the College for its registration fees has remained unchanged for many years. In accordance with College by-laws, every applicant pays two fees, a non-refundable application fee and a membership fee. The fees are the same for all applicants, notwithstanding that some require minimal expenditure of College time and resources while others, particularly those requiring intensive and repeated reviews by Registration Committee, consume a disproportionately large share.

We propose to undertake further analysis of our fees with a view to exploring options that might extend our cost recoveries without creating inequity or impediment to individual applicants or groups of applicants.

Timeliness and Efficiency of our Decision-Making

Our analysis brought forward the following key points regarding our decision-making:

- Our process spans three levels of decision-making with the following average timelines: Registration Dept. (2 to 3 months); Registration Committee (4 to 6 weeks); HPARB (6-12 months).
- The Departmental level consists of three distinct stages: intake; credentialing; approval/issuance. The credentialing stage is significantly longer than the other two.
- The majority of our applicants agree that our decision-making is timely and met their expectations.
- Some survey respondents commented that the process was too long and updates on status of their application were difficult to obtain.
- Survey of other Canadian MRAs shows that our timelines are comparable to theirs.
- Our decision-making adheres to principles of transparency, objectivity, impartiality and fairness.
- Our study of the registration issuance date of the 2010 July 1 cohort of educational applicants (N=1294) showed that 93% were licensed on time to start their training program.

Recommendations:

On the basis of our analysis we make the following recommendations:

5. Develop an on-line facility for application status checks

Registration applications and guidance are freely available from the College's website, but we do not offer any online functionality to assist applications-in-process. In particular, we have no online facility for applicants to check the status and progress of their applications prior to registration.

All applications have trailing documents arriving at different times, and it is imperative that applicants keep up to date on which have arrived or are still outstanding. Consequently, the Registration Department receives a very large number of status inquiries from applicants.

Nearly all these inquiries are in the form of telephone calls, which can lead to long waits in the telephone queue and frequent callbacks. We intend to address this inefficiency by developing an online application status check. Such an enhancement will eliminate thousands of telephone calls and bring major time savings for staff and applicants.

6. Expand Guidance in Website on Application Process and Timelines

Our website provides prospective applicants with general information on application timelines, and further specifics are provided in the application forms. However, feedback from applicants suggests that more guidance is required.

We propose to enhance our website by providing more flowcharts and directions to relevant policies, more tips to avoid delays, and further explanation of timelines.

7. Expand Use of Physician Credentials Registry of Canada (PCRC)

The College intends to making increasing use of PCRC services.

PCRC provides a credentials verification service on behalf of the Canadian MRAs as well as the MCC, RCPSC and CFPC. Once applicants complete the PCRC process, their source-verified credentials are stored in PCRC's repository. Afterwards, they can be easily shared with whichever MRAs the applicant requests. This reduces duplication of credentialing effort and boosts efficiency and timeliness of the process.

8. Participate in Initiative for National Application Form

FMRAC and the MCC are partnering on development of a common application form to be used by registration applicants across Canada. Applicants will access the form and complete it online through a national portal based at PCRC.

The form will automatically populate with credentials data drawn from the PCRC repository and be transmitted to the province where the applicant intends to apply. The goal of the project is to reduce redundancy for applicants by having them complete just one basic form that can be used across Canada and, also, to reduce duplication among MRAs of credentialing of applicants' basic credentials.

The College intends to continue its support and participation in development of the national application. We see in this initiative excellent potential for increasing the efficiency and timeliness of the registration process.

9. Registration Committee Process Enhancements

Feedback from our survey of our 2010 applicants on Registration Committee timeliness and efficiency was generally positive, and it assisted us in identifying two recommendations for enhancing the Registration Committee process.

First, we propose to improve transparency of the unscheduled, interim meetings of the Registration Committee. These meetings occur on an as-needed basis between regularly scheduled meetings and deal with straightforward cases under our simpler registration policies. However, unlike the regular meetings, interim meeting dates are not made public nor is there any mention of them in the website. We intend to add a general message in the website about these interim meetings and, to the degree possible, notify applicants in advance of their inclusion in the meetings.

Second, we intend to increase accessibility of staff for responding to inquiries from Registration Committee applicants. Feedback from these applicants suggests this aspect of our service could be improved.

10. Future Regulation Amendment to Improve Efficiency

The College has implemented a number of registration policies that recognize alternative qualifications to those set out in our registration regulation under the *Medicine Act*. However, all of these policy cases must be referred to the Registration Committee, even the most straightforward of them. This is a drawback from the standpoint of timeliness and efficiency of decision-making.

The College intends to amend its registration regulation in the future. This regulatory change will not only incorporate major initiatives such as the national standards for full and provisional licensure, it will also incorporate capture registration policies so that can be safely administered at the Registration Department level of decision-making. Decision-making timelines on such applications will become much shorter.

11. Conduct Applicants Focus Groups

As an extension of our 2010 applicants' survey, we propose to hold focus groups of applicants, as well as other stakeholders. These sessions will further our understanding of applicants' perspectives on our decision-making process and guide our efforts and choices for improvements to timeliness and efficiency.

12. Registration Service Pledge

As outward evidence of our commitment to service and efficient process, we propose to post to the website our registration "service pledge." This will be a statement reflecting our registration service standards, values, and expectations of ourselves and our applicants.

Relevance and Necessity of Residency Requirement

Our analysis brought forward the following key points regarding our residency requirement:

- Every Canadian medical school graduate needs residency training to attain the standard for safe and competent independent practice.
- Successful completion of residency is implicit in the College's regulatory requirements for an independent practice certificate.
- Canadian residency programs must be accredited by the national specialty examining bodies, the RCPSC and CFPC.
- In Canada, completion of residency became an integral part of physicians' training beginning in the late 1800s, with university-affiliated programs becoming the norm in 1975.
- In reviewing appeals relating to the residency requirement, HPARB has expressed agreement with the reasonableness of residency training as part of the standard, objective requirements for independent practice.
- In Ontario, IMGs apply through CaRMs for access to residency programs. Since the 1990s, the number of government-funded residency positions reserved for IMGs has increased to over 200.
- HFO and CEHPEA are key support organizations for IMGs in Ontario providing invaluable assistance in counseling and evaluating readiness to enter residency.
- In its commitment to finding alternatives to the traditional residency route to independent practice, the College has introduced pathways and policies recognizing other examinations and practice-assessment based means of assessing competence.
- RCPSC and CFPC recognize IMGs' importance in Canada and offer alternatives to completion of Canadian residency and access to the certification examinations.
- In connection with AIT (Agreement on Internal Trade) FMRAC has developed a new national agreement setting out national standards for full licensure. The standard requires RCPSC or CFPC certification but does not explicitly require completion of an RCPSC or CFPC accredited residency, thus leaving open the option for alternative pathways.

Recommendations:

On the basis of our analysis we make the following recommendations:

13. Maintain and Enhance Existing College Policy Alternatives and Pathways

Hundreds of IMGs have benefited from the College's pathways and policies offering alternatives to the traditional Canadian residency route to independent practice.

The College recommends maintaining these pathways and policies, while modifying or extending them to capitalize on new initiatives and developments happening at the RCPSC, CFPC and national level.

14. Continue PRTF and Collaborative Efforts to Address Physician Resources

The Physicians Resource Task Force is the multi-stakeholder forum in Ontario for finding solutions to physician resource challenges without compromising standards. Initiatives and recommendations associated with the PRTF since 2002, many of which bear directly or indirectly on the residency requirement, have produced the net benefit of assisting thousands of IMGs towards registration for medical practice in Ontario.

The College recommends continuing the PRTF and its leadership role in this important forum.

15. AIT and Implementing National Standard for Full Licensure at the Regulatory Level

Ontario legislation was passed in 2009 (the Labour Mobility Act) in relation to the AIT (Agreement on Internal Trade). This legislation entitles physicians holding a licence elsewhere in Canada to obtain an equivalent licence in Ontario, irrespective of whether they have completed a residency program in Canada and obtained RCPSC or CFPC certification.

Also, in connection with AIT, FMRAC developed a new national agreement, "FMRAC Agreement on National Standards" setting out the national standards for full and provisional licensure. The FMRAC standards on full licensure were formally adopted by the College's Council last year.

The national standard for full licensure includes the requirement for RCPSC or CFPC certification. Implicit in the certification requirement is completion of an RCPSC or CFPC accredited residency as the regular route leading to the certification examination. This points to its continuing necessity and relevance in the context of full licensure.

On the other hand, because the national standard for RCPSC or CFPC certification does not explicitly require completion of an RCPSC or CFPC accredited residency, it opens the way for alternative pathways leading to the certification. This accords with the College's long-standing acceptance of alternative pathways that do not compromise competent and safe practice.

Last year the College's Council adopted the national standard for full licensure as the standard for independent practice registration in Ontario, and amended or rescinded several existing registration in keeping with the standard. As a party to the agreement, the College must adhere to the national standard and cannot make substantive changes to it without agreement of FMRAC.

To complete the process of implementation of the standard, the Council needs to amend the registration regulation, since the standard set out in the regulation is still the legal standard in the province and differs slightly from the national standard.

The College proposes to amend the regulation to incorporate the national standard for full licensure.

List of Abbreviations

CEHPEA	Centre for the Evaluation of Health Professionals Educated Abroad
CFPC	College of Family Physicians of Canada
FMRAC	Federation of Medical Regulatory Authorities of Canada
HPARB	Health Professions Appeal and Review Board (Ontario)
MCC	Medical Council of Canada
MRAs	The provincial and territorial medical regulatory authorities in Canada
OFC	Office of Fairness Commissioner (Ontario)
PCRC	Physicians Credentials Registry of Canada
RCPSC	Royal College of Physicians and Surgeons of Canada
PRTF	Physicians Resource Task Force
RHPA	Regulated Health Professions Act (Ontario)
RHPA Code	RHPA Health Professions Procedural Code

Objectives and Scope

General Scope and Objective of Review

The Fairness Commissioner has asked the College to conduct an entry-to-practise review, in accordance with section 22.6(1) of the RHPA Code.

The general scope and objective of the review accords with s. 22.6(2) and consists of the following three items specified by the Fairness Commissioner:

1. Reasonableness of Fees

"An analysis of the reasonableness of the fees charged by the regulated profession in respect of registrations. In the analysis it is advisable to include fees charged by third-party assessment agencies as they also impact access to the profession."

2. Efficiency and Timeliness of Decision-Making

"An analysis of the efficiency and timeliness of decision-making, including decisions related to assessment, registration and appeals"

3. Relevance and Necessity of Residency Training

"An analysis of the necessity and relevance of the requirements for practical training and or work experience, including any practicum, mentorship, internship or residency."

Specific Scopes

In reviewing each of the three general areas above, we will focus on the aspects that are of particular relevance to this College and its stakeholders (primarily our applicants) and afford us data for recommendations for enhancements and changes that will promote best practices and advance fairness.

Our specific scopes of review for each of the topics are as follows:

1. Reasonableness of Fees

- Focus on College registration fees, i.e. the Application fee and the Membership fee, both of which are required prior to registration.
- Explain the underlying cost-recovery principle of our registration fees and analyze our fees from the perspectives of transparency, objectivity, impartiality and fairness.
- Undertake an analysis of actual costs incurred by the College to operate its registration process and compare to registration fee revenues.
- Describe applicants' views on our fees, as obtained through our survey of 2010 applicants.
- Compare our fees with those charged by other Canadian medical regulatory authorities
- Set out the fees charged by our third-party organizations, namely, RCPSC, CFPC, MCC, and CEHPEA.
- Comment on PCRC fees as an emerging new cost.
- Identify opportunities for enhancements and implementation timeline for these changes.

2. Timeliness of Decision-Making

- Describe College registration decision-making at each level – Registrar, Registration Committee, and HPARB.
- Focus our analysis on the Registrar (i.e. Registration Department) and Registration Committee levels.
- Describe the process and timelines of each decision-making level.
- Compare our timelines with other MRAs.
- Describe applicants' views on our timeliness, as obtained through our survey of 2010 applicants.
- Analyze the decision-making process from the perspectives of transparency, objectivity, impartiality and fairness.
- Analyze efficiency of the process.
- Identify opportunities for improvements in efficiency and timeliness with an implementation timeline.

3. Relevance and Necessity of Residency Training

- Review will focus primarily on the College's postgraduate training requirement, and in particular, the Canadian residency requirement and its standards.
- Analyze the necessity and relevance of residency training for the purpose of qualifying for College registration.
- Explain how Canadian residency training fits within the larger Canadian system of medical education and examinations and why it is a prerequisite to competent independent practice.
- Describe the role and standards of the national accrediting bodies (RCPSC and CFPC) for Canadian residency training.
- Describe the roles of CEHPEA and MCC within the larger Ontario and Canadian postgraduate training and examining system.
- Explain existing College registration policies and pathways that offer alternatives to the regular residency requirement.
- Describe accommodations made specifically for IMGs with respect to this requirement.
- Analyze the College's residency training requirement from the perspectives of transparency, objectivity, impartiality and fairness.
- Set out recommendations based on the analysis.

Governance

The review team for this report consisted of staff from the Registration Department and Registration Committee Support Department in the College's Quality Management Division. The review team was led by the manager in each of these two departments with contribution and assistance from the supervisors and staff of the Inquiries and Credentials sections in the Registration Department.

Key technical assistance, tabulation and guidance on the College's survey of 2010 applicants was provided by staff in the Research and Evaluation Department in the College's Quality Management Division.

Oversight of the review provided by the Director of the Quality Management Division.

Certification of the required contents and accuracy of the report provided by the Registrar.

Data Sources

Data sources for the review are as follows:

- Applicant survey (see below for details)
- Existing internal practices and policies
- Relevant by-laws, regulations and statutes
- Registration Committee process and decisions
- HPARB process and decisions
- Information and data from RCPSC, CFPC, CEHPEA and MCC
- Survey of other MRAs and comparative analysis
- Internal database queries
- Internal cost/revenue data for registration

Review Period

Preliminary planning for the review began in early fall of 2010. The survey of applicants was conducted in December. Additional data gathering, analysis, and compilation of the report was carried out from December 2010 through February 2011.

Applicant Survey

Last fall the College conducted a survey of all applicants who obtained registration in 2010 (total of 3230 applicants).

The survey contained thirty-three questions covering key aspects of the College's registration process. Several of the questions were designed specifically to inform this review. The responses to these questions form an important data source for our analyses. The complete survey and general results are presented in appendix 1.

Here is a brief overview of the respondent frame and response rate:

- Survey sent to 3230 applicants who obtained registration during the period between January 1 and November 15, 2010.
- Total number of completed surveys returned: 765 (24% response rate)
 - Response rate by source of medical degree:

▪ Ontario medical school	230	(30% of 765)
▪ Other Canadian	92	(12%)
▪ USA	15	(2%)
▪ International (IMGs)	428	(56%)
- The response rate of 24% was sufficient for us to have confidence in the representativeness of the responses for our entire applicant population.
- The response rate across the categories (Ontario, IMG etc.) was fairly proportionate to the actual distribution of applicants each year. The main difference was that IMGs were a little over-represented and Ontario graduates a little under-represented in the response rate.

The survey provided opportunity to write comments and 299 respondents left at least one comment. The section of questions relating to the our processing of applications generated the highest of comments, with 137 respondents providing a comment.

Analysis of each of the three topics is presented in turn:

1. Reasonableness of Fees
 2. Efficiency and Timeliness of Decision-Making
 3. Relevance and Necessity of Residency Training
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1. REASONABLENESS OF FEES

"An analysis of the reasonableness of the fees charged by the regulated profession in respect of registrations. In the analysis it is advisable to include fees charged by third-party assessment agencies as they also impact access to the profession."

Overview of Current Fees

Application Fee and Membership Fee

When applying for a certificate of registration, applicants are required to pay both an application fee and a membership fee as part of the regular requirements for registration.

Except for the Postgraduate Education and Short Duration classes of registration, fee amounts are the same for all classes (Independent Practice, Academic Practice, Academic Visitor and Restricted classes).

Regardless of certificate class, payment of fees is always required before the certificate can be issued. Every applicant is required to pay both the application fee and membership Fee (except for the Short Duration class which does not require the Membership Fee). The membership fee paid by applicants is the same membership fee paid annually to maintain membership.

Criminal Record Check Fee and Audit Recovery Fee

In addition to the application and membership fees, two other fees must be paid upon application.

One is the criminal record check fee, and is required to offset College costs for running a criminal record screen on behalf of the applicant. The other is to offset College costs for the registration audit and other fair practices activities required by provincial legislation.

These two fees are applied to all applicants. Because they are relatively small amounts, they appear as part of the total application fee, but clarification of them as separate fees is mentioned in the application instructions.

Current Fee Amounts (as of Jan. 1, 2011)

Full Independent Class (and all other classes except Postgraduate Education and Short Duration):

Application Fee	\$716
Membership Fee	\$1410
Total fee	\$2126

Postgraduate Education:

Application Fee	\$152
Membership Fee	\$282
Total Fee:	\$434

Short Duration:

Application Fee	\$293
Membership Fee	nil
Total Fee	\$293

Statutory Authority for Charging Fees

Section 94 of the RHPA Code permits the College's Council to make by-laws requiring payment of fees upon application for a certificate of registration and specifying the amount of those fees.

Setting Fees

The College has a Fees By-law specifying the fee amounts. The By-law uses a formula whereby the individual fee amounts are based on a fixed percentage of the general membership fee. For example, for application fees, the Postgraduate Education application fee is 10% of the general membership fee, Short Duration is 20%, and all other classes is 50%.

The amount of the membership fee for the next membership year is decided upon by Council. If Council approves an amendment to the amount, the proposed by-law is circulated to the membership and afterwards ratified by Council.

Fees History

The current fee model for registration, consisting of an application fee and membership fee payable upon application, has been in place since the College was formed in the 1860s. The names and amounts of the fees have changed over time, but the basic approach of a fee for the registration application and a separate fee for membership has not changed.

There have been periods of time during which the fee amounts varied depending on graduation from an Ontario, Canadian or international medical school, but this variance was last seen and eliminated during the 1980s. Historically, the application fee was much higher than the membership fee, but this has reversed over the past few decades.

Fees: Analysis of their Reasonableness

What is the Rationale for the College's Fees?

The key principle behind the College's registration fees is cost recovery.

The application fee is meant to defray the College's administrative costs in registering applicants. All segments of the registration process -- registration inquiries, credentialing, and registration committee -- incur significant costs in staffing, materials, equipment, postage, etc, and the application fee is intended to offset them, if not entirely recover them.

A second principle implicit in College registration fees is that of user-pay. In other words, the primary users and beneficiaries of the registration system -- the applicants -- should bear the bulk of the cost, as opposed to the general membership of the College bearing the cost.

As noted above, each applicant is required to pay an application fee and membership fee, but it is the application fee through which the College applies its user pay and cost recovery costing model. The membership fees collected from each applicant are added to those collected annually from the rest of the membership to fund overall College operations and overhead.

Does Application Fee Revenue Meet or Exceed Cost Recovery?

Using 2009 year-end financial data (2010 year-end data is not yet available), a comparison of application fees revenues with operational costs shows that the College is underachieving with respect to cost recovery. Revenue from application fees in 2009 showed a shortfall of 38% in terms of fully funding registration costs.

2009 CPSO Registration Cost/Revenue Comparison			
Costs for CPSO Registration Process		Revenue from Application Fees	
Registration Cost Centers (costs rounded)	<ul style="list-style-type: none"> • Reg. Com'ttee & Support (\$850,000) • Reg. Inquiries (\$200,000) • Reg. Credentialing (\$700,000) • Reg. Admin (\$100,000) 	Application Fee Types	<ul style="list-style-type: none"> • Postgrad. Education: (1923 x \$156 = \$299,559) • All Other Classes: (1540 x \$676 = \$1,041,415)
Total	\$1,850,000	Total	\$1,340,974
Surplus / Shortfall:	Shortfall: Costs exceeded application revenue by \$509,026 (38%)		

Source: CPSO 2009 Year-end Financial Statements

