



College of  
Massage  
Therapists of  
Ontario

## College of Massage Therapists of Ontario

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June 10, 2022

Michael Feraday  
Executive Director and Chief Executive Officer  
Registered Massage Therapists' Association of Ontario (RMTAO)  
1243 Islington Avenue  
Toronto, ON M8X 1Y9

Dear Michael,

Thank you for your May 26, 2022 letter, providing feedback on CMTO's By-Law No.7 Fees consultation. CMTO recognizes that fees impact RMTs and does not take fee proposals lightly. We have responded to the points raised below.

As you are aware, CMTO is required by legislation to conduct various regulatory processes – registration, quality assurance, investigations and hearings – in the public interest. CMTO fees are directly related to these legislated obligations. Regulated health colleges are also held to high levels of financial transparency as part of their accountability to government. CMTO publishes annual audited financial statements, an overview of how registration fees are spent, a detailed College Performance Measurement Framework report, annual budgets and quarterly public financial statements.

Your main concern is the fee increase and you have noted that a similar rationale was provided when fees were last increased in 2019. We would agree that the rationale is similar. However, this year differs from 2019 in that all organizations are facing increased costs across the board due to inflation. In addition, over the past three years, the volume of sexual abuse matters has increased but fees have only risen by \$12. CMTO recognized the impact of fee increases on the profession over the COVID-19 pandemic and was able to avoid or limit fee increases. However, this is no longer sustainable given sexual abuse matters result in complex, higher-cost investigations and hearings. Going forward, CMTO is committed to working with health system partners, including RMTAO, to develop strategies to prevent sexual abuse.

Your second concern relates to the proposed by-law amendment that would allow fee increases of up to \$75 on an annual basis. You have requested that future fee increases remain tied to inflation. In making this request, you have suggested that this would be sufficient to address the deficit and future costs. CMTO is also hopeful that fee increases above inflation, which is currently high, will not be required. However, as set out in the analysis provided to Council, it is our view that to fulfil our legislative responsibilities, eliminate the current deficit, and adhere to our financial reserve policy (as expected by government), fee increases will be required. Our goal is to plan for smaller, annual fee increases, so there is more predictability for future planning, and registrants will know what to expect.

For future years (2024 and onward), CMTO's budgetary needs and proposed fee increases will be assessed each year based on current economic factors and supported by further analysis. The by-law gives CMTO the flexibility to raise fees up to \$75 only if required. As noted in your letter, registrant



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
numbers have an impact on revenue. While CMTO is hopeful that there will be stable and consistent growth, this is offset by those leaving the profession, which is difficult to predict. As a result, CMTO has been deliberately conservative in this regard. The impact of registrant growth on CMTO revenue will be considered as part of any discussion of future fees.

Your third concern relates to the proposed Inactive Certificate fee increase. By raising the Inactive fee, CMTO is spreading costs across the profession, instead of just General Certificate holders. Keeping in mind that 11 Ontario health colleges do not have an Inactive class, CMTO believes that keeping the Inactive Certificate option continues to provide a substantial discount to multiple types of registrants who are not practising.

Thank you again for your feedback on CMTO's proposed fee increase. Your letter will be provided to Council as part of the continuing fee discussion. CMTO has also received over 1,600 responses to its consultation survey to-date. Once the consultation closes on July 19, 2022, feedback will be summarized, posted to our website and provided to Council as it considers next steps. In the meantime, CMTO will answer some of the top questions we have received in FAQs that will be posted on the website.

We appreciate RMTAO's feedback on behalf of RMTs and look forward to working together as CMTO fulfils its public interest mandate.

Yours truly,

DocuSigned by:  
  
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Maureen Boon, Registrar | CEO

C: Kim Westfall-Connor, RMT, LLM

C: Ian Kamm, RMT, Board Chair, RMTAO