



Registered Massage Therapists'  
Association of Ontario

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May 26, 2022

Kim Westfall-Connor, RMT  
President, CMTO Council  
College of Massage Therapists of Ontario  
1867 Yonge Street, Suite 810  
Toronto, Ontario  
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Dear Ms. Westfall-Connor,

The Registered Massage Therapists' Association of Ontario (RMTAO) is writing to express our concern about the proposed fee increase to CMTO registration fees and associated by-law change proposal presented to the CMTO Council on May 9, 2022. While we understand the importance of financial prudence, this substantial and persistent fee increase represents a significant financial burden for our members.

Similar justifications for a fee increase, namely the number and complexity of investigations and discipline hearings, the need for a new quality insurance program to meet legislative requirements, and the need to increase CMTO staff, were used when the CMTO last significantly increased fees in 2019. However, it appears that there has not been adequate improvement in those areas since the last fee increase, resulting in another significant fee increase. As the same issues that justify the current CMTO fee increase were identified in 2019, there is doubt that the CMTO cost reduction strategies will prevent the burden of significant fee increases on an annual basis going forward.

Our largest concern is the proposed amendment to By-Law 7 which would allow fee increases of up to \$75 on an annual basis going forward. This is not based on the current situation as outlined or any future projection of necessity. The RMTAO requests that By-Law 7 remain as stating that fees cannot be raised by more than the rate of inflation. Based on the numbers provided by the CMTO and historical patterns, raising the fees by the rate of inflation should adequately cover the proposed deficit and result in a net revenue surplus. It is safe to assume that there will also be an increase in registrants as the number of new registrants was artificially kept very small due to pandemic limitations on the testing of new graduates. This was not considered in the CMTO's proposal but there is no reason to believe that the number of registrants will not increase now that pandemic restrictions to entry-to-practice testing have ended. Even a modest 2% increase would mean an improvement of almost \$250,000 in revenues in registration fees alone.

The forecasted deficit for 2022 is approximately \$730,000 and the proposed changes to fees and reduction in costs would result in a drastically higher net improvement in the financial position of the College of almost \$3 million dollars over three years. This is a far greater amount than the College has indicated they need to meet their financial and regulatory obligations, and represents an excessive overreach not supported by increases in expenses or any other data provided. Raising fees by the rate of inflation would also result in a net improvement of the financial position of the College within acceptable parameters. An increase of the magnitude proposed should only be considered as a last resort given the expected hardship it will impose on the profession.

We are also concerned with the arguments used to justify the increase in Inactive Registration fees of over 100% to make it half the cost of the active fee. The CMTO's benchmarking indicated that the range for Inactive Registration fees in other professions was between 13% and 85% of the Active Registration fee. The previous CMTO Inactive Registration was about 25% of the active registration fee, so this alone does not justify increasing the fee by over 100% in a single year. The other argument made for the Inactive fee increase was that the CMTO believes that people are using the Inactive registration category incorrectly. If the CMTO is concerned with the reasons registrants choose Inactive Registration, they should consider changing the requirements for that registration status rather than implementing a punitive fee increase.

The RMTAO understands the difficult financial position of CMTO and the need for financial prudence. However, the proposed fee increases will pose a significant burden on our members, which will lead to some RMTs leaving the profession, leaving others in a much more precarious financial position which can impact their ability to offer care to patients. In addition, the proposed change to allow fee increases of up to \$75 every year indefinitely is an overreach not supported by any data the CMTO has provided. By accounting for a modest increase in registrants now that regular entry-to-practice exams have resumed, it's clear that fee increases based on the current rate of inflation would be adequate.

Based on this, we request to limit changes in fees to the rate of inflation, as previously outlined in By-Law 7, as we have found that this would be sufficient to return the CMTO to a revenue surplus, and the issues outlined, which are the same as the issues used to justify the significant fee increase three years ago, cannot adequately justify the burden this will place on Registered Massage Therapists in Ontario.

The RMTAO looks forward to further discussing our responses to this proposal with the CMTO.

Sincerely,



Michael Feraday  
Executive Director and Chief Executive Officer  
Registered Massage Therapists' Association of Ontario

C: Maureen Boon, Registrar, CMTO  
C: Ian Kamm, Board Chair, RMTAO