



## Entry to Practice Review

### Fees

#### Executive Summary

This review was conducted primarily by Evelyn Waters, Deputy Registrar, who oversees the registration process at the College of Dental Hygienists of Ontario (CDHO). Feedback was provided by other staff members involved in the process. For example, Fran Richardson, Registrar, who oversees the implementation of the clinical competency evaluation (CCE) provided input into the reasonableness of the fees for the CCE. Mary Catalfo, Director of Administrative Services, provided input on the reasonableness of the certificate of registration fee in terms of budgetary implications. No recommendations to change fees were made as a result of this review.

#### Objective and scope

The objective of the review was to determine if the fees charged to applicants by the CDHO were reasonable. Do the fees cause undue hardship for applicants? Are the fees higher than the cost of providing the service? Are the fees higher than those charged for comparable services by other regulators? Are there measures in place to ensure that fees charged by qualifications assessors are reasonable? It was agreed that a summary analysis rather than an in-depth analysis be conducted as the CDHO had conducted a complete review of its bylaws, which includes the section relating to all CDHO fees in 2008 and a more specific review in 2010.

#### Methodology and Background information

Each fee was reviewed on its own to determine whether it is reasonable. Information obtained during the CDHO bylaw review and audit process was used to assist in determining the reasonableness of fees.

In 2008, in anticipation of the changes that would occur on June 4, 2009 as a result of the enactment of the *Health System Improvements Act, 2007*, an Ad Hoc Committee called the Regulations and Bylaws Committee was established to perform a complete review of the bylaws. The entry to practise fees, listed in the bylaws, were included in this review. At their October 2008 meeting, members of Council approved circulation of the draft bylaws to registrants and stakeholders for the requisite 60 day period. The draft was also posted on the CDHO website. All comments were considered by the Committee and adjustments made where applicable. The majority of comments were positive regarding the suggested changes. No comments were received respecting proposed changes to the fees nor were there any comments asking for changes to the fees.

In 2010, the Executive Committee again reviewed the bylaws, including the section relating to fees. Some changes were made to the fee structure. For example, the Registrants' Handbook has been replaced by the Registrant's Resource data stick. Therefore, the Executive Committee recommended that the replacement fee be changed from \$60 for the Handbook to \$15 for the data stick. Where possible, the CDHO sets its fees on a cost recovery basis.

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In 2009, the Office of the Fairness Commissioner required the CDHO to undergo a compliance audit to ensure that its registration practices were transparent, objective, impartial and fair. No major recommendations were made or areas of concern identified. As part of the process, the auditors surveyed 95 recent registrants, randomly selected, and asked a number of questions related to their application experience. One question related to whether the applicant was aware of the total costs that they may expect to incur to complete the process and another asked whether they were aware of the fees for each stage of the process. At the end of these questions, there was space for any additional comments that the registrant/applicant wanted to make related to these questions. 42 completed surveys were returned and no comments were made with respect to fees.

The CDHO Council has always been cognizant of the financial burden placed on applicants for registration and this has been reflected in the changes to fees that have been made over the years. These changes will be addressed in the review of each particular fee. The members of the Executive Committee, acting on behalf of Council, review the reasonableness of fees in conjunction with their annual review of the budget.

#### **Recommendations**

At the end of the review, it was determined that the current fees were reasonable and no recommendations to either increase or decrease the fees were proposed. It was agreed that fees in general should continue to be reviewed on an annual basis by the Executive Committee.

#### **Implementation Plan**

On an annual basis, when reviewing the budget, the Executive Committee, on behalf of Council, continue to review all CDHO fees and make recommendations to Council regarding fee changes as appropriate.

#### **Statement of Approval**

Once the review was completed, it was circulated to a Panel of the 2010 Registration Committee for approval. The result of this review will be reported to Council at its May 2011 meeting for information.

I, Evelyn Waters, certify that the information presented with respect to this review is accurate.



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Evelyn Waters, B.A.  
Deputy Registrar