



NLCHP

NEWFOUNDLAND AND LABRADOR
COUNCIL OF HEALTH PROFESSIONALS

Registration Fee Increase – Questions and Responses

1. How were the fees increases approved?

The NLCHP is governed by a board which includes representatives of each of the Health Professional Colleges governed under the Health Professions Act who are elected members of their College and six public members appointed by the Government of NL Independent Appointments Commission. All Council members are volunteers.

The Council has four standing Committees including Registration, Complaints Authorization, Quality Assurance and Finance/HR. The Finance/HR Committee is chaired by a public member of the NLCHP and includes representatives from the health professions and other public members of the NLCHP. While the Registrar of the NLCHP attends the meetings of the Finance/HR Committee, neither the Registrar nor the NLCHP staff have voting power within any of the Committees.

The Finance/HR Committee reviews the finances of the NLCHP regularly. The certainty of a deficit for 2019-20 and into 2020-21 was discussed in October of 2019 and a study of the need for a fee increase was commenced by the Finance Committee. After careful review, the Finance/HR Committee recommended the implementation of the fee increase. The recommendations of the Finance Committee were then presented to Council for final approval. The fee increases were approved by all members of the Council without objection, including Council members representing health professional colleges, at the meeting of the Council.

2. Why are fees being increased now?

As a not-for-profit regulatory authority created by Government under the Health Professions Act, the NLCHP is funded almost entirely by registration fees. Fees have not been increased since the first health professionals were registered in 2012.

In 2019-2020, the NLCHP experienced a significant deficit of \$246,586. There were a number of factors which contributed to this many of which were expected.

The most significant contributor was the movement to a common registration date for all health professionals. This allowed us to optimize the online registration system and allow time throughout the year for the NLCHP staff to focus on other priorities. It also allowed the health professional colleges to align their continuing education and work hour requirements for renewal to a calendar year. Previously some registrants were submitting documents for the previous fiscal year which did not align with the renewal period. The change in registration renewal resulted in many registrants having a shorter registration renewal period and prorated fees. Because of this, our registration revenues during the 2019-2020 fiscal year were down by \$179,464 from the previous fiscal year (\$236,922 vs. \$416,386). In the current 2020-21 fiscal year, the NLCHP will have a full year of registration revenue from all of the professions it regulates.

The NLCHP's expenses increased by \$81,867 from the fiscal year ended March 31, 2019. This increase is largely attributable to increased costs in three key areas: (i) necessary information technology investments in an online registration platform and database; (ii) salaries and wages of the NLCHP staff, in particular due to the need at various times in 2019-2020 to have temporary staff to meet workload requirements; and (iii) legal fees associated with an increase in allegations and registration issues affecting certain registrants.

Over the last number of years, investments have had to be made in the technology infrastructure of the NLCHP, including upgrades to computer systems and moving towards an online registration system and database which was substantially complete in 2019-2020. Prior to the acquisition of these technologies, the NLCHP had a manual, paper-based system for registration and renewals that was not appropriate for a regulator of more than 1,100 health professionals across 7 different health professions. At the time these investments were made, it was also anticipated that by now the Medical Radiation Technologists would have joined the NLCHP and the information technology improvements were also needed to ensure capacity for this and other groups to join.

The installation and transition to the new database took a significant amount of dedicated time by the NLCHP staff. As registration renewals for the various health professional groups were ongoing throughout the year, the NLCHP contracted extra temporary staff to help with the increased workload to ensure priorities were being met. This expenditure was

approved by Council. Some of this work was covered through the overlap between the Deputy Registrars.

In March 2019, Council hired an independent consultant to review the compensation packages at the NLCHP. Council felt this was necessary to address recruitment and retention concerns based primarily on its experience from the hiring of a Deputy Registrar. This review was done independently of staff and the consultant reported back directly to the Chair and Secretary-Treasurer of Council. The consultant recommended salary increases for the positions of CEO/Registrar and Deputy Registrar based on an in-depth comparison of other regulatory bodies in the province. Council approved modest increases for both positions and put in place a salary progression table for all three positions.

The number of allegations received by the NLCHP from members of the public against NLCHP members has increased over the last few years. This caused a significant increase in expenses on account of legal fees from \$6,685 in 2018-2019 to \$23,720 in 2019-2020. While most allegations involving health professionals can be resolved through mediation without the need to obtain legal advice, some cannot. Within the past 6 months, two allegations have been certified as complaints which will go to the Disciplinary Panel under Part V of the *Health Professions Act*. NLCHP will have its first disciplinary panel hearing in 2020 and it is anticipated that legal costs will continue to increase while these matters proceed as required by law. With the number allegations and complaints increasing, the NLCHP anticipates they continue to require increased legal advice. It is sound business practice for the NLCHP to have adequate financial provision for these unpredictable costs should they arise.

The Council has endeavored to avoid increases in the past by using investments to offset unusual operating costs. For example, the NLCHP anticipated the need to use some of its investments that have been built up over the years of small annual surpluses to offset the cost of the new database. However, the continued depletion of the NLCHP's reserves is unsustainable as it is important to ensure the Council has long-term investments in place to address future needs, including the cost associated with addressing complaints when necessary.

Before deciding on the fee increase, which is to take effect in the 2021-2022 fiscal year, the Council did a review of fees of other health regulators in the province and nationally. While there are variations in the fees of the disciplines represented by the NLCHP across the country, the Council is satisfied that the registration fees are in line with what other health regulators are charging their registrants and that the increase is not more

than is necessary to sustain the effective operations of the NLCHP in the coming years.

If fees are not brought into alignment to address the gap between revenues and expenditures the NLCHP will continue to remain in a deficit position. Continued deficits and depletion of savings would have a greater negative impact on its overall financial position going forward. The decisions made by Council were made to ensure a sustainable future for the NLCHP.

3. Will my College fees increase?

No. Currently none of the health professional colleges have plans to increase College fees at this time.

4. Why can't the increase be implemented over several years, rather than in one increase?

To operate in a fiscally responsible manner, the NLCHP must bring fees into alignment with the true cost of providing regulatory oversight. If the fee increase were staggered the NLCHP would continue to remain in a deficit position for longer.

In recognition of the impact of the fee increase on registrants, the NLCHP has opted to implement this change effective April 1, 2021 rather than the renewal period just ended.

5. My fees are paid through payroll deduction. Will my payroll deduction be adjusted to reflect the increase?

Please note for registrants who pay their registration fees through payroll deduction, the increase will be added to this year's deduction as the fees currently being collected are for the April 1, 2021 renewal. Regional Health Authorities (RHAs) were notified by the NLCHP of the fee increase on Friday June 19, 2020 (the day after the fee increase was communicated to registrants). Some RHAs implemented the changes to the payroll deduction immediately, other will implement in upcoming pay periods.

6. What benefits will I see from the fee increase?

As a regulatory body, the NLCHP's mandate is public protection. The NLCHP ensures this through:

- Ensuring registration of qualified health professionals;
- Monitoring compliance, standards of practice and continuing competency of health professionals
- Maintaining Quality Assurance program and conducting quality assurance (QA) of a professional's practice,
- Receiving, investigating, and responding to allegations/complaints about a health professional's practice (this an area that we have seen an increase in over the past year), and
- promoting inter-professional collaboration among the colleges

Registrants should be seeing some of the benefits of the fee increase already through the recent launch of the online registration system and website. The Council approved these initiatives to improve the registration process for registrants and to allow more capacity for the NLCHP to grow. In the Fall of 2020, the NLCHP will launch the Continuing Education Portal component of the online system which will allow registrants to track the CE requirements online and improve the audit process.

As registration renewal will be a once a year event moving forward, the NLCHP will have more time available to focus on other priorities, particularly enhancements to the quality assurance program. The NLCHP will work with the health professional colleges to identify priorities for each professional group. The NLCHP recognizes that the more education needs to be available to registrants about the NLCHP mandate, the role of the Council and regulation.

7. How can registrants access information about NLCHP revenue and expenditure information?

The NLCHP revenues and expenditures are audited and reported annually and published in the Annual Report. Annual Reports are posted on the NLCHP website: <https://www.nlchp.ca/about/publications/>

The 2019-2020 Annual Report will be available on the website on June 25, 2020.

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

Registrants can send comments to secretary@nlchp.ca or mail a letter addressed to the Council Chair to the NLCHP mailing address. All emails and letters received will be submitted to the Council for response.