致安省中医师及针灸师管理局，

我们对管理局最近提出的费用增长持反对态度，原因如下:

1. 管理局初次设定的注册费和年续费相对其他行业并不低.

例如: 注册按摩师的年费为560加币

药剂师年费为678加币

物理治疗师年费为635加币

我们目前含税的年费为960.50加币，排在安省第五位，

2, 现管理局提议，年费在安省消费物价比指数增长的基础上增加2%。（请提出这算式的理据何在？）我们查看了其他（医疗）行业管理局，没有任何管理局提出这样的增长方式。同时按照这样的增长幅度，10年之后，我们的年费会上升到很可观的数目。

3，自从管理局成立之后，我们在原来必须缴纳的保险费，协会费用的基础上又增加了管理局注册费和年续费，而我们的病人收费并没有提高。同时，我们的针灸还没有被许多保险公司投保，我们没有在管理局成立之后扩大我们病人的范围。也就是说，我们在收入没有增加的情况下，需要承担额外且每年增加的支出。

我们理解管理局需要运行费用以完成其所需要履行的职责，但是我们也希望管理局考虑我们所有中医师和针灸师的实际情况，能撤消对注册费和年续费增加的提议。

To The CTCMPAO,

Proposed by-law amendment No.. 200, 201 re: change to registration fee structure

We have the following objections regarding the proposed by-law amendments:

1) The original and current registration application fee and annual renewal fee is already high when compared with most of the other regulated health professions in Ontario. At the same time, our professional service fees tend towards the humbly modest end of the scale (if not the lowest). To illustrate this point, please consider these examples of annual registration fees:

* Registered Massage Therapist - annual fee is $560 (Subject to CPI adjustment);
* Pharmacists - $678 (No CPI provision);
* Physiotherapists - $635 (No CPI provision).

Currently, our annual fee of 2015 - $1192.69 ($1055.48+HST) 4.4% increase over 2014 is the fifth most expensive registration fee amongst twenty-seven regulated health professions in Ontario.

2) No other healthcare regulatory body has a mandatory 2% surcharge on top of the annual CPI adjustment. According to these proposed amendments, our registration renewal fee will be increased significantly over years to the point we will very likely be amongst the top few highest fees within 10 years.

3) At the same time, neither our treatment fees nor the number of patients we treat has increased since the regulation of our TCM/A profession. As a newly regulated health profession, the majority of public and private insurance plans still do not cover TCM/ Acupuncture treatments. In all, members of our College are bearing more setup costs with the same level of income - and this is even before the proposed registration fee increase is in place.

As a statutory public body, the College owes a fiduciary duty to the stakeholders: to keep the public and members fully informed as to matters pertinent to the beneficiary’s interest in the *res*. We do not see the rationale to support the proposed amendment with statements such as, “*poses a potential risk of overspending*…”. It invites further clarification on the College’s efficacy.

We appreciate that the College has its statutory responsibilities and requires a feasible and operational budget; however, from a very conservative income and expenses projections, we found that there is a significant buffers over a 5 years period till March 2017, refer to the Exhibit below. By retaining the current by-law fee structure still exists an abundant room for the Council to reconsider.

*Exhibit: Projected Expenditures and Membership Dues (March 2009 - March 2017)*

Year end \_ Expenses in Dollars \_ Membership Due (projected)\_ March 31, 2009 492,069 (Annual Report)

March 31, 2010 558,149 (Annual Report)

March 31, 2013 756,168 (Annual Report, approx. +12%p.a. over 5 yrs)

March 31, 2014 846,908 (12% p.a., projected) 2,422,950 (2,150x$<960.5+169.5>)

March 31, 2015 1,020,000 (~20% p.a., projected) 2,400,000 (2,450x$980) ~CPI-2%

March 31, 2016 1,220,000 (~20% p.a., projected) 2,700,000 (2,750x$1,000) ~CPI-2%

March 31, 2017 1,500,000 (~20% p.a., projected) 3,000,000 (3,050x$1,020) ~CPI-2%

In summary, we agree with a hold on the annual rate increase for 2016. In addition, we proposed to change the bylaw by removing the +2% and only increase the rates each year based on CPI.

We thank you for your time,

[NAME]

CC: Hon. Dr. Eric Hoskins

*Minister of Ministry of Health and Long-Term Care*