

BRIEFING NOTE

TO: Board of Directors

FROM: Registration Committee

DATE: May 30, 2022

SUBJECT: 5.1 Registrant and Stakeholder Consultation: Proposed Changes to the By-Laws
Appendix A: Full Text of Proposed By-Law Changes
Appendix B: Registrant and Stakeholder Survey Results
Appendix C: Environmental Scan Results

☒ For Decision

☐ For Information

☐ Monitoring Report

Purpose:

To obtain the Board's approval of the proposed changes to the by-laws relating to the Inactive Class of registration and professional liability insurance.

Background:

The College of Opticians of Ontario (the "College") is currently seeking amendments to the Registration Regulation under the *Opticianry Act, 1991*. The [proposed amendments](#) were submitted to the Ministry of Health in June 2017 following extensive consultation with registrants, opticianry associations, educators, and industry stakeholders and are currently awaiting final approval. The intent of the proposed changes is to streamline the current Registration Regulation.

The amended Registration Regulation will require several by-law and policy updates which the College will be working through over the course of the year. Currently there are two areas for which the College sought feedback from registrants and stakeholders:

- **Fee for Inactive Class:** The proposed by-law changes will set the 2023 registration fee for a new Inactive Class of registration that will be available once the Ontario Government approves amendments to the Registration Regulation. The new Inactive Class of registration will permit opticians who are not actively practicing the profession to remain registered with the College but will that they are clearly identified to the public as non-practising. Examples may include medical, parental or educational leave, change of profession, or temporary move out of Ontario. Under the new regulation, registrants will not be permitted to maintain their suspended status indefinitely and will have their certificate of registration revoked after three consecutive years of suspension.

- **Professional Liability Insurance:** These details are currently found in the Registration Regulation itself but will be moved into the by-laws once the amendments to the regulation are approved by the Ontario Government. It was proposed that the details of liability insurance be removed from the regulation and addressed through by-law since this provides more flexibility. The proposed by-laws relating to insurance mirror the current requirements set out in the Regulation.

For Consideration

Annual Fee

Registrants in the inactive class will be required to renew their certificate of registration on an annual basis and pay a registration fee. Introduction of the inactive class of registration provides a lower-fee option for registrants who are not planning to practice, but that still accounts for the fact that it requires administrative resources to manage their non-practising status.

The Registration Committee has proposed that the annual fee for opticians in the Inactive Class be equal to 1/3 of the Registered Optician Fee. For the 2023 renewal year, this would make the Inactive Optician fee equal to \$331.

Changing Class from Inactive to Active during the year

Registrants may apply to change their class of registration at any time during the registration year. During the renewal period, registrants will be provided with an option to renew in their current class of registration or change class. An administrative fee of \$125 will be charged to switch between the inactive and active classes outside of the renewal period.

Under the current proposal, registrants who elect to change their status from Inactive to Active during the year will pay a pro-rated fee to “top up” their registration from inactive to active status. Registrants will also need to submit proof of professional liability insurance. In addition, certain registrants will need to be assessed for currency [note: a formal policy on currency will be developed by the Registration Committee and brought to the Board for review at a later date].

Changing Class from Active to Inactive during the year

Registrants may change their class of registration from active to inactive during the registration year but will not be eligible for a refund of the unused portion of their annual registration fee. Inactive optician will not be required to carry professional liability insurance.

Registrant and Stakeholder Survey Results

The draft by-law amendments were initially circulated via e-blast to registrants on March 25, 2022. Individuals were also invited to participate in the survey via social media. Links to the proposed amendments, background information and survey were posted to the College’s website. Individuals were invited to answer survey questions and provide additional comments.

The survey closed on May 25, 2022 and received 217 responses. The following chart provides a summary of the stakeholder feedback received, including a summary of the main themes that were identified in the comments:

	Inactive Class Fees	Professional Liability Insurance
% in Favour	75.48%	76.92%
% Neutral/Unsure	10.10%	14.42%
% Opposed	14.42%	6.73%
Comments/Concerns	<ul style="list-style-type: none"> -I agree with a fraction of the cost be implemented as it is similar to holding their license. Not too sure if 1/3 is reasonable. -What is the 1/3 fees for exactly if they are not active and practicing? -Keeping the fees affordable will enable members to maintain licensing requirements as well as making it easier to return to the profession. -Brilliant idea to have inactive. 	<ul style="list-style-type: none"> -I agree that professional liability insurance should be mandatory to renew the license for practicing opticians at least. -It makes sense to not have to have professional liability when you are not practicing.

The survey results demonstrate that the majority of survey respondents are in support of the proposed by-law amendments and thus reaffirm the direction the Registration Committee has proposed. A small number of respondents expressed concern about the inactive fee being set too high.

Environmental Scan Results

Per request of the Registration Committee, staff conducted an environmental scan of Ontario Health Profession regulators; a breakdown of the findings is attached as Appendix C.

The environmental scan identified that the majority of regulators in Ontario have some form of a non-practising class, with annual registration fees ranging from 18.5% to 58% of the general class registration fees. It was further found that the most favourable option for the class transfer was to do so during the renewal period; this trend was consistent across regulators. When the registrant was moving from the inactive class to the general class, they were charged the difference between the two fees. Most regulators did not issue refunds or offer rebates for a portion of the unused registration fee when the registrant was moving from general to the inactive class during the registration year. Approximately 25% of regulatory Colleges offered a prorated option to those registrants who transferred from the inactive to general class of registration during the registration year. It must be noted that these findings are consistent with the direction taken by the COO.

Public Interest Considerations

The Registration Committee considered that it is in the public interest to set a fee for the new Inactive Class at a rate that will ensure that the COO can manage the administrative of inactive members while not being overly onerous to registrants. In the Committee's view, the proposed fee will strike this balance. In addition, the Committee considered that it is in the public interest for the by-laws to provide clarity and transparency around professional liability insurance requirements once these requirements are removed from the Regulation.

Diversity, Equity and Inclusion Considerations

The Registration Committee considered that the proposed fee structure for the new Inactive Class will balance the needs of registrants in different life circumstances against the need for the COO to maintain financial stability and cover the administrative costs of managing inactive members.

Recommendation/Action Required

Based on the information presented to the Board, the Registration Committee recommends that the Board approve the proposed changes to the by-laws of the College as they relate to the:

- a) Fee(s) associated with Inactive Class of Registration; and
- b) Professional Liability Insurance

Please note that if approved, these by-law changes will not come into effect until such time as the amendments to the Registration Regulation are approved by the Ontario Government.

Appendix A: Proposed Changes to the By-Law Text

The full text of the proposed additions to the by-laws are set out below, in red.

Article 5: Fees

(a) Annual Registration Fees

Class	2017	2018	2019	2020	2021	2022	2023
Registered Optician	\$899	\$921	\$944	\$968	\$742	\$867	\$992
Registered Intern Optician	\$132	\$136	\$139	\$142	\$146	\$146	\$146
Registered Student Optician	\$132	\$136	\$139	\$142	\$146	\$146	\$146
Inactive Optician	-	-	-	-	-	-	\$331

(b) Pro-rated Registration Fees

(i) For individuals who have never been registered with the College, the initial annual registration fee for the Registered Optician class is pro-rated as follows:

- a. For applications submitted in the period January 1 to March 31:
100% of the posted registration fee.
- b. For applications submitted in the period April 1 to June 30:
75% of the posted registration fee.
- c. For applications submitted in the period July 1 to September 31:
50% of the posted registration fee.
- d. For applications submitted in the period October 1 to December 31:
25% of the posted fee.

(ii) Individuals who are registered in the Inactive Class and have paid the annual registration fee for the Inactive Class, and who request to change their status to the Registered Optician class, will be charged the following pro-rated Registered Optician fee:

- a. For requests submitted in the period January 1 to March 31:
67% of the posted Registered Optician registration fee.
- b. For requests submitted in the period April 1 to June 30:
50% of the posted Registered Optician registration fee.
- c. For requests submitted in the period July 1 to September 31:
33% of the posted Registered Optician registration fee.

- d. For requests submitted in the period October 1 to December 31:
17% of the posted Registered Optician fee.

5.5 Reinstatement Fees and Status Change Fees

- (a) The reinstatement fees for the reinstatement of a certificate of registration for a Registrant who has been suspended by the Registrar, or as a result of a disciplinary or incapacity proceeding, are as follows:

Registered Optician:	\$125
Registered Intern Optician:	\$50
Registered Student Optician:	\$50

- (b) In addition to the reinstatement fee set out in 5.5 (a), the Registrant must pay the annual registration fee for the year in which they reinstate.
- (c) The fee for a Registrant to change from the Registered Optician Class to the Inactive Class or from the Inactive Class to the Registered Optician Class is \$125. This fee will only be charged if the change in status is made at a time other than during the Registrant's annual renewal process.
- (d) In addition to the status change fee set out in 5.5(c), a Registrant changing from the Inactive Class to the Registered Optician class must pay the annual registration fee for the year in which they return to the Registered Optician class, in accordance with the pro-rated fee schedule set out in article 5.2(b)(ii).

Article 25: Professional Liability Insurance

25.1 Professional Liability Insurance Mandatory

No Registrants shall engage in the practice of opticianry unless they have professional liability insurance containing coverage of not less than \$1,000,000.

25.2 Evidence of Liability Insurance

Registrants who are required to hold the professional liability insurance referred to in section 25.1 shall provide current documentary proof, in a form acceptable to the Registrar, that their professional liability insurance complies with this section in the following circumstances:

- (a) As a condition for the issue, renewal or reinstatement of a certificate of registration as a Registered Optician.
- (b) As a condition for a Registrant to change their status from the Inactive class to the Registered Optician class.

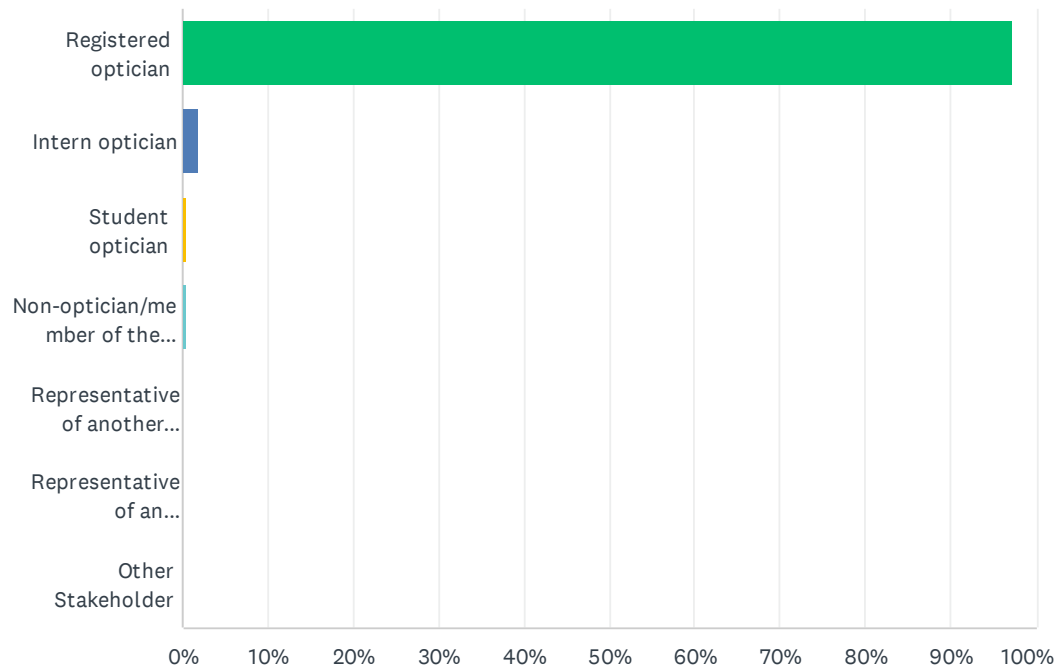
- (c) At any other time within 30 days of a request by the College.

25.3 Exemption

- (a) A Registrant who applies for the issue, renewal or reinstatement of a certificate of registration as a Registered Optician is exempt from the requirement to provide proof of professional liability insurance if, at the time they submit the application form, they provide the Registrar with a written undertaking that they will not engage in the practice of opticianry nor supervise or direct a Registered Intern Optician, Registered Student Optician or any other student optician until they provide current documentary proof, in a form acceptable to the Registrar, that they hold the professional liability insurance referred to in section 25.1.
- (b) Breach of an undertaking referred to in subsection (a) shall be an act of professional misconduct for the purposes of clause 51 (1) (c) of the Health Professions Procedural Code.

Q1 Are you a:

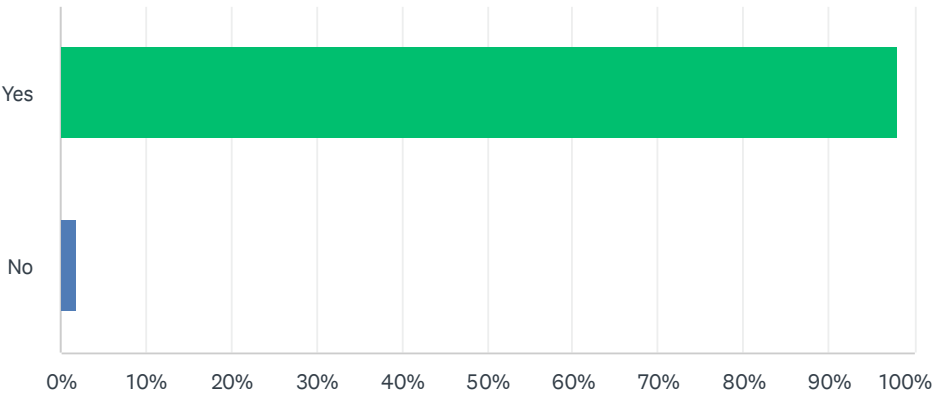
Answered: 217 Skipped: 0



ANSWER CHOICES	RESPONSES	
Registered optician	97.24%	211
Intern optician	1.84%	4
Student optician	0.46%	1
Non-optician/member of the public	0.46%	1
Representative of another Regulatory Body	0.00%	0
Representative of an Opticianry Association	0.00%	0
Other Stakeholder	0.00%	0
TOTAL		217

Q2 Did you renew your registration in 2022?

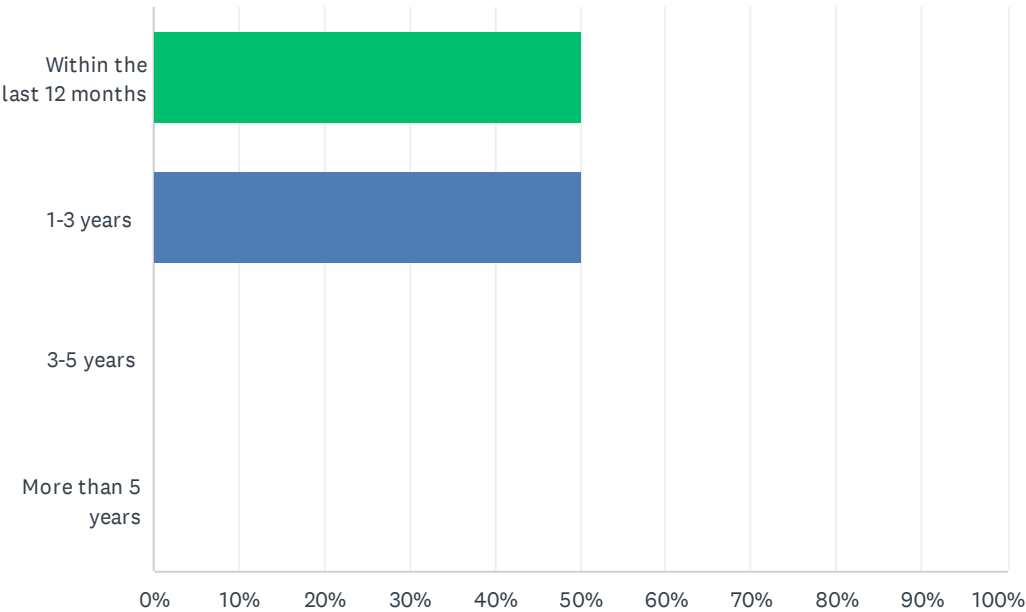
Answered: 210 Skipped: 7



ANSWER CHOICES	RESPONSES	
Yes	98.10%	206
No	1.90%	4
Total Respondents: 210		

Q3 How long has it been since you last renewed your registration?

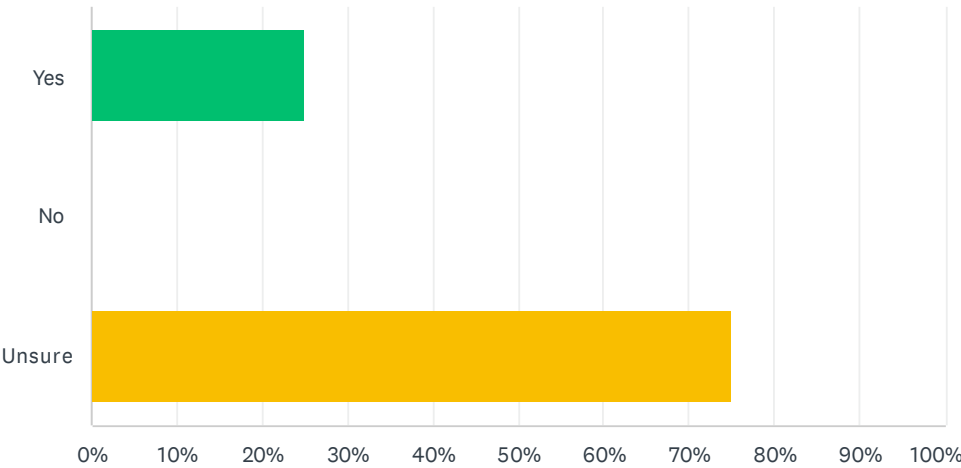
Answered: 4 Skipped: 213



ANSWER CHOICES	RESPONSES	
Within the last 12 months	50.00%	2
1-3 years	50.00%	2
3-5 years	0.00%	0
More than 5 years	0.00%	0
TOTAL		4

Q4 Do you plan to return to practice?

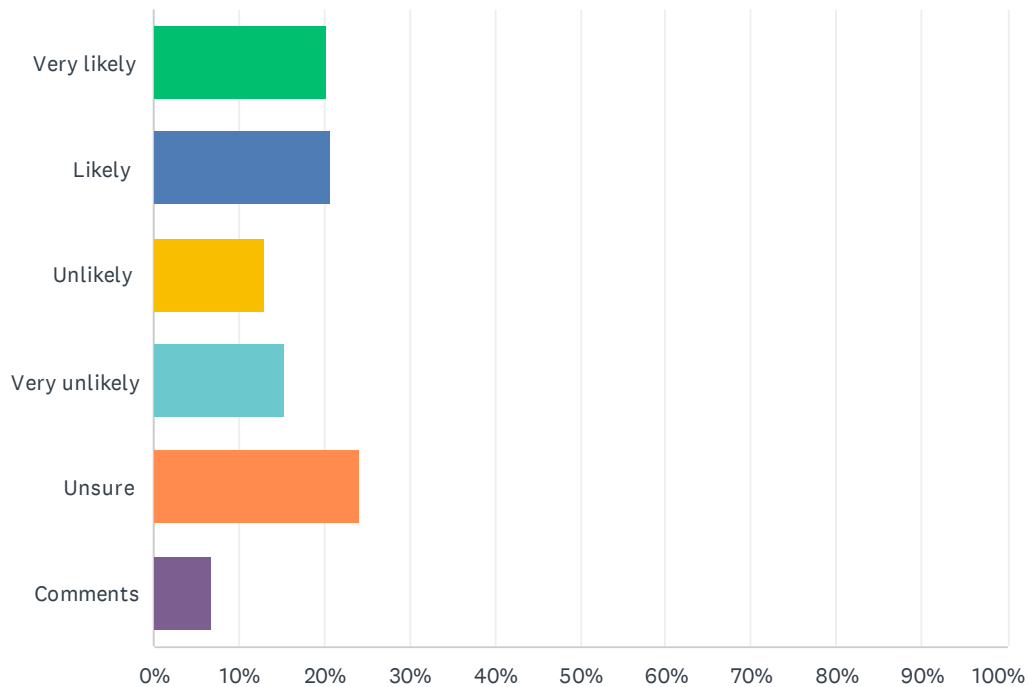
Answered: 4 Skipped: 213



ANSWER CHOICES	RESPONSES	
Yes	25.00%	1
No	0.00%	0
Unsure	75.00%	3
TOTAL		4

Q5 Under the new Registration Regulation, opticians who are suspended for non-payment of fees for more than three years will have their registration automatically revoked. Instead, these opticians can opt to join the inactive class if they not currently practising the profession but plan to return in the future. How likely are you to join the inactive class at any point in the future, once this option becomes available?

Answered: 208 Skipped: 9



ANSWER CHOICES	RESPONSES	
Very likely	20.19%	42
Likely	20.67%	43
Unlikely	12.98%	27
Very unlikely	15.38%	32
Unsure	24.04%	50
Comments	6.73%	14
TOTAL		208

#	COMMENTS	DATE
1	If not renewing or pausing very likely.	5/24/2022 10:48 PM
2	Why pay the fee when after 3 years under the inactive status you lose your licence anyway? No where has there been any conversation regarding if you need to maintain the con ed credits	5/24/2022 6:01 PM

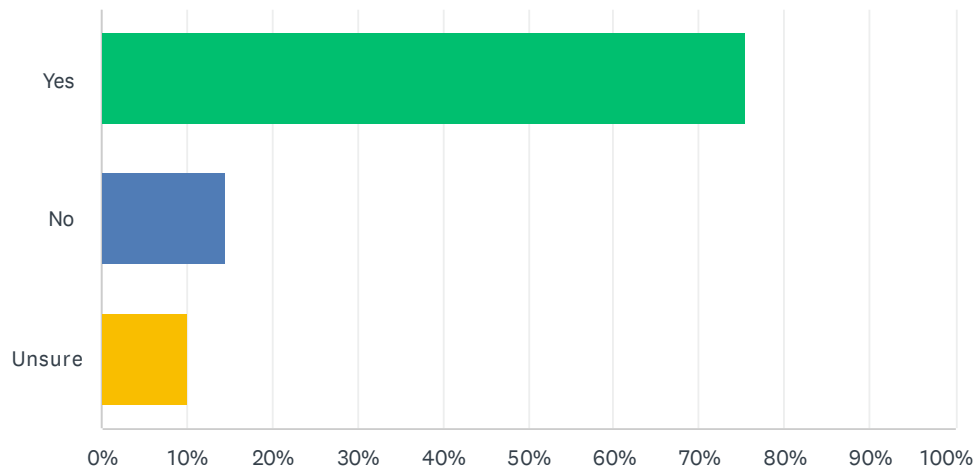
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as well. This process seems to be a costly endeavour for someone taking a break from the field

3	It is possible for circumstances outside of my control such as medical leave or maternity leave.	5/24/2022 5:38 PM
4	Not currently something being considered but who knows what the future will bring -	5/13/2022 8:35 AM
5	How can you revoke a licence for non payment. This is not an acceptable approach to this problem.	4/7/2022 10:52 PM
6	Unsure, there are many factors that could lead an optician to join this class.	4/7/2022 5:44 AM
7	I renew regardless of whether I am working in the field	4/5/2022 7:34 AM
8	I don't feel that the inactive class of opticians should have their licenses revoked if they go beyond 3 years without practicing as long as they keep up with their CE courses. If they are really inactive, these opticians should not have to pay for their licenses like before as long as they sign a waiver stating that they are not practicing. I can't speak for what will happen in the future but what if some of the inactive opticians cannot find a job within the 3 years? Having to pay a fee even a reduced fee still means they are active.	4/4/2022 4:10 PM
9	Consideration: The inactive member should continue with all QA requirements but shall not be a subjected to a QA Portfolio Review.	4/3/2022 11:27 AM
10	opticians who work seasonal, what would the fee be for them? 6months of work 6months off . could the fee be 1/2 of \$992=\$496?	4/1/2022 6:31 PM
11	This is confusing. Do you only become inactive once those 3 years have passed? Or are you required to become inactive from the beginning of pausing your license? The college needs to make this more clear as the wording leaves a lot open to interpretation at the moment. If you suspend you license and wish to return before the 3 years is up, are you also entitled to the prorated fees or is that only for opticians who have paid the \$331 inactive fee? If you have to pay the inactive fee to be eligible for a prorated active fee, that feels very much like a cash grab.	4/1/2022 2:06 PM
12	It's very confusing. If I were to go on medical or maternity leave, would I have to pay the inactive fee or could I suspend my license as before? I don't really understand what the point of the inactive class is. Is it for people who wish to suspend practicing for more than the 3 years? Are there penalties for suspending vs going inactive?	4/1/2022 11:56 AM
13	Be specific. What do you mean exactly, if an optician is in the inactive class then wishes to resume dispensing, are they penalized by the college. You can not legally take away someone's education, that they have earned.	4/1/2022 11:32 AM
14	Pregnant. New mother. Not sure if child care is an affordable option at this time. Might need to become temporary stay at home mom	4/1/2022 11:18 AM

Q6 The Registration Committee is proposing a reduced fee for the Inactive Class that will be equal to 1/3 of the full fee. Do you agree with this approach?

Answered: 208 Skipped: 9



ANSWER CHOICES	RESPONSES	
Yes	75.48%	157
No	14.42%	30
Unsure	10.10%	21
TOTAL		208

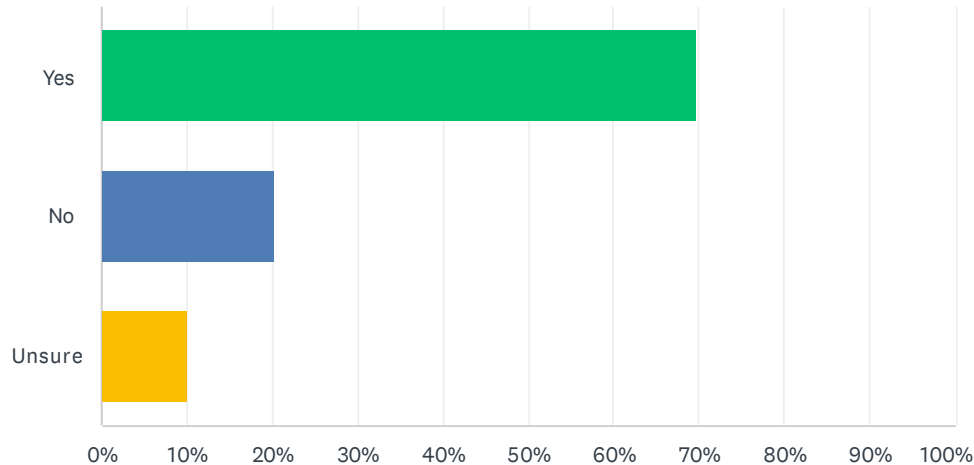
#	COMMENTS	DATE
1	There should be NO FEE!...we have studied, we have paid the obscenely high license fees for too long!...you should continue to complete the portfolio annually but there should be NO FEE to have a temporarily inactive status....charging certainly seems like greed!	5/26/2022 9:02 AM
2	I believe the fee for inactive class should be a reduced fee, but believe that 1/3 of the full fee is still a high fee for someone who is not currently practicing.	5/26/2022 6:59 AM
3	However it depends on the reason. If the optician is inactive due to illness, injury, or parental leave I feel they should not be penalized and have to pay a 1/3 of the full fee. If they are taking a sabbatical, but want to return to the profession (ie: electing to take a break voluntarily) the 1/3 fee makes sense.	5/25/2022 12:54 PM
4	What are they receiving in exchange for this payment?	5/25/2022 12:35 PM
5	Although I do find it a little high. I would set it at 25% of the annual fees	5/25/2022 12:28 PM
6	If they are not practicing, why should they pay a fee?	5/25/2022 8:19 AM
7	Fee is too high cannot be justified just another money grab by the college. Keep fees decent	5/25/2022 5:44 AM
8	Should be \$100 a year. 1/3 is still too high	5/25/2022 1:54 AM
9	Very helpful as I approach retirement	5/24/2022 9:55 PM
10	Sure would have helped during Covid-19. We did not all work.	5/24/2022 8:45 PM

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11	There should be no fee for an inactive user.	5/24/2022 6:55 PM
12	Depends how long you remain inactive for. Maybe if it's a gap year fees can be waived if you register the next year. Not sure how the policies work and numbers can be changed as well.	5/24/2022 6:54 PM
13	Inactive should be free!	5/24/2022 6:25 PM
14	Seems too high for an account that is inactive. Yes, I understand initially there may be a bit of work involved but after that the account would sit dormant unless they want to re-activate it. Make up your difference then. Don't penalize someone for taking a break especially when they would no longer be making an optician's wages	5/24/2022 6:05 PM
15	I believe the fees should be closer to the fees of an intern optician, rather than 1/3 the cost of the full fee. 1/3 of the fee seems too costly.	5/24/2022 5:44 PM
16	If they aren't practicing, their fee should mirror a intern optician. 1/3 is gouging in my opinion. to what does this fee go towards in the college?	5/24/2022 5:43 PM
17	If they are inactive they should not be paying to be part of something they aren't receiving anything from.	5/24/2022 5:36 PM
18	I agree with a fraction of the cost be implemented as it is similar to holding their license. Not too sure if 1/3 is reasonable. Depends on why they are not practicing.	5/5/2022 3:00 PM
19	Too expensive for an administration fee.	4/28/2022 1:04 PM
20	Could much lower, just a token fee. Our fees are extremely high compared to our wages, way out of proportion.	4/23/2022 5:13 PM
21	Again, this is a very lazy approach to this problem. This must be dealt with by a case to case decision. That is the only way to be fair with the opticians. Also I'm sure that this problem is limited to a very few. It should be fairly easy to deal with this minority.	4/7/2022 10:58 PM
22	I feel this would help to accommodate those that may be inactive due to illness or maternity leave. These individuals would already be facing a change in their income and I feel this fee reduce encourages DEI.	4/7/2022 5:47 AM
23	What will this do to fees for those opticians who renew annually	4/5/2022 7:35 AM
24	What is the 1/3 fees for exactly if they are not active and practicing? This fees is a scam and should be lowered to \$50 or \$100 at the most	4/3/2022 10:07 PM
25	It should be a little lower fee. I think the fee should only be 25% of the regular fee rather than 1/3.	4/3/2022 9:00 PM
26	50% would be better.	4/2/2022 2:34 PM
27	The fee of approx. \$300.00 is to high for being given the privilege of doing absolutely nothing in the profession. Why would anybody not to be able to work	4/2/2022 11:04 AM
28	I agree with reducing the fee for the Inactive Class, but the fee should be even less. The fee is still too high for a Licensed Optician that is not currently practicing. I believe that the fee should be around \$150 or less. This is because the benefit from paying such a high fee of \$300 (as it is 1/3 of the current full renewal fee) does not justify the amount being paid.	4/2/2022 10:18 AM
29	Should be the same price or less than a student fee...100/150? It's inactive so what admin is there? As soon as you go active you pay the top up and that covers admin.	4/2/2022 8:07 AM
30	Again, is this only after you have been afforded a 3 year unpaid grace period or do you need to pay right away? I do agree that after the 3 years a fee is appropriate, however asking people who are going on leave (often in already precarious positions due to health issues or parental leave) to pay for a license they will not be using seems punitive and wrong.	4/1/2022 2:24 PM
31	I still recommend opticians CE credits requirements remains the same.	4/1/2022 2:08 PM
32	keeping the fees affordable will enable members to maintain licencing requirements as well as making it easier to return to the profession!	4/1/2022 1:56 PM
33	Would this cause any change to the fee for "active" opticians	4/1/2022 12:06 PM

Q7 Do you agree with the top-up that will be charged to registrants who change their status from “inactive” to “active” mid-way through the year?

Answered: 208 Skipped: 9



ANSWER CHOICES	RESPONSES	
Yes	69.71%	145
No	20.19%	42
Unsure	10.10%	21
TOTAL		208

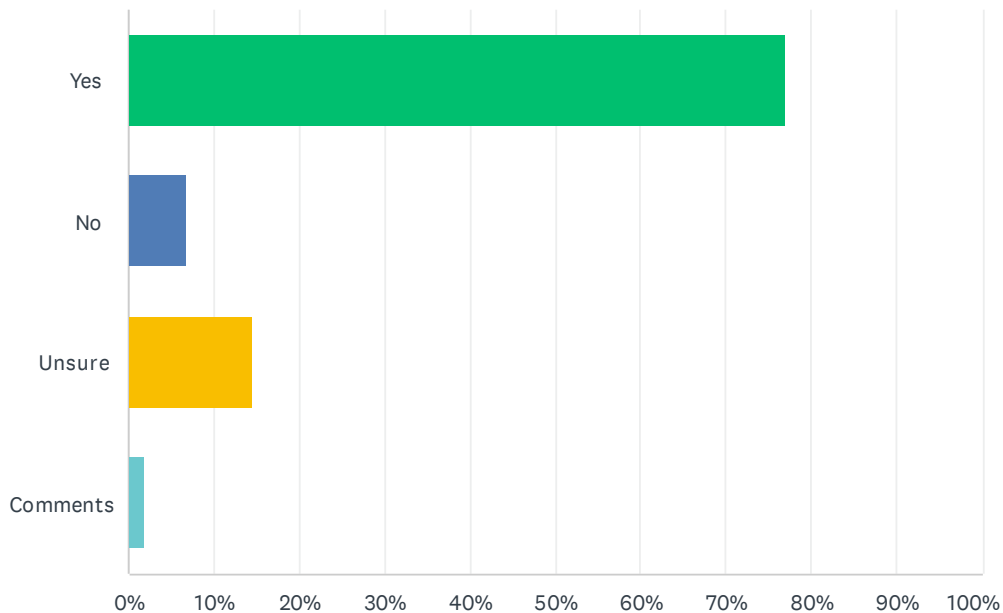
#	COMMENTS	DATE
1	Within reason	5/25/2022 5:07 PM
2	Pro rated of course	5/25/2022 12:28 PM
3	Too much talk about charges and money College is there to focus on prtecting the public therefore be more involved in the ever growing instances of illegal dispensing not punishing those who play by the rule but may temporary have other priorities including financial Also please keep looking at ways you can save money	5/25/2022 5:44 AM
4	Not a lot of jobs that pay 22-30 an hour ask for so much money just to work	5/25/2022 1:54 AM
5	Perhaps a case by case basis?	5/24/2022 9:55 PM
6	Charge for what they practise in a year not for what they haven't . Especially if it's maternity	5/24/2022 9:50 PM
7	It should be prorated.	5/24/2022 7:27 PM
8	Does not make sense adding additional fee to activating mid year. The fees are already expensive as is.	5/24/2022 6:55 PM
9	If individuals opt to go from inactive to active throughout the year, they should be required to pay a pro-rated fee for the amount of time they wish to become active and the inactive fee should be deducted from that amount.	5/24/2022 5:44 PM
10	Sure.. if I change my tv service halfway through the billing period my rate is prorated. Should be the same returning to active status based on the time in the period	5/24/2022 5:43 PM

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11	That is a fair approach - otherwise people would take advantage of any loopholes	5/13/2022 8:38 AM
12	If is partial	4/23/2022 5:13 PM
13	Why would there be any difference in fees just because he is inactive. The fees should always be the same in any circumstance.	4/7/2022 10:58 PM
14	Yes, you should pay the appropriate fee according to the amount of time you actively practice in a year.	4/7/2022 5:47 AM
15	I agree that there should be a charge but not as high as \$125	4/4/2022 4:12 PM
16	If your going to charge a fee, that fee should be removed from the balance if the optician would like to switch from inactive to active.	4/3/2022 9:00 PM
17	Depending what the fee is . I feel if they start practising half way the optician should only be charged half . So whatever they paid plus the difference to bring them to half. That would be fair	4/2/2022 11:28 PM
18	The fee of \$125 is just the right amount. Having the fee to be \$175 for the Inactive class would be just enough but paying \$300 is a little too much. (Current renewal fee of \$900; 1/3 is \$300 is just too much.)	4/2/2022 10:18 AM
19	They are already paying for the rest of the year	4/1/2022 6:39 PM
20	A prorated fee has always been extended to new members of the college so it's only fair that those of us who have paid our dues (literally) for years are extended that same courtesy. I actually had to postpone my own return to work because of this policy, I could not afford a full license fee for the 2 months that it would be in use after being off work to care for my child. It caused a lot of strife as that was an additional 2 months I had to go unpaid since my government benefits had run out. This was an issue I tried to raise with Anna in your registration department but my concerns were promptly dismissed.	4/1/2022 2:24 PM
21	If it is measured by quarter of year or half etc	4/1/2022 1:02 PM
22	The college is always trying to gouge opticians, we do not earn that much, enough.	4/1/2022 11:37 AM
23	They should be charged less still	4/1/2022 11:06 AM

Q8 The Registration Committee is proposing to keep the by-laws relating to professional liability insurance the same as what is currently in place in the regulation. Do you agree with this approach?

Answered: 208 Skipped: 9



ANSWER CHOICES	RESPONSES	
Yes	76.92%	160
No	6.73%	14
Unsure	14.42%	30
Comments	1.92%	4
TOTAL		208

#	COMMENTS	DATE
1	Not clear what this means	5/25/2022 1:54 AM
2	Part time work: less insurance coverage?	5/24/2022 9:55 PM
3	No comments	4/7/2022 10:36 PM
4	No one regulates this profession, there are so many people dispensing unlicensed, it's disgusting! The college continues to penalize opticians, who do not make much by the way, while letting illegal dispensing go on everywhere.	4/1/2022 11:37 AM

Q9 Additional Comments

Answered: 20 Skipped: 197

#	RESPONSES	DATE
1	License fees are too high, we are still in a pandemic with drastically reduced income, it is a hardship to many to make ends meet, let alone coming up with the ridiculously high license fee at the end of the year. Having an college office in the middle of downtown with extremally high rent makes no sense, its a waste of our license money. Find a small office outside of the city core for much less. Now that the portfolio is completed on line, there is no need for the amount of staff, reduce this number to reduce our fees. Show some compassion for the majority of us that are just getting by.	5/26/2022 9:02 AM
2	Inactive Opticians shouldn't for insurance	5/25/2022 1:35 PM
3	I think the inactive registrant has been a long time coming	5/24/2022 9:55 PM
4	Don't really have any.	5/24/2022 9:31 PM
5	N/A	5/24/2022 9:31 PM
6	it is honestly hard to say if i will decide to go back to work after retirement.	5/24/2022 7:48 PM
7	No	5/24/2022 7:45 PM
8	Our license fees are extremely expensive when comparing to other health related careers	5/24/2022 5:54 PM
9	Should not have to submit proof , we should have the college as an additional insured so they know when it lapses. Or just attestation	5/24/2022 5:44 PM
10	No comments	4/7/2022 10:36 PM
11	None	4/4/2022 10:35 AM
12	It makes sense to not have to have a professional liability when you are not practicing. The fee of opticians is too high. It does not have enough benefit for it to be that high of an amount. (\$175 is just right of an amount, not \$300 -- since changing from Inactive class to practicing is a fee of \$125 for administrative fee)	4/2/2022 10:18 AM
13	Brilliant idea to have inactive. Many heath care workers are burnt out from the pandemic and a surprising number may take a break from the profession. Without initiating an inactive status, you may find many leave the profession and never come back.	4/2/2022 8:07 AM
14	Too expensive	4/1/2022 11:10 PM
15	How does the "inactive" status relate to an optician who has a job in a corporate position? Why would they have to have their license suspended/revoked due to their nature of work?	4/1/2022 5:10 PM
16	As you can probably tell, this is an issue I am passionate about and I would love some clarification on this policy as after reviewing the explanatory document, things still have not been explained. Please contact me at skolbegger@gmail.com. I have listed my outstanding questions below. 1) When going on medical or parental leave, what is the benefit to the optician to go inactive and pay versus suspending their license? 2) Will the prorated fees also be offered to opticians who are within the 3 years of allowed suspension or is that a courtesy that we must pay for? 3) If being inactive is the only way to access the prorated license fee, this is now a policy that will disproportionately affect your female members as they are typically the ones taking leaves to care for children or other family members. How can the college justify this? It seems quite punitive but again, I am unclear if this will be the case. 4) Will the college be detailing what the \$331 will be used for? It seems as though every year we are expected to pay for more and more, despite having one of the highest fees in province and yet we receive less and less for what we are paying. Now we are being asked to pay for a license we cannot use, how do you justify that? I look forward to your response. Again, please contact me at	4/1/2022 2:24 PM
17	I agree that professional liability insurance should be mandatory to renew the license for	4/1/2022 2:08 PM

Stakeholder Feedback Survey: Proposed By-Law Amendments

	practicing opticians at least.	
18	Should reduce the fee for licence renewing and the penenaty fee for deficient certificates since there are many opticians nowadays, all will be shared out to make the fee reduced	4/1/2022 1:16 PM
19	About time this was implemented! Well done!	4/1/2022 11:17 AM
20	Please also separate the contact lens licensing and glasses licensing from the NACOR exams so that we can have glasses only opticians as I feel having them combined restricts our profession from people with certain disabilities	4/1/2022 10:56 AM

Appendix C - Environmental Scan of Ontario Health Regulators

<u>Governing Body</u>	<u>Inactive Class</u>	<u>Annual Fee</u>	<u>Notes</u>
College of Audiologists and Speech-Language Pathologists of Ontario	Yes	\$390	50% of the General class fee If the class change from general/academinc to non-practicing occurs during renewal, the member is required to pay a one-month fee adjustment (\$33) and an annual fee payment applicable to a non-practising certificate. If the class change from general/academic to non-practicing occurs after renewal, the member is required to pay an application fee (\$150). No rebates of fees for the remainder of the registration year are provided. If the class change from non-practicing to general occurs during renewal, the member is required to pay a one-month fee adjustment (\$33) and an annual fee payment applicable to a general certificate. If the class change from non-practicing to general occurs after renewal, the member is required to pay an application fee (\$150) and an annual fee adjustment equal to the difference between the general and non-practicing annual renewal fees.
College of Chiropodists of Ontario	n/a		

College of Chiropractors of Ontario	Yes	\$475	<p>45% of the General class fee</p> <p>When changing class from inactive to general, the member is required to pay the applicable fee for a general certificate of registration</p> <p>Additional fees:</p> <p>\$50 application fee, unless the applicant already has a general certificate, in which case the application fee is NIL</p> <p>In addition to the application fee and the annual fee, an applicant for inactive class of registration must pay the initial certificate fee of \$325</p>
College of Dental Hygienists of Ontario	Yes	\$200	<p>50% of the General class fee</p> <p>If the class change occurs outside of renewal period, the Registrant must pay the difference between the annual fee paid on January 1 and the annual fee payable for the certificate for which the Registrant applied if the latter fee is greater.</p>
College of Dental Technologists of Ontario	Yes	\$838	<p>47% of the General class fee</p> <p>Class change processing fee - \$279</p>
Royal College of Dental Surgeons of Ontario	n/a		<p>35% of the General class fee</p> <p>Additional fees:</p> <p>\$100 class change fee</p> <p>Quarterly pro rata fee option is available for those transferring back to general class before renewal</p>
College of Denturists of Ontario	Yes	\$665	
College of Dietitians of Ontario	n/a		

College of Homeopaths of Ontario	Yes	\$725	<p>58% of the General class fee</p> <p>Additional fees:</p> <p>\$100 class transfer fee</p> <p>If the registrant requests a transfer to the Inactive class at the time of renewal, they will be required to pay the transfer fee plus the inactive class registration fee.</p> <p>If the registrant requests a transfer outside of renewal period and already paid a registration fee for the current year, the registrant will pay only the transfer fee with their request form.</p> <p>If the registrant requests a transfer to the general class, they will be require to pay the transfer fee and the amount difference between the ilnactive class registration fee and the general class registration fee.</p>
College of Kinesiologists of Ontario	Yes	\$200	<p>31% of the General class fee</p> <p>Additional fees:</p> <p>\$50 class change fee</p> <p>Quarterly pro rata fee option is available for those transferring back to general class before renewal</p>
College of Massage Therapists of Ontario	Yes	\$200	<p>26% of the General class fee</p> <p>When the registrant is moving from the inactive class to the general class, the fee shall be the difference between the two fees.</p> <p>No refunds are issued when moving from general to the inactive class outside of renewal period.</p>

College of Medical Laboratory Technologists of Ontario	Yes	\$170	50% of the General class feec On changing their certificate from non-practising to practising the registrant shall pay the difference between the annual fee for the practising certificate and the annual fee for the non-practising certificate.
College of Medical Radiation Technologists of Ontario	n/a		
College of Midwives of Ontario	Yes	\$1075	43% of the General class fee Additional fees: \$50 class change fee When changing class from inactive to general, the registrant pays general fees for the months or partial months practising and inactive fees for the months not practising in a registration year. When changing class from general to inactive, a refund is issued for the difference between general fees paid and inactive fees for the membership year.
College of Naturopaths of Ontario	Yes	\$845	50% of the General class fee Additional fees: \$100 class change application \$275 class change application over two years On changing their certificate from inactive to general, the registrant shall pay the difference between the annual fee for the general certificate and the annual fee for the inactive certificate.
College of Nurses of Ontario	Yes	\$50	18.5% of the General class fee No class change fee
College of Occupational Therapists of Ontario	n/a		

College of Optometrists of Ontario	Yes	372	<p>50% of the General class fee</p> <p>If the class change occurs outside of the renewal period, the registrant is required to pay an administrative fee of \$100.</p> <p>There will be no refunds due for registrants who wish to change their status from “practising” to “non-practising.”</p> <p>If a registrant requests to change status from “non-practising” to “practising” before or on the 15th day of the month, the pro-rated portion of 50% of a full practising member annual fee will be include the month that the request is received. If the request is received after the 15th day of the month, the pro-rated portion of 50% of a full practising registrant annual fee will not include the month the request was received.</p>
Ontario College of Pharmacists	Yes	\$394.65	50% of the General class fee
College of Physicians and Surgeons of Ontario	Parental leave reduced annual fee	\$862.50	50% of the General class fee
College of Physiotherapists of Ontario	n/a		
College of Psychologists of Ontario	Yes	\$238.50	<p>30% of the General class fee</p> <p>Additional fees:</p> <p>\$100 application fee</p> <p>Members with an Inactive certificate may return to autonomous practice within two years by paying the prorated fee for the year of return.</p>

College of Registered Psychotherapists of Ontario	Yes	\$295	<p>50% of the General class fee</p> <p>Additional fees:</p> <p>\$100 class transfer fee</p> <p>If the class change from general to inactive occurs during the renewal period, the registrant is required to pay the annual fee payment applicable to an inactive certificate.</p> <p>No credit, refund or reimbursement is issued to a registrant who moves from RP status to Inactive at any point through the registration year.</p>
College of Respiratory Therapists of Ontario	Yes	\$125	<p>19% of the General class fee</p> <p>Additional fees:</p> <p>\$75 application fee</p> <p>Members who change their membership to inactive during the registration year may be eligible for a partial refund of their annual registration fee (prorated on a quarterly basis).</p> <p>Members who reinstate their membership in the general class during the registration year pay a fee prorated on a quarterly basis.</p>
College of Traditional Chinese Medicine and Acupuncturists of Ontario	Yes	\$300	<p>.</p> <p>23% of the General class fee</p> <p>Additional fees:</p> <p>\$50 class transfer fee</p> <p>When a member transfers from one class to another, the fess shall be the difference between the two fees. If the transfer results in fees owing to the member, the College shall refund the prorated fee to the member.</p>