

2023 Fee Consultation – Summary of Stakeholder Comments

Background:

As part of RHRA's 2023 Fee Proposal Process, the organization solicited comments from interested parties, including licensees and sector stakeholders, its stakeholder advisory council, and resident network. This was a valuable part of the process and helped to inform decision-making to enable a balanced approach with careful consideration of the impact for each proposal.

The RHRA thanks all participants in its 2023 Fee Consultation. The RHRA 2023 Fee Proposal Public Consultation ran from Tuesday, August 23 – Wednesday, September 21, 2022. On Thursday, August 25, 2022, RHRA held a webinar for the sector, residents and members of the public to provide them with an overview of our fee review. Stakeholders were encouraged to submit comments through the RHRA website; however, feedback was also accepted through other channels (via email, meetings). RHRA's Stakeholder Advisory Council and Resident Network were consulted during meetings, resulting in documented feedback.

RHRA received submissions from a total of 13 submitters (representing licensees/operators, advisory councils, sector advocates and sector associations/business). Submissions to the consultation were shared and have been summarized into the themes below.

Themes:

Agree with proposed fee increases

- **Resident protection.** Fee increases are necessary for an effective regulator to protect vulnerable seniors; RHRA must have the resources needed to fulfil its mandate.
- **Increased Expectations and Requirements.** Acknowledged the need to increase fees to respond to increased requirements placed on the sector by government and increased expectations of RHRA.
- **Ongoing and Increased Operational Demands.** Acknowledged that there is increased operational demands for RHRA services and oversight, which must be balanced with required resources to ensure resident protection and compliance with the Retirement Homes Act.
- **Timing.** Those who agreed noted that it would be helpful to see a predictable 3-year fee increase and/or schedule

Opposed proposed fee increases

- **Affordability.** The proposed RHRA fee increase will negatively affect affordability of retirement homes and discourage people from choosing retirement homes as an option; residents will ultimately pay for the increase.
- **Financial strain.** The proposed fees may cause further financial strain for not-for-profit/smaller/rural homes who are already struggling with revenue, staffing and pandemic pressures. Increased fees (i.e. application fee) may deter new applicants for retirement homes and/or those who may want to expand their business.
- **Government funding.** An increase in requirements and reporting from the government suggests that the government should provide funding.

- **Modification to Operational Activities:** RHRA should reduce its operational activities based only on its available resources to avoid fee increases or modify its fees no more than inflation, regardless of demand.
- **Timing.** This increase comes at a difficult time for retirement homes given the affordability crisis, fueled by worldwide inflation.

ONLINE SUBMISSIONS STATISTICS

Note: a mixture of themes was present in each of the submissions below.

Fee Proposal #1:

Number of Submissions:

Licensees/Operators: 8
Residents/Family: 1
Senior Advocates: 1
Unknown: 1

Fee Proposal #2:

Number of Submissions:

Licensees/Operators: 9
Residents/Family: 1
Senior Advocates: 1
Unknown: 2

Fee Proposal #3:

Number of Submissions:

Licensees/Operators: 6
Senior Advocates: 1
Unknown: 1

Fee Proposal #4:

Number of Submissions:

Licensees/Operators: 5
Senior Advocates: 1

Fee Proposal #5

Number of Submissions:

Licensees/Operators: 5
Senior Advocates: 1
Unknown: 1

Fee Proposal #6

Number of Submissions:

Licensees/Operators: 6
Senior Advocates: 1

DIRECT SUBMISSIONS TO RHRA (via email/letter/meeting/etc. – outside of online submission form)

Note: a mixture of themes was present in each of the submissions below.

Number of Submissions:

Associations/Business: 1
Senior Advocates: 1
Advisory Councils: 2