



August 29, 2025

Daniel Faulkner
Registrar & Chief Executive Officer
Royal College of Dental Surgeons of Ontario
6 Crescent Road
Toronto, Ontario M4W 1T1

RE: *By-law amendments for annual membership fee increase*

Dear Daniel Faulkner,

As the voluntary professional association which represents the dentists of Ontario, promotes the highest standards of dental care, and advocates for accessible and sustainable optimal oral health for all Ontarians, the Ontario Dental Association (ODA) appreciates the opportunity to provide feedback to the Royal College of Dental Surgeons of Ontario (RCDSO) regarding proposed by-law amendments that would lead to a significant annual fee increase in 2026. The ODA urges the RCDSO to reconsider this proposal and to withdraw the proposed fee increase in full.

The RCDSO Council decided to completely divest from direct ownership and operation of the college's Professional Liability Program (PLP), citing reasons that included regulatory responsibility, conflict of interest, college integrity, business appropriateness, and financial risk. It is the ODA's understanding that the RCDSO has selected an as-yet unidentified third-party provider to take over its PLP and is finalizing legal agreements, with the intent that the full transfer will take place effective January 1, 2026.

Currently, the cost to register with the RCDSO is split between regulatory fees (\$2,170) and PLP-associated fees (\$1,000). As discussed at the June 19, 2025 [RCDSO Council meeting](#), it is the ODA's understanding that the proposed increase would apply solely to the PLP-portion of the fee, which will increase by \$500 to \$1,500, and that this is being collected on behalf of the new third-party provider.

A recent survey of the ODA membership has revealed that dentists are deeply concerned about the proposed fee increase related to the RCDSO's divestiture:

- Seventy-eight percent of respondents oppose the RCDSO's proposed by-law amendments related to the annual fee increase.
- A majority of respondents believe the proposed increase is too high.
- Four in 10 respondents expect the proposed fee increase to have a significant financial impact on them – especially for those who are new to practice.

Since the announcement of the PLP divestiture, we have heard concerns from members about the divestiture process of this critical program. The ODA has advocated for dentists every step of the way, including calling for an appropriate timeline, consideration of lower membership fees upon divestment, transparency, and a risk management approach during the review and transition. Dentists reasonably assumed the RCDSO's divestiture of the PLP would lower their registration costs – not increase them.

By-law amendments for annual membership fee increase

The RCDSO has stated that the rationale for the increase is that the PLP allocation of the fee has been artificially low and PLP costs are expected to increase. It is also our understanding that the RCDSO has expressed concerns about risk and uncertainty, particularly regarding its PLP claim reserve. Dentists deserve greater transparency, detailed cost breakdowns, and financial reporting regarding the RCDSO's divestiture of the PLP and fee hikes. We note that at its [June 19, 2025 Council meeting](#), the RCDSO reported that it ended 2024 with a surplus of \$8,935,550 – results that were \$6.8 million above budget. **At a time when the RCDSO is experiencing a significant surplus, the ODA strongly believes that the RCDSO's financial concerns should not be put on the backs of dentists through increased annual membership fees.**

This is not the first time significant PLP-related fee increases have been proposed. In 2022-2023, we heard concerns from members about a \$485 fee increase and shared this feedback with the RCDSO. **The ODA has consistently cautioned against fee increases.** In an environment of rising practice costs due to increased regulation and shortages of oral health human resources, the ODA is concerned about the cumulative impact of fee increases on practice sustainability and access to dental care. With access to dental care being a key focus of the RCDSO, we hope you will take these concerns seriously.

We strongly caution the RCDSO that its proposed fee increase will have unfair financial impacts, undermining practice sustainability for many dentists. The ODA represents more than 11,000 members, many of whom take on significant financial risk to operate local practices and provide essential oral health care to patients. Dentists make substantial investments in their education and their practices, often financed through borrowing and debt. Many of our members have expressed significant concerns about the excessive and unfair financial burden resulting from the proposed fee increase. Further, the existing annual fee structure may already penalize those who make few or no claims and does not reflect individual circumstances – particularly part-time, new, or semi-retired dentists, with some considering leaving the profession altogether or reducing their practice.

As considered by its Finance, Audit & Risk Committee, the RCDSO has the option of absorbing all or a portion of this increase internally. **The ODA urges the RCDSO to reconsider this option and withdraw the proposed fee increase in full.**

The ODA exists to serve the profession's interests. That is our sole purpose, as it has been for the past 158 years. With the support of our membership, the ODA continues to stand up for fairness, and the profession's interests and independence throughout the divestment process. As a strategic partner to the RCDSO, we would welcome the opportunity to continue dialogue on this matter to find a solution that is fair and agreeable to all.

Sincerely,



Dr. David Brown
Chair, Board of Directors
and President



Dr. Gerald Smith
Chair, Health Policy and Government Relations
Advisory Committee