



# **Costing in the Context of Fees**

Presented by Michel Pariseau 2019 FMI Annual Meeting November 19, 2019

YOUR HEALTH AND SAFETY ... OUR PRIORITY.

#### Purpose

- To discuss costing in the context of fees;
- To explain the relationship between costing and fees; and,
- To discuss the importance of costing.
- Not to provide a lesson on *how* to do costing.

**NOTE:** for the purposes of this presentation, the term "fee" includes, service fees, user fees, regulatory charges, levies, etc. It does not include fees by contract.

# Background

#### What we know

- FMI has been around since 1962;
- Fees have been around for decades;
- Approximately 8,500 fees spread out over 33 federal departments;
- Historically, estimated annual revenue generated is \$2+ billion, at a cost of about \$3+ billion (although these figures have changed recently).

#### Why is costing a concern?

Because the governance around fees has changed and, as a result, so have the expectations around revenue:

- Service Fees Act;
- Low-materiality Fees Regulations;
- Directive on Charging and Special Financial Authorities.

# **Fundamental Principles**

- Total recoverable costs = Direct costs + Indirect costs
- Total recoverable costs ≠ Total operational budget
- "Total recoverable costs" is the basis upon which the cost recovery rate is calculated.
- Costing exercise is separate and distinct from the pricing exercise.

**Pricing Decision** 



## Rule #1: Costing is a Fact-based Exercise

- Facts = cost inputs
- Which facts will be included?
  o And why?
- Do you have data?
  o Is it reliable?
- If no data, what's the plan?
- Measure the facts
- Document the process



- Consistency is key: align costing methodologies within programs, branches, departments and across federal departments, if possible.
- Own the method.
- Costing is the foundation to any fee.

# **Pricing is a Decision-based Exercise**

- Pricing = determination of fee amount, or fee-setting.
- All factors that go into pricing are based on decisions; except for costing, which is fact-based and the foundation upon which the pricing exercise is built.



#### **Rule #2: Precision and Accuracy are Key**



The greater the accuracy and precision in costing, the less vulnerable the fees – and the department – are to challenges.

# Rule #3: Costs are not Negotiable

#### Context

• When consulting on fee proposals, stakeholders may try to negotiate the fee amounts, often by questioning costing information.

**WARNING:** Do not fall for this tactic!

#### Considerations

- Consultations ≠ negotiations
- Industry and commercial stakeholders understand costing, and all of its implications, more than anyone else.
- Reminder: costing is fact-based, and those facts don't change.
- Flexibility is in respect of the proposed fee amounts, determined as a result of pricing exercise, not costs.



#### **Key Take-away Messages**

- Given the new policy and legal framework around fees and cost recovery in general, pressure will likely intensify regarding revenue.
- Departments that currently have fees may be directed to revise their fees/ cost recovery regimes (many have already started);
  - Departments that don't have any fees/cost recovery regimes may be directed to develop them, where appropriate.
- The first step in developing fees/cost recovery regimes is to do the costing exercise;
  - It is incumbent upon departments to be rigorous, accurate and precise, and comprehensive when undergoing a costing exercise.
- Your department's success in establishing fees/cost recovery regimes depends on a rational, methodical and rigorous approach.

# **Questions?**

#### Contact

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