



**Alberta Health
Services**

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RS-PSCTA-012

Canada's Top 100 Employers 2018 & 2019

Our File: E1907077

September 4, 2019

Standing Committee on Resource Stewardship
c/o Committee Clerk
3rd Floor, 9820 107 Street
EDMONTON AB T5K 1E7

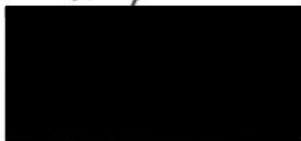
Dear Members:

Thank you for the opportunity to participate and provide updated feedback on the Public Sector Compensation Transparency Act (PSCTA).

We have reviewed the submission we provided on February 28, 2019 and believe it still reflects our recommended changes to the PSCTA. For your convenience, I have attached the written submission Alberta Health Services (AHS) made at that time.

Please contact me or Todd Gilchrist at todd.gilchrist@ahs.ca if the Committee has any questions relating to our submission.

Sincerely,



Verna Yli-Ma, MD, FRCPC
President and Chief Executive Officer

Attachment

C: Todd Gilchrist, Vice President - People, Legal & Privacy, AHS

February 28, 2019

AHS Response to the Review of the *Public Sector Compensation Transparency Act (PSCTA)*

Issue	Current State	AHS Recommendations
Creating Consistency in Transparency	<p>The PSCTA enables disclosure for municipalities and school boards, but there are no regulations yet in place to require them to do so.</p> <p>There are inequities in disclosure requirements amongst employers funded by public dollars. Including municipalities and school boards is consistent with disclosure requirements in other provinces.</p>	Enact regulation to require compensation disclosure by municipalities and school boards.
Creating Consistency in Timing of Disclosure	<p>The PSCTA requires entities to publish a full disclosure list by June 30 each year and a supplementary list of severances by December 31 each year.</p> <p>Currently, organizations disclose on different dates.</p>	Establish a set date for publishing the disclosure list. It provides predictability to internal disclosure communication and publishing processes.
Consolidating Multiple Disclosure Dates	The PSCTA requires a supplementary disclosure of severances (January to June) by December 31 each year. These severances are republished in the full June disclosure.	Combine the disclosure dates and only require one publication in June of each year.
Streamlining Disclosure Exemption Process	<p>The PSTCA allows employees to apply for exemption where disclosure could unduly threaten the safety of the employee.</p> <p>The deadline for submitting exemption applications to the Government of Alberta is November 1 of each year. This is before some employees know whether their compensation meets the disclosure threshold given employees receive their T4s in February.</p>	<p>Amend the exemption deadline to enable employees to determine if their compensation is above the threshold before the exemption deadline.</p> <p>Amending the deadline (e.g. early March) will ensure time for the Government of Alberta to review and for employers to remove exemptions from disclosure lists.</p>

Issue	Current State	AHS Recommendations
Clarify Exemption Criteria	Employees are not clear about the criteria for exemption.	Include examples of circumstances where exemption would be provided, and where exemption would not be provided in communication materials.
Disclose Health Providers' Compensation	<p>The PSCTA enables disclosure of information about funding received, payments made or benefits provided to health providers (e.g. physicians, midwives, etc.) in respect to publicly funded health services.</p> <p>No regulation is yet in place to require this disclosure.</p> <p>AHS discloses compensation paid to physicians that are employees and meet the threshold amount.</p>	Create regulation to extend disclosure to contractors and other health service providers.