



CONSULTATION: PRACTITIONER FEES

OUTCOMES OF THE CONSULTATION PUBLISHED NOVEMBER 2021

Tēnā koutou

Background

The Medical Sciences Council (the Council) is an independent statutory body appointed by the Minister of Health to apply the requirements of the Health Practitioners Competence Assurance Act 2003 in respect of medical laboratory science practitioners and anaesthetic technicians.

A consultation document proposing a 5% increase to the fees payable to the Council was published in November 2021. Feedback was sought from medical laboratory science practitioners, anaesthetic technicians, and associated stakeholder groups.

This report summarises the key themes of the feedback received and the final decision of the Council in terms of the revised fees to be charged to practitioners.

Consultation Feedback

A 4-week period was allowed for the consultation process with 30 responses received. This represents a response rate of less than 1% for the 4,681 practitioners who hold a current practising certificate in a medical laboratory science or anaesthetic technician scope of practice.

Despite the low response rate, the Council noted and took cognisance of several themes that were evident in the feedback:

- The Covid-19 pandemic continues to impact on people's financial stability with reduced household incomes, and a fees increase of this level (5%) would add to the stress levels of practitioners who are already stretched in terms of their work pressures
- While the proposed increase was aligned to inflation, practitioners' wages have not had a similar increase
- Other health profession groups (such as nurses) have a smaller APC fee
- There should be a differential scale for APC fees so those working less than fulltime and/or on a lower wage pay a smaller fee
- Some respondents perceived the Council as being a membership organisation
- It would be helpful if the Council provided more information on its financials

Consideration of Feedback Themes: Key Points

- The Council has resolved to increase practitioner fees by 3% rather than the originally proposed 5%.
- It is not possible to align regulatory fees with practitioner wages.
- The Council does not offer a scale of APC fees in accordance with practitioners' employment hours or wages.
- It is inappropriate to try and compare the fees paid by medical laboratory science practitioners and anaesthetic technicians with other regulated health professions in Aotearoa New Zealand.
- There is a difference in the APC fee for medical laboratory science practitioners and the APC fee for anaesthetic technicians which is primarily due to economies of scale.
- This is the first fees increase within the last 3-years.
- More detailed financial information is published each year in the Council's annual report which can be accessed on the website www.msccouncil.org.nz
- The Council is not a membership organisation.

Practitioner Fees Increase

Taking all feedback into consideration, the Council has resolved to increase fees charged to practitioners by 3% (rather than the originally proposed increase of 5%). For medical laboratory science practitioners this will mean an APC fee increase of **\$8.20** (compared to \$13.70 for a 5% increase). For anaesthetic technicians the APC increase is **\$10.90** (compared to \$18.20 for a 5% increase).

A summary of the fees schedule for the medical laboratory science profession is set out in Appendix 1 and will come into effect from 1st February 2022.

A summary of the fees schedule for anaesthetic technicians is set out in Appendix 2 and will come into effect from 1st February 2022.

Under the Health Practitioners Competence Assurance Act 2003, the revised fees will be published by way of Gazette notices at least 28 days before the implementation date.

Consideration of Consultation Feedback

In deciding to lower its proposed increase to practitioner fees from 5% to 3% the Council took cognisance of the consultation feedback that highlighted the ongoing financial impact the Covid-19 pandemic is having on many practitioners and their whanau.

With a lower increase to the annual fees for 2022/2023, the Council expects its operating deficit for the next financial year will be higher than anticipated. The Council is confident the deficit can be serviced through its reserve funds.

The Council expects that keeping the fees increase to the lower rate of 3% will mean an annual operating deficit of circa \$390k:

Medical Sciences Council		2022/2023 Draft Budget
Income		
APC		\$1,180,675
Registrations		\$163,006
Other		\$10,000
Total Income		\$1,353,681
Expenditure		
Board and Profession		\$541,490
Secretariat Services		\$1,203,008
Total Expenditure		\$1,744,498
Net Surplus/(Deficit)		-\$390,817

The Council made a number of observations in respect of the consultation feedback themes:

- It is not possible to align regulatory fees with practitioner wages. All operational revenue is derived from practitioner fees (there is no general taxpayer contribution to any of its operations) and the Council must ensure there is sufficient revenue each year to carry out their workplan to meet legislative obligations. Fees are therefore set in alignment with the business year (which runs from April to March) and at a level to enable ongoing business sustainability.
- The Council does not offer a scale of APC fees in accordance with practitioners' employment hours or wages. All aspects of regulation, and the frameworks required to manage that, apply equally to all registered practitioners irrespective of their employment terms and conditions.
- Each regulatory authority is responsible for setting the fees schedule for the practitioners they are responsible for regulating. Those fees will be set in alignment with the business circumstances for each individual authority. It is therefore inappropriate to try and compare the fees paid by medical laboratory science practitioners and anaesthetic technicians with other regulated health professions in Aotearoa New Zealand.
- There is a difference in the APC fee for medical laboratory science practitioners and the APC fee for anaesthetic technicians. This is primarily due to APC fees being the primary source of the Council's annual income, and economies of scale. There are significantly lesser numbers of anaesthetic technicians however, the regulatory framework requirements are no different and in accordance with Office of the Auditor General guidelines there can be no subsidisation of costs across the two different professions.

- Practitioner fees are reviewed on an annual basis and in 2018 the Council made a commitment to undertake more regular fees reviews to avoid potentially larger fee increases that are more likely with an intermittent review cycle. The Council has kept fees static for the previous two APC renewal years (2020/2021 and 2021/2022), this being in recognition of the disruptions and impact of the evolving global pandemic. Recognition of these impacts has been reiterated in this year's fees review with a decision to keep the increase at a lower level and thereby reducing the financial outlay for practitioners.
- In addition to the financial information included in this report, the Council publishes a set of audited financial statements each year which is available on the website at www.msccouncil.org.nz. The Council will also be publishing its updated 3-year strategic plan on the website in the next few weeks. This document sets out the various strategies and initiatives for meeting core regulatory functions which are funded through the practitioners' fees framework.
- Consultation feedback demonstrated that some respondents perceived the Council as a member organisation for the two professions (medical laboratory science and anaesthetic technology). This is incorrect. The Council is an independent statutory body appointed by the Minister of Health to apply the requirements of the Health Practitioners Competence Assurance Act 2003 in respect of medical laboratory science practitioners and anaesthetic technicians. The fundamental purpose of the Council is to protect the health and safety of the Aotearoa New Zealand public by providing mechanisms for practitioners from these two professions to demonstrate they are competent and fit to practise. The Council has a responsibility to ensure their legislative functions are carried out consistently, fairly, and proportionately.

Conclusion

The Medical Sciences Council would like to take this opportunity to thank those individuals who took the time to read and respond to the consultation document on its 2021 review of fees payable by medical laboratory science and anaesthetic technology practitioners.

Nāku noa nā



Mary Doyle
Chief Executive

Appendix 1: Schedule of Fees for Medical Laboratory Science Practitioners

The following fees will come into effect from 1st February 2022. All fees are stated inclusive of GST

Medical Laboratory Science Practitioners		
Fee Type	Current	From 1 st February 2022
Registration Fee		
NZ graduate	\$370.00	\$381.10
Overseas graduate	\$580.00	\$597.40
Additional scope	\$105.00	\$108.15
Annual Practising Certificate (APC)		
Renewal of APC received by 31 March	\$274.00	\$282.20
Renewal of APC received after 7 April	\$384.00	\$395.50
Application for an initial or Return to Work APC received between 1 April to 30 September	\$274.00	\$282.20
Application for initial or Return to Work APC received between 1 October to 31 March	\$137.00	\$141.10
Application for initial or Return to Work APC received between 1 February to 31 March	\$0.00	\$0.00
Supply of Documents		
Registration certification/re-issue of registration certificate	\$61.00	\$62.80
Letter of good standing	\$61.00	\$62.80
Restoration to the register	\$61.00	\$62.80
Examinations		
Online Examination	\$2,496.00	\$2,570.90

Appendix 2: Schedule of Fees for Anaesthetic Technicians

The following fees will come into effect from 1st February 2022. All fees are stated inclusive of GST

Anaesthetic Technicians		
Fee Type	Current (GST inclusive)	From 1 st February 2022
Registration Fee		
NZ graduate	\$370.00	\$381.10
Overseas graduate	\$580.00	\$597.40
Annual Practising Certificate (APC)		
Renewal of APC received by 31 March	\$364.00	\$374.90
Renewal of APC received after 7 April	\$510.00	\$525.30
Application for an initial or Return to Work APC received between 1 April to 30 September	\$364.00	\$374.90
Application for initial or Return to Work APC received between 1 October to 31 March	\$182.00	\$187.50
Application for initial or Return to Work APC received between 1 February to 31 March	\$0.00	\$0.00
Supply of Documents		
Registration certification/re-issue of registration certificate	\$61.00	\$62.80
Letter of good standing	\$61.00	\$62.80
Restoration to the register	\$61.00	\$62.80
Examinations		
Online Examination	\$2,496.00	\$2,570.90