MEDICAL SCIENCES COUNCIL
OF NEW ZEALAND
TE KAUNIHERA PŪTAIAO HAUORA O AOTEAROA

Consultation - Proposed fees for 2027/28 - medical laboratory science practitioners

October 2026

Executive summary

Te Kaunihera Pūtaiao Hauora O Aotearoa | The Medical Sciences Council (the Council) is a responsible authority under the Health Practitioners Competence Assurance Act 2003 (HPCA/the Act). The Council charges fees for services provided to practitioners and may impose a levy to meet the costs of disciplinary matters.

The Council is proposing to increase fees for the 2027/28 practising year to meet the rising cost of carrying out its regulatory functions. The full schedule of proposed fees is set out in Appendix A.

The main proposed changes are:

- An increase in the annual practising certificate (APC) fee to **$470.00,** inclusive of GST.
- An increase in the annual disciplinary levy to **$70.00,** inclusive of GST.
- Specify a fee (**$150.00** per hour) for accreditation and monitoring of programmes of education*.

The Council is consulting on proposed fee changes to medical laboratory science practitioner (MLS) fees for the 2027/28 practising year and invites submissions from interested parties (practitioners and stakeholders). The easiest way to make a submission is by completing the online survey.

All submissions will be considered before the Council makes a final decision. Practitioners will be advised of the outcome - any fee changes will be published in the New Zealand Gazette and on the Council's website under Resources and publications>Secondary legislation | Gazette notices.

Background

The Council is responsible for protecting the health and safety of the public by ensuring the practitioners it regulates are competent and fit to practise. To carry out its regulatory functions, the Council sets fees for the services it provides. In addition, The Council may set and collect a disciplinary levy when required to recover disciplinary costs when required.

What the Council does

The Council's functions are set out in section 118 of the Act. Its work includes both long-term strategic initiatives and day-to-day regulatory activities.

Strategic priorities

The Council's current key strategic priorities include:

- Improving the regulatory framework it is responsible for setting regarding the medical laboratory professions.
- Considering the role that practitioners and the Council play regarding cultural competence within practice and issues of equity.

- Continuing to develop a stronger approach to the use of data.

Key projects

The Council needs to be a responsive regulator and ensure that its strategic projects can be carried out in a timely manner. Currently, it is progressing work on the medical laboratory scope of practice project which includes development of revised standards of competence, as well as consideration of new scopes of practice for specialist scientists. This work takes time and needs to be resourced appropriately.

The Council has recently reviewed the documentation it holds on practitioners and is in the final stages of a digitalisation project for this. The Council is also involved in work around ensuring compliance with the Secondary Legislation Act (2021) and considering the implications of the Government's Health Practitioners Competence Assurance Amendment Bill.

Summary of progress during the last year includes:

- Decisions on the future scope of practice for the medical laboratory science profession.
- Consideration of the need for regulation of practitioners undertaking specialised practice.
- Review of the processes supporting the online examination, and implementation of an examination committee to oversee it.
- Implementation of Te Ama Tōtika (the Council's Māori Practitioners Advisory Committee), and inclusion of cultural competency recommendations and advice in all regulatory and practice matters.
- Updating operational systems, such as implementation of a new online practitioner database and a new online portal to manage practitioner registration, recertification, examination and annual practising certificate processes; and a new finance system integrated with the portal for managing practitioners' payments.
- Digitising historic Council and practitioner records to ensure continued compliance with the Privacy Act 2020.

Business as-usual-activities

The Council's day-to-day regulatory work includes, amongst other things:

- Processing applications for registration which often involves collaboration of multiple people, including professional and regulation advisors.
- Processing applications for practising certificates – while the vast majority require no intervention, a number require review and consideration by staff.
- Administering recertification programmes and auditing compliance.
- Monitoring programmes of education that lead to registration as a medical laboratory practitioner.
- Liaising and communicating with practitioners.
- Managing concerns about practitioners' competence, health and/or conduct. The number and complexity of competence, health and conduct matters vary from year to year. Outcomes range from the Council taking no regulatory action, through to managing a matter in full. This can include a competence review, referral for assessment of a practitioner's health and ability to practise, or referral of a conduct matter for investigation by a Professional Conduct Committee.

Further information about the work of the Council can be found in its Performance Review Report on the website.

How the Council is funded

Main budget

Most of the Council's income comes from fees for practising certificates, with the bulk received during February and March each year. As part of its budget process, the Council projects annual income from current practitioner numbers, the competence and disciplinary matters it is managing, and other known factors.

Through its budgeting, expenditure and cashflow processes, the Council must hold enough funds to operate through the year, and enough reserves in case of unexpected matters. It also must allow for changes in the number of practitioners renewing a practising certificate, variation in the number and type of conduct matters that must be investigated, and external factors that affect how many practitioners seek registration.

The Council is a multi-profession regulator and provides services to two professions (Medical Laboratory Scientists and Anaesthetic Technicians). Staff move between the work required for each profession, which supports a more efficient use of resources. The Council recognises the financial pressure on practitioners and seeks to balance affordability with the need to maintain effective and sustainable regulatory services.

Independent financial advice in 2024 indicated that fee increases above the Consumer Price Index (CPI) were needed to manage the Council's financial position and improve its ability to carry out its core functions. Consequently, increases were implemented between 2024 and 2026. Further increases are now proposed. Costs have continued to rise across the Council's activities since the last fees review. The largest costs are for operations and for strategic work, including the ongoing work following the scope of practice review.

Disciplinary levy

In addition to its main budget, the Council holds a separate budget funded by the disciplinary levy. Under legislation, this levy may be used only for disciplinary matters and must be ringfenced/set aside from the main budget. While outcomes from disciplinary matters vary in some cases, investigation can lead to charges being laid before the Health Practitioner's Disciplinary Tribunal.

If the Tribunal makes an order for costs against a practitioner, some costs may be recovered. The Council must still meet all costs incurred to that point, and recovery is not guaranteed. The last case at the Tribunal involving a practitioner from the medical laboratory profession resulted in no recovery of costs to the Council even though the prosecution was successful. Even in years when no matters are referred to the Council or the Tribunal, the Council must contribute to the Tribunal's running costs. It must also fund education for practitioners appointed to sit on the Tribunal. The Council therefore needs to hold sufficient funds to meet these obligations as they arise.

How fees are presented

The Regulations Review Committee is an independent committee of Parliament responsible for reviewing regulations. As a responsible authority, the Council is able to set fees through the HPCA Act. The Committee has reviewed the Council's published fees, with particular attention to the use of the term 'cost recovery'.

Specified fee*

'Cost recovery' meant education providers were billed directly for the actual costs incurred during accreditation or monitoring of qualifications prescribed by the Council. Following the review, the Council has been advised that a fee described as 'cost recovery' must instead be set as a specific fee or hourly rate.

The Council is required to publish a specific fee in the New Zealand Gazette for the accreditation and monitoring of programmes of education.

Previously a fee has been charged – to the organisation (education provider) - for accreditation activities, on a cost-recovery basis. The Council proposes to replace this with an hourly rate per person involved in this process. The hourly rate would also be charged for staff time, as this is work that staff are undertaking directly related to these processes. The fee does not include additional expenses, such as travel and accommodation, where a panel visit is required, as these would be recovered separately.

Ongoing monitoring of accredited programmes also uses the Council time and resources, and may also include a monitor, who is a person engaged to monitor a programme and provide advice and reports to the Council. The Council proposes to charge providers directly for this work, again at an hourly rate that includes staff costs. The Council is aware that this may increase the cost to education providers of having their programmes monitored.

The Council's audited financial statements are available in its annual reports and on the Charities Services register.

Proposed fee changes for 2027/28

As part of this consultation, the Council proposes to increase medical laboratory science practitioner fees for the 2027/28 practising year. The increases are intended to meet the ongoing cost of delivering the Council's regulatory functions and responsibilities.

For most practitioners, the main changes would be:

- an APC fee of **$470.00,** inclusive of GST
- an annual disciplinary levy of **$70.00,** inclusive of GST.

The Council is also proposing to introduce and officially publish a fee for accrediting and monitoring education programmes. The proposed fee* is **$150.00** per hour (including GST).

Appendix A contains the full schedule of current and proposed fees.

Frequently asked questions

What do the fees cover?

The fees pay for the Council's work in regulating the profession. This includes services provided to individual practitioners, as well as activities that support and protect the public.

Who pays accreditation and monitoring fees?

Fees for accrediting and monitoring education programmes are paid by the education provider.

What will the proposed increase in fees be used for?

The proposed increases would help the Council meet the full cost of delivering its services and fulfilling its statutory responsibilities under the Health Practitioners Competence Assurance Act. Funding would also support strategic initiatives, including work exploring new scopes of practice for specialist scientists.

A fee increase will help cover the Council's operating costs. The proposed increase for 2027/28 will not cover all forecast costs, so the Council will use some of its reserves to make up the shortfall and keep the increase as low as practical.

The Council ran an operating deficit in 2025/26 and expects to run another in 2026/27, meaning its costs have been higher than its income.

What is a disciplinary levy used for?

The disciplinary levy pays for the costs of managing serious concerns about a practitioner's conduct. This includes investigations, disciplinary processes, and hearings before the Health Practitioners Disciplinary Tribunal.

These costs are shared across the profession through the levy, although some costs may later be recovered from a practitioner if charges are upheld.

The levy also helps fund the Council's annual contribution to the Health Practitioners Disciplinary Tribunal, including the education of Tribunal members.

Why do practitioners under investigation not pay the disciplinary costs?

Practitioners under investigation are not required to pay disciplinary costs because an investigation is needed to determine whether there is a case to answer. At that stage, no findings have been made, and no charges may have been proven. The Council must therefore fund the investigation and disciplinary process as it occurs.

The costs of these processes are shared across the profession through the disciplinary levy. If charges are later proven before the Health Practitioners Disciplinary Tribunal, the Tribunal may order the practitioner to contribute to or reimburse some of the costs.

How does the Council minimise costs?

The Council regularly reviews its operations to make sure it uses its resources efficiently and provides value for money.

One of the main ways the Council keeps costs down is by sharing secretariat services with the Medical Radiation Technologists Board (MRTB). This shared arrangement helps reduce costs by allowing both organisations to share staff, office space, and IT systems.

Why does the Council hold reserves?

The Council holds reserves to help make sure it can continue operating if costs increase or income is lower than expected. Reserves also provide funding for unexpected or significant expenses, such as the costs of disciplinary matters.

What development initiatives are planned?

The Council's planned initiatives for 2027/28 include supporting the development of medical laboratory science practice, consideration of how its work can better support equity and strengthen relationships with all stakeholders, and the development of scopes of practice for specialist scientists and reviewing the standards of accreditation and monitoring of programmes that lead to registration as medical laboratory science practitioner.

What IT projects need to be funded?

The Council must continue investing in secure and effective technology to support its regulatory work and protect practitioner information. In 2027-2028, it plans to modernise its Microsoft environment, including replacement of historic/ physical servers and associated applications with cloud-based solutions, continue to update and modernise its website and practitioner portal.

The Council is also committing to align its protective security arrangements with the Government's Protective Security Requirements. This covers governance, personnel, information and physical security. It will keep assessing its current position against those requirements, tracking gaps, and lifting cyber compliance over time.

Feedback and submissions

This consultation is open to all registered and practising medical laboratory science practitioners. The consultation document has been sent to practitioners, shared with key organisations, and published on the Council's website.

The Council welcomes feedback/submissions from practitioners and interested organisations. All feedback will be considered before a final decision is made. If any fees are changed, practitioners will be notified and the new fees will be published in the *New Zealand Gazette*.

Privacy note: Because this is a public consultation, the Council may publish feedback on its website. If feedback from an individual is published, personal and contact information will be removed.

Closing date: 11.59 pm, Wednesday 25 November 2026.

How to submit: Complete the online survey on our website – available under the **News** and **Consultation** pages. The survey questions are also in Appendix B.

Questions: If you have any questions, please email mscconsultations@medsci.co.nz using the subject line **MLS fees consultation 2027/28**.

Ngā mihi

Dr Susan Calvert
Chief Executive

Appendix A

Schedule of proposed fees

Medical Laboratory Science Practitioners			
Fee type	**Current (GST inclusive)**	**Proposed (GST exclusive)**	**Proposed (GST inclusive)**
Registration Fee			
Registration fee (Aotearoa New Zealand graduate)	529.00	$513.04	$590.00
Registration fee (internationally qualified)	828.00	$800.00	$920.00
Additional scope	150.00	$147.83	$170.00
Annual Practising Certificate (APC)			
Renewal of APC received by 31 March	392.00	$408.70	$470.00
Renewal of APC received after 7 April	549.00	$530.43	$610.00
Application for an initial or Return to Work APC	392.00	$408.70	$470.00
Application for a first practising certificate for an Aotearoa New Zealand graduate between 1 December and 31 March each year.	196.00	$204.35	$235.00
Supply of Documents			
Registration certification/re-issue of registration certificate	88.00	$86.96	$100.00
Letter of good standing	88.00	$86.96	$100.00
Restoration to the register	88.00	$86.96	$100.00
Online Examination Fee	3394.60	$3252.17	$3740.00
Annual Disciplinary levy	57.50	$60.87	$70.00
Accreditation and monitoring			
Accreditation of programmes ($/hour)	“at cost”	$130.43	$150.00
Ongoing monitoring ($/hour)	“at cost”	$130.43	$150.00

Appendix B

Te Kaunihera Pūtaiao Hauora O Aotearoa | The Medical Sciences Council (the Council) is proposing changes to practitioner fees for the 2027/28 year and invites your feedback. You can share your views by completing our survey.

You can find more information about the proposal, including the proposed fee changes and a list of Questions & Answers, in the consultation document on the **News** and **Consultation** pages of our website.

The Council may publish some or all of your feedback/submissions on our website. Where feedback/submissions are made by individuals, personal and contact information will be removed before publication.

For your information – the survey questions are listed below:

1. Your name:

2. What scope of practice are you practising in?
- 2.1. Medical Laboratory Pre-Analytical Technician (MLPAT)
- 2.2. Medical Laboratory Technician (MLT)
- 2.3. Medical Laboratory Scientist (MLS)
- 2.4. I am a registered medical laboratory science practitioner, but I am not practising at this time.
- 2.5. I am not a registered medical laboratory science practitioner.

3. Are you completing this survey as an individual or on behalf of an organisation?
- 3.1. If you are completing this survey on behalf of an organisation, please name the organisation.

4. The Council is proposing to increase practitioner and applicant fees for the 2027/28 practising year. After reading the consultation document do you Agree / Disagree with the proposal that the Council should:
- 4.1. Increase the fees overall as per the schedule in Appendix A?
- 4.2. Set a fee for the accreditation and monitoring of programmes of education of **$150.00** including GST per hour?

5. What matters do you think the Council should consider when reviewing fees?

6. Is there anything in the consultation document that you would like further clarification on?