



Consultation

Practitioner Fees

NOVEMBER 2023

Introduction

Te Poari Ringa Hangarau Iraruke | The Medical Radiation Technologists Board (the Board), as a responsible authority under the Health Practitioners Competence Assurance Act (2003), has the ability to set fees for services provided to practitioners. The Board also has the ability to impose a levy to pay for disciplinary matters.

The Board is proposing to increase fees and is consulting with the profession about this. In summary proposed changes are as follows:

- a. An increase in all fees including that paid for a practising certificate. For practitioners this will mean an increase in the practising certificate fee from \$469.30 to \$495.00
- b. Removal of a reduced practising certificate fee for practitioners who apply for a practising certificate after 30 September
- c. Introduction of a reduced practising certificate fee for new graduates entering the Register and applying for their first practising certificate between December – March each year for the current practising year
- d. Introduction of a disciplinary levy

The Board will advise practitioners of the outcome of this consultation and any changes to fees will be published in the New Zealand Gazette.

Background

Te Poari Ringa Hangarau Iraruke | The Medical Radiation Technologists Board (the Board), as a responsible authority under the Health Practitioners Competence Assurance Act (2003), has the ability to set fees for services provided to practitioners. The Board also has the ability to impose a levy to pay for disciplinary matters. The Board is proposing to increase the fees paid by practitioners and is consulting with the profession and key stakeholders before it makes a decision on this proposal.

The functions of the Board are described in [section 118 of the Health Practitioners Competence Assurance Act](#). The work undertaken by the Board in enacting these functions is divided into strategic work and its business-as-usual activities. Strategic work is underpinned by the [Board's strategic plan](#). The Board has three main focus areas for 2023-2026; these are:

1. Alignment of regulatory frameworks
2. Meeting its obligations as a Tiriti o Waitangi Partner
3. Data strategy.

Progress has been made on all strategic priorities over the course of 2023 and this includes the successful development of the Māori practitioner advisory committee, the purpose of which is to provide advice to the Board. Further, the Board has re-commenced its review of the Scopes of Practice.

In addition to its strategic work the Board must maintain its core regulatory work which includes processing registration and practising certificate applications, recertification and audit as well as managing competence, health and conduct matters. It is often hard to predict the number of cases that will be received each year, and the Board must ensure that sufficient funds are allocated for these purposes.

The Board's income is derived mostly from fees associated with the issuing of practising certificates with the majority of income received in February – March of each year. As part of its budget processes, the Board makes a projection of expected annual income based on current volumes of practitioners, the number of matters it is managing related to competence and discipline, and other factors. The Board must ensure through its budgeting, expenditure and cashflow processes that it has sufficient funds in order to operate each year, and that it has sufficient reserves to take into account unexpected matters such as a decrease in the number of practitioners applying to renew practising certificates, variation in the number and type of professional conduct matters that it must investigate as well as external factors that impact on the number of practitioners seeking registration.

The Board has a [reserves policy](#) which it uses to guide its decision making around the levels of funds that it holds. The Board is also mindful of the cost of providing services and must make sure when making decisions that there is a prudent and judicious use of practitioner funds. Notwithstanding these constraints, the Board must also operate within the current regulatory and economic environment. Accordingly, in order to maintain the appropriate level of reserves and its financial sustainability, the Board must adjust its fees in order to ensure that it can provide required services.

Proposal

Te Poari Ringa Hangarau Iraruke | The Medical Radiation Technologists Board (the Board) is making a number of proposals around fees paid by practitioners which are as follows:

1. The Board is proposing to increase practitioner fees effective for the 2024-2025 practising year. In this instance it is proposing to increase all fees. While fees have been kept the same over the last few practising years, the proposed fee increases are necessary for the Board to meet the ongoing costs of delivering its regulatory functions and responsibilities. This proposed increase would see the annual practising certificate (APC) fee increase from the current \$469.20 to \$495.00 (inclusive of GST). A table of proposed fee changes is included as Appendix A
2. The Board is also proposing to remove reduced fees for practising certificates for those practitioners who apply after 30 September each year.
3. The Board is proposing to introduce a reduced practising certificate fee for graduate medical imaging technologists and radiation therapists who enter the Register on completion of their pre-registration programme of education between December and March each year. This is a one-off reduced fee in recognition of their transition from undergraduate student to graduate and registered practitioner and will only be available in the year of graduation. If a graduate applies for their first practising certificate in order to practise after 1 April, they will not be eligible for the reduced fee.
4. The last proposal that the Board is seeking submissions on relates to the introduction of a standalone fee to fund matters of discipline. A disciplinary levy is used to fund cases that are referred to a Professional Conduct Committee and any costs associated with the Health Practitioner Disciplinary Tribunal. At this time the Board is proposing to introduce a fee of \$34.50 (including GST) per practitioner.

Frequently asked questions

What will the increased fees be used for?

The proposed fee increases are necessary for the Board to meet the full operational and capital expenditure costs to deliver the functions and responsibilities required of them under the Health Practitioners Competence Assurance Act 2003 (HPCA Act). The Board needs to invest in capital projects to ensure that it has the infrastructure required to support the timely and effective regulation of practitioners. The Board is aware of its obligations to keep practitioner information safe and needs to invest further in its information security. This includes ensuring it has effective cyber security and the correct information privacy procedures in place. Investment required for capital projects is budgeted to be around \$100,000.

There have been gradual increases in costs across all Board activities since the last fees review. The biggest costs are for operations and strategic-focused projects such as strengthening our regulatory work within the context of Te Tiriti o Waitangi and the scopes of practice review. While the Board has seen an increase in the number of applicants applying for registration, it has also seen an increase in activity with its practitioner engagement. This has meant that staff are spending more time working with and supporting practitioners with requests and information sharing rather than routine operational processes.

The Board needs to be a responsive regulator and ensure that its strategic projects can occur in a timely manner. At this time, it has re-commenced the work on the scopes of practice review. This work is integral to the regulation of all professions and the project is a key priority. Undertaking scope reviews are complex projects which can have many impacts, not only for the profession but also for the policies and procedures that are part of the routine work of the Board. These projects take time and need to be resourced appropriately.

Underpinning all this work is the Board's need to ensure that the scope and competence standards enable effective interaction with Māori. The development of the Māori Practitioner Advisory Committee and a desire to effectively engage with Māori practitioners requires the Board to support this rōpū. The Board also has a need to ensure that the people providing its services work in ways that are culturally safe and is therefore strengthening its regulatory work with a focus on Te Tiriti o Waitangi.

The cumulative effect of the fee increases will not cover all forecasted costs and the Board expects to have an annual operational deficit of circa \$254,000 for the 2024-2025 financial year. However, the Board is committed to keeping fee increases at an affordable level for practitioners, and the expected annual deficit is manageable due to the Board having a reasonable level of reserve funds.

Why are you removing the reduced fee for practitioners who only work part of the year?

While practitioners may only work part of the year, the cost of providing services does not reduce. The Board is mindful that in providing a reduced fee for some practitioners, others may be subsidising the true cost.

Why are you introducing a different practising certificate fee for new graduates entering the profession?

The fee for new graduates recognises that they have just completed an undergraduate programme of education with associated costs, that they have less resources than employed registered practitioners, they have applied, paid for and been granted registration as a health practitioner and are now entering the workforce.

What is a disciplinary levy used for?

This year the Board is proposing that it include an additional disciplinary levy on top of the practising certificate fee. Money received from this levy can only be used to fund disciplinary processes. This levy is a single fee that is used for practitioners referred to a professional conduct committee and to the Health Practitioners Disciplinary Tribunal. When a practitioner is referred to a discipline process the profession must pay for this. Currently this comes from the general practising certificate fee.

Each year the Board must also pay a fee to the Tribunal in order to fund it. This is based on a per practitioner basis and is payable regardless of the number of cases that may have been referred to the Tribunal. In addition, a fee is payable to the Tribunal in order to fund education for profession specific tribunal members.

If established, and before it charges the fee again, the Board will assess the level of reserves it holds in its disciplinary fund against projected costs for disciplinary matters.

What does the Board do to minimise costs?

The Board continually reviews its operations within best-value-for-money principles and in alignment with the good practice guidelines presented by the Office of the Auditor-General and the Treasury. A core strategy that has enabled the Board to keep its fees at a significantly lower level when compared to other similar sized regulatory authorities is its partnership arrangement with the Medical Sciences Council, whereby secretariat services are shared. This allows the Board to realise benefits such as more efficient staffing resources and the sharing of office accommodation, and a common IT infrastructure.

Why does the Board have reserve funds?

Having a reasonable level of reserves is essential for the Board's financial viability. Under the HPCA Act the Board must fund its operations through a cost recovery model. As it receives no government funding it is reliant on practitioner fees to fund our operations. Our reserves policy can be found [here](#).

Are there any developmental initiatives the Board needs to fund?

The Board has a number of important developmental initiatives that will progress during 2024- 2025 and many of them have been outlined in this paper. Its initiatives include meeting its obligations to contribute to the national drive for demonstrable and sustainable improvements to health equity and culturally safe health services. The Board will also continue to improve its engagement with stakeholders.

Are there any capital projects that the Board needs to fund?

As with any organisation there is a need to consider investment in information technology and information security. The Board has recently commenced an information management project which has looked at the information it holds and the processes around its management. The Board needs to ensure that it has a robust, efficient information technology system and infrastructure to support its regulatory functions. During 2024-2025 the Board plans to review this.

Feedback and submissions

The consultation document will be sent to all registered and practising medical imaging and radiation therapy practitioners. It will also be sent to a number of key stakeholder organisations and will be available on the [Board's website](#). The Board invites all practitioners and organisations with an interest in this matter to provide comments and make submissions.

The Board will consider all submissions and feedback received before a decision is made on the proposed fees that are presented in this document. Any decision will then be communicated to practitioners and if a change is to be made then a notice will be placed in the New Zealand Gazette.

Submissions must be received by **5pm on Wednesday, 6 December 2023**

Submissions can be made by completing the survey found [here](#).

If you have any questions please email mrt@medsci.co.nz with subject line **MRTB Fees Consultation**.

Ngā mihi



Dr Susan Calvert

Chief Executive

Appendix A

Fee type	Current (GST inclusive)	Proposed (GST inclusive)
Registration Fee		
NZ graduate	371.30	395.00
TTMRA	371.30	395.00
Overseas graduate	848.60	895.00
Additional scope	202.00	215.00
Annual Practising Certificate (APC)		
Renewal of APC received by 31 March	469.20	495.00
Renewal of APC received after 7 April	655.90	690.00
Application for an initial or Return to Work APC received between 1 April to 31 March	469.20	495.00
Supply of Documents		
Registration certification/re-issue of registration certificate	63.20	67.00
Letter of good standing	148.90	157.00
Restoration to the register	53.00	56.00
Registration Examination Assessment (REA)	2,779.50	2,920.00
Online Examination	2,497.00	2,625.00
New Fees		
New Zealand graduate first APC on completion of programme of education	-	250.00
Disciplinary levy	-	34.50