



PRACTITIONER FEES REVIEW

OUTCOMES OF THE CONSULTATION PUBLISHED IN NOVEMBER 2021

Tēnā koutou

Background

A consultation document proposing a 5% increase to the fees payable to the Medical Radiation Technologists Board (the Board) was published in November 2021. Feedback was sought from medical imaging and radiation therapy practitioners and associated stakeholder groups.

This report summarises the key themes of the feedback received and the final decision of the Board 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, 2 of those being from representative organisations (a professional body and an industrial employment organisation). 3,325 practitioners hold a current practising certificate in a medical imaging or radiation therapy scope of practice.

While the response rate from individual practitioners was very low (<1%), the Board acknowledges the responses received from the two organisations were provided on behalf of their respective memberships.

Several themes 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
- Regulatory fee increases should be aligned to wage increases being negotiated by the unions
- 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 pay a smaller fee
- The frequency of fee increases is not acceptable
- Some respondents perceived the Board as being a membership organisation
- It would be helpful if the Board provided more information on its financials

Practitioner Fees Increase

Taking all feedback into consideration, the Board has resolved to increase fees charged to practitioners by 2% (rather than the originally proposed increase of 5%). This will mean an increase of \$9.20 (GST inclusive) for an APC fee. In comparison the originally proposed 5% increase would have seen a \$23 increase to the APC fee.

A summary of the fees schedule for medical imaging and radiation therapy practitioners is set out in Appendix 1 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 a Gazette notice at least 28 days before the implementation date.

Consideration of Consultation Feedback

The Board's decision to lower its proposed increase to practitioner fees from 5% to 2% took cognisance of the consultation feedback that highlighted the ongoing financial impact the Covid-19 pandemic is having on many medical imaging and radiation therapy practitioners and their whanau.

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

The Board expects that keeping the fees increase to the lower rate of 2% will mean an annual operating deficit of circa \$335k:

Medical Radiation Technologists Board 2022/2023 Draft Budget	
Income	
APC	\$1,257,926
Registrations	\$201,930
Other	\$10,000
Total Income	\$1,469,856
Expenditure	
Board and Profession	\$602,335
Secretariat Services	\$1,203,008
Total Expenditure	\$1,805,343
Net Surplus/(Deficit)	-\$335,487

In respect of the other consultation feedback themes, the Board made a number of observations:

- It is not possible to align regulatory fees with practitioner wages, nor to align the fees review schedule with industrial negotiations. The Board derives all its operational revenue from practitioner fees (there is no general taxpayer contribution to any of its operations) and must ensure it has 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.
- 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 imaging and radiation therapy practitioners with other regulated health professions in Aotearoa New Zealand. Likewise, comparing the fees paid by Aotearoa New Zealand medical imaging and radiation therapy practitioners with their Australian colleagues is not appropriate.
- The Board does not offer a scale of APC fees in accordance with practitioners' employment hours. All aspects of regulation, and the frameworks required to manage that, apply equally to all registered practitioners irrespective of their employment terms and conditions.
- Practitioner fees are reviewed on an annual basis and in 2018 the Board 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 Board noted that fees have been kept 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 Board publishes a set of audited financial statements each year which is available on the website at www.mrtboard.org.nz The Board 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.
- It was noted that some respondents perceived the Board as a member organisation for medical imaging and radiation therapy practitioners. This is incorrect. The Board 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 imaging and radiation therapy practitioners. The fundamental purpose of the Board is to protect the health and safety of the Aotearoa New Zealand public by providing mechanisms for medical imaging and radiation therapy practitioners to demonstrate they are competent and fit to practise. The Board has a responsibility to ensure their legislative functions are carried out consistently, fairly, and proportionately.

Conclusion

The Medical Radiation Technologists Board would like to take this opportunity to thank those individuals and groups who took the time to read and respond to the consultation document on its 2021 review of fees payable by medical imaging and radiation therapy practitioners.

Nāku noa nā

A handwritten signature in black ink, appearing to read "M Doyle". The signature is written in a cursive, flowing style.

Mary Doyle
Chief Executive

Appendix 1: Schedule of Fees for Medical Imaging and Radiation Therapy Practitioners

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

Fee Type	Current	From 1 st February 2022
Registration Fee		
NZ graduate	\$364.00	\$371.30
TTMRA	\$364.00	\$371.30
Overseas graduate	\$832.00	\$848.60
Additional scope	\$198.00	\$202.00
Annual Practising Certificate (APC)		
Renewal of APC received by 31 March	\$460.00	\$469.20
Renewal of APC received after 7 April	\$643.00	\$655.90
Application for an initial or Return to Work APC received between 1 April to 30 September	\$460.00	\$469.20
Application for initial or Return to Work APC received between 1 October to 31 March	\$230.00	\$234.60
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	\$62.00	\$63.20
Letter of good standing	\$146.00	\$148.90
Restoration to the register	\$52.00	\$53.00
Examinations		
Registration Examination Assessment (REA)	\$2,725.00	\$2,779.50
Online Examination	\$2,448.00	\$2,497.00