



New Zealand  
**Medical Radiation  
Technologists Board**  
*Te Poari Ringa Hangarau Iraruke*

# Fees Consultation Outcome 2024

## Medical Radiation Technologists Board

### Outcome of consultation for proposed changes to practitioner fees

This consultation ran from 6 November to 6 December 2023, proposing new fees for both medical imaging and radiation therapy practitioners. A total of 156 responses were received, 155 were from individuals, and one was from an organisation.

Thank you to those individuals who took the time to read and respond to the [consultation document](#) on its review of fees, payable by medical imaging and radiation therapy practitioners. In making a decision around the fees increase, the Medical Radiation Technologists Board (the Board) was provided with summary statistics from the consultation responses, as well as all written feedback to the proposals.

Based on the responses the outcome determined by the Board is for -

- an increase in all fees
- changes to time periods for reduced practising certificate fees, for practitioners who apply after 1 December each year
- removal of zero practising certificate fees for those practitioners applying for a first, or return to practice, 'practising certificate' after 1 February each year
- introduction of a disciplinary levy.

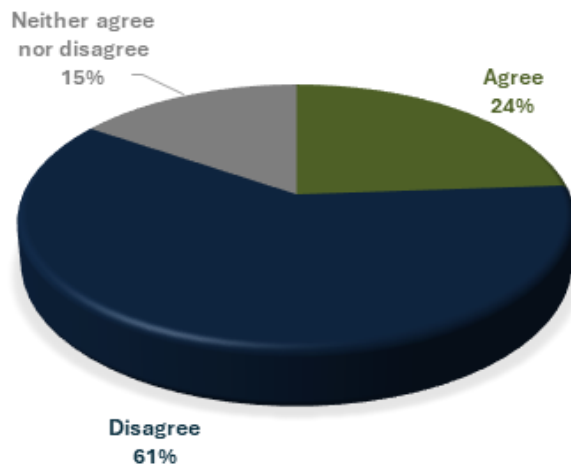
---

## Outcome

**Here's how that outcome was arrived at -**

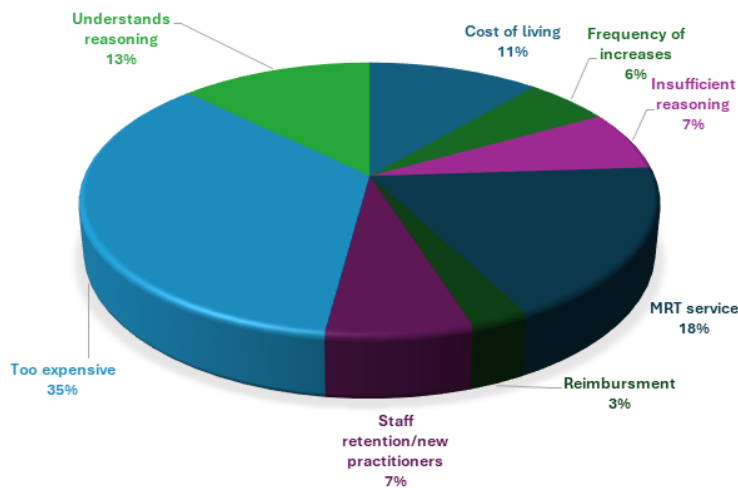
**Proposal 1: Increase in all fees**

Although 61% of respondents did not support the proposal to increase all fees, the main reason noted was due to a perception that the current fees were too expensive. Further information around the ways that fees are set is provided below.



The Board acknowledges that limited financial information was able to be provided, and that practitioners had to rely on historic accounts. This was, and remains, due to circumstances outside of the Board’s control. There were also incorrect comments about frequency of increases and further information is provided below.

Where there was agreement to the proposal this was explained by practitioners, stating that they understood why the increase was necessary or because the cost of the practising certificate was covered by their employer.



There continues to be a lack of understanding of the role of the Board, its functions, and how it is funded. Many practitioners believe that the Board is there only to serve them.

**The purpose of the Board is to protect the health and safety of the Aotearoa New Zealand public** by providing ways for practitioners from the medical imaging and radiation therapy practitioners professions 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.

The Board will look at its communications with the sector and discuss this matter with the professional associations to resolve this confusion.

**Decision:** The Board considered all the information presented to it. As a responsible authority under the Health Practitioners Competence Assurance Act 2003 (HPCA Act) there are functions that it must undertake. As a part of the Secretariat, the Board benefits from a service level agreement - it means that costs for providing regulatory services are split across the authorities. Despite this, when considering the proposed budget, and level of service that needs to be provided to ensure the effective regulation of practitioners, the Board determined that it has no option but to increase its fees as proposed.

Increasing fees will still mean that the Board operates a budget deficit in 2024-2025. Figures presented in October 2023 project a deficit, as explained below.

<b>Medical Radiation Technologist Board</b>	<b>Draft budget 2024-2025</b>
<b>Income</b>	
Practising certificate	\$1,712,655.00
Registration	\$242,490.00
Other	\$86,989.00
Disciplinary levy	\$119,070.00
Total income	\$2,161,204.00
<b>Expenditure</b>	
Board and profession	\$814,707.00
Secretariat services	\$1,655,906.00
Total expenditure	\$2,470,613.00
New surplus/(deficit)	(\$309,409.00)

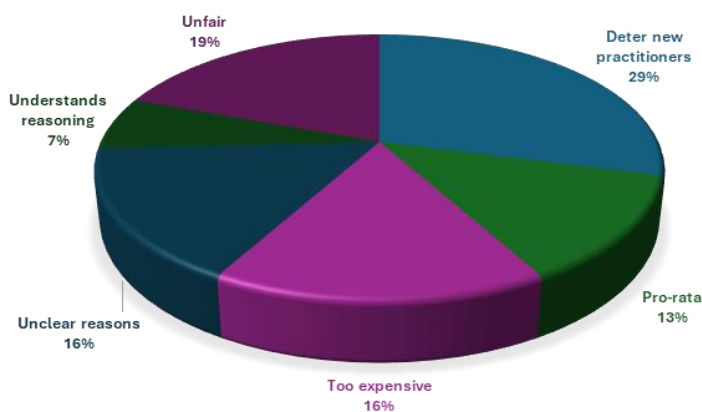
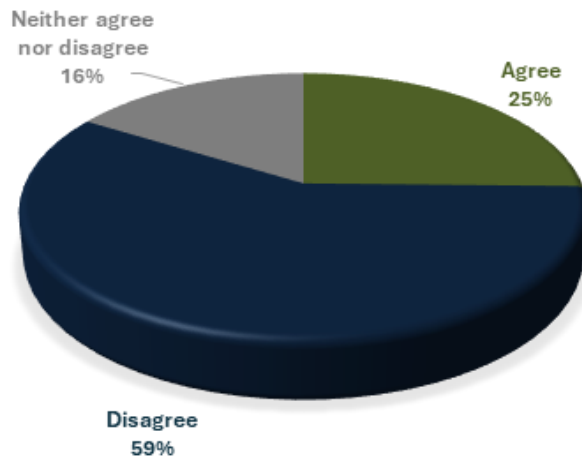
**Proposal 2: Remove reduced and zero fees for practising certificates issued after 30 September each year**

The Board currently offers a reduction in practising certificate fees for practitioners who apply for a first, or return to practice, 'practising certificate' after 30 September each year. The Board also offers a practising certificate for those practitioners applying after 31 January each year that has no associated fee.

The proposal to remove reduced fees was aimed at ensuring all practitioners would pay the same for their practising certificate, regardless of the length of time they hold it.

In this instance 59% of respondents disagreed with the proposal. There was concern that removing the reduced fee would deter practitioners from applying for a certificate, and that it was too expensive for those entering the workforce. Some respondents claimed it was unfair to charge the

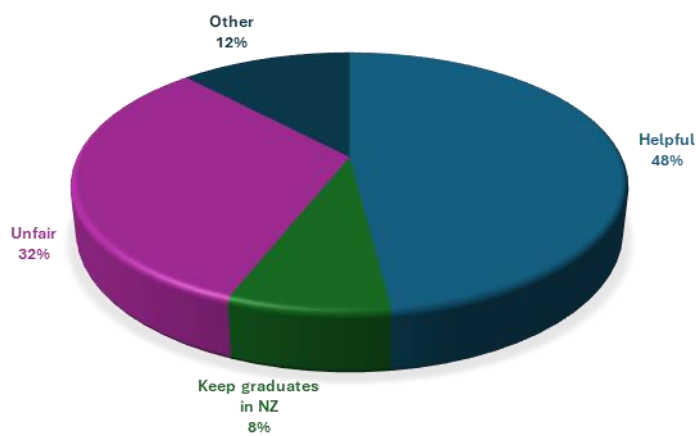
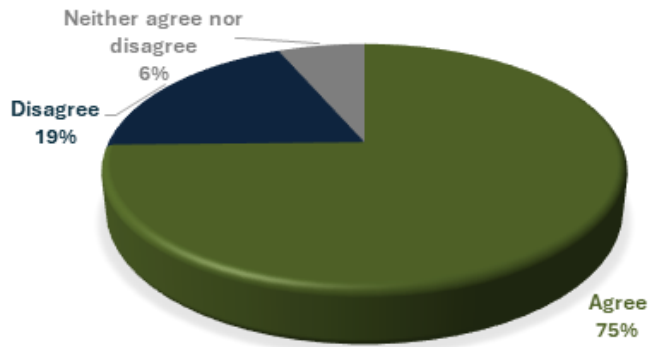
same amount for a practising certificate if it is only held for a short period, and others suggested a proportional fee.



**Proposal 3: Introduce a reduced fee for newly qualified practitioners entering the workforce**

The Board had considered introducing a reduced fee to support newly qualified practitioners entering the workforce. Traditionally the largest group of new graduates enter the workforce in December each year, however, practitioners can enter at other times.

Feedback was largely positive - this was seen as a strategy to support those practitioners entering the workforce who have just completed their education with associated costs. Feedback against this proposal raised matters of fairness - with 32% of respondents claiming it was unfair to those already in the workforce.



Although it is hard to make comparisons with other responsible authorities the Board reviewed fee information to understand how many offer a reduced fee for a partial practice year, or to see if reductions were offered for newly qualified practitioners.

The Board was informed that most responsible authorities do provide a reduced practising certificate fee, although timeframes for reductions vary.

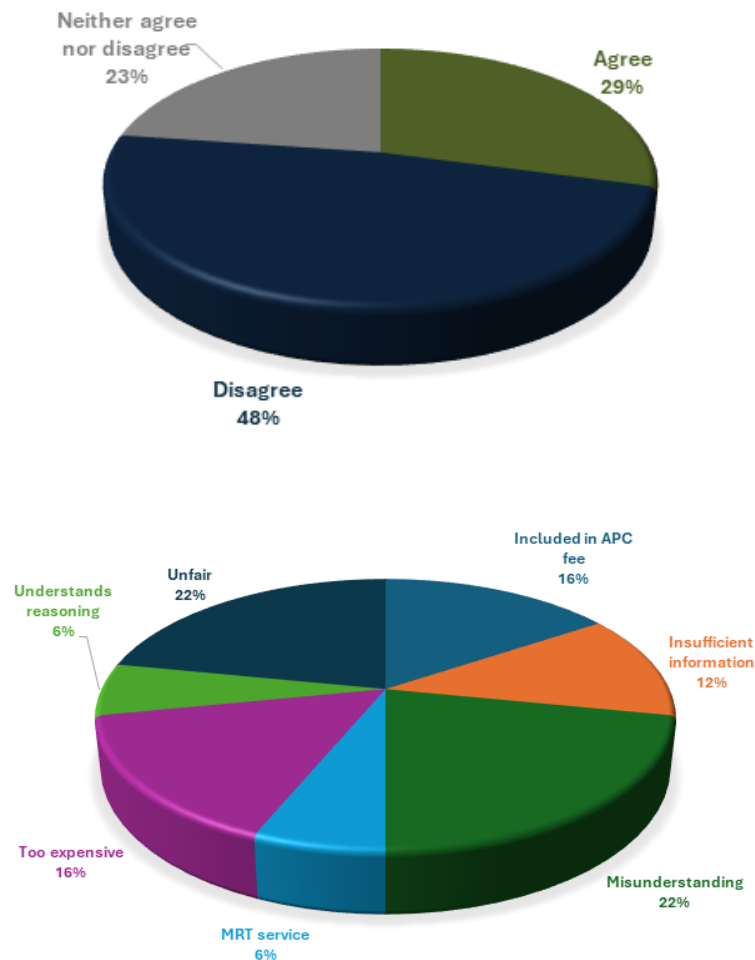
**Decision:** After considering the feedback to proposals two and three the Board made the decision to implement a reduced practising certificate fee for all practitioners who apply for a first or return to practice certificate after 1 December each year. This would capture new graduates and those returning to work for the last third of the practising year. It removed the zero fee for those practitioners who apply after 31 January.

#### **Proposal 4: Introduction of a disciplinary levy**

The Board proposed a separate levy to cover costs for matters of discipline historically covered through the practising certificate fee. While the number of complaints is low, they are hard to predict and allow for.

In this instance 48% of respondents disagreed with the proposal to introduce the levy. Responses to this proposal highlighted a lack of awareness about how matters of discipline are funded, with a number suggesting that the practitioner involved should pay the fees. Overall, 22% of respondents

believed that it was unfair for the whole profession to pay for matters of discipline, reinforcing the notion that practitioners do not understand how these matters are funded.



**Decision:** The Board noted the request for further information about paying this levy, and how frequently it would require the profession to pay. However, as no alternative proposals were presented the Board agreed, in this instance, to gazette\* a fee.

*\* As a statutory body, the Board is required to formally publish notifications of the scopes of practice, accepted qualifications and fees in the New Zealand Gazette.*

### Observations based on feedback received

The Board noted, as with previous consultations, some key themes in the feedback. Information below explains why it could not consider some of the feedback.

**Each authority is responsible for setting the fees for the practitioners they are responsible for regulating.** Those fees are 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.

Fees are set through review of budgets, reserves, ie funds that the Board must hold, and business decisions in consideration of the regulatory environment in which the authority operates. Business decisions include matters such as the review of the scopes of practice. This includes taking into consideration matters of discipline.

**Practitioner fees are reviewed on an annual basis.** Fees were increased in 2019, 2020, 2022 and now 2024.

The **Board publishes a set of audited financial statements each year**, available on the website at **[www.mrtboard.co.nz](http://www.mrtboard.co.nz)**. The **Board also publishes its strategic plan** and other information. This plan sets out the various strategies and initiatives for meeting core regulatory functions funded through the practitioners' fees framework.

Consultation **feedback demonstrated that some respondents continue to perceive the Board as a member organisation. The purpose of the Board is to protect the health and safety of the Aotearoa New Zealand public** by providing ways for 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.

The Board will look at its communications with the sector and discuss this matter with the professional associations to resolve this confusion.