



DIETITIANS BOARD

Te Mana Mātanga Mātai Kai

CONSULTATION

Review of current fees

Released: 10 September 2019

Submissions Due: 5pm 18 October 2019

The purpose of this consultation document is to invite practitioner and stakeholder comment on the Dietitians Board's proposal to gazette changes to Annual Practising Certificate (APC) fees and other fees.

The Dietitians Board has undertaken a robust review of current fees which are calculated on a full cost recovery basis which is the philosophy established by the office of the Auditor-General and the Treasury of good practice guidelines.

The Board anticipates increased expense over the next financial year and beyond, due to an increase in operational costs and a requirement to cover strategic initiatives, costs around policy review and development, a Board Performance Review by an external Ministry of Health appointed reviewer, Health Practitioner Disciplinary Tribunal (HPDT) annual fees, maintenance of appropriate general reserves, and upcoming projects related to the Health Practitioners Competence Assurance Act (2003) Amendment Bill (April 2019).

The proposal to increase fees has not been taken lightly but it is deemed necessary to ensure cost recovery and ongoing viability, and, to ensure the Board is able to meet its obligations to protect the health and safety of the public.

Introduction

1. The Dietitians Board (the Board) is charged under the Health Practitioners Competence Assurance Act 2003 (the HPCA Act) with ensuring that dietitians are competent and fit to practise when they apply for registration and on an ongoing basis. Section 130 of the HPCA Act authorises the Board to prescribe fees in relation to its functions, which are:
 - (a) to prescribe the qualifications required for scopes of practice within the profession, and, for that

purpose, to accredit and monitor educational institutions and degrees, courses of studies, or programmes:

- (b) to authorise the registration of health practitioners under this Act, and to maintain registers:
- (c) to consider applications for annual practising certificates:
- (d) to review and promote the competence of health practitioners:
- (e) to recognise, accredit, and set programmes to ensure the ongoing competence of health practitioners:
- (f) to receive and act on information from health practitioners, employers, and the Health and Disability Commissioner about the competence of health practitioners:
- (g) to notify employers, the Accident Compensation Corporation, the Director-General of Health, and the Health and Disability Commissioner that the practice of a health practitioner may pose a risk of harm to the public:
- (h) to consider the cases of health practitioners who may be unable to perform the functions required for the practice of the profession:
- (i) to set standards of clinical competence, cultural competence (including competencies that will enable effective and respectful interaction with Māori), and ethical conduct to be observed by health practitioners of the profession:
- (j) to liaise with other authorities appointed under this Act about matters of common interest:
- (ja) To promote and facilitate inter-disciplinary collaboration and co-operation in the delivery of health services:
- (k) to promote education and training in the profession:
- (l) to promote public awareness of the responsibilities of the authority:
- (m) to exercise and perform any other functions, powers, and duties that are conferred or imposed on it by or under this Act or any other enactment.

2. Money received from fees is the primary source of income to allow the Board to meet costs associated with its statutory obligations as outlined above. Costs comprise:

- Direct costs which can be allocated to a single fee item. This may include staff, Board time, professional advisors, Expert Advisory Groups, contractors, costs of materials and costs of external services spent specifically on a relevant matter;
- Indirect costs which go towards servicing the profession such as staff general administration time, secretariat administration and operating expenses which cannot be charged to specific fee activities; such as insurance, accounting services, information technology, printing and stationery, postage, Board time spent on governance, Board performance reviews, Health Practitioner Disciplinary Tribunal annual fees, general regulatory work such as policy, competence and fitness to practise matters, projects, liaison with local and overseas professional and regulatory bodies, publications and consultations and general business and operating costs, etc.

3. Each year the Board needs to consider whether the fees it has set remain appropriate and sufficient. The main purpose of the review was to determine whether the Board was sufficiently recovering costs for all services provided and could undertake all the functions required of the Board under the HPCA Act (2003).
4. As part of the review of the fees the Board also reviewed its financial position with regards to maintaining its reserves, and, whether any disciplinary expenditure incurred in the previous 12 months and the current financial year required the Board to introduce a disciplinary levy charged to dietitians for the coming year, and, if any services were being provided to practitioners where costs were not being recovered.
5. In order to determine what changes to the fee schedule might be required, the Board has undertaken a comprehensive exercise to establish the direct and indirect costs to each of the services it provides.
6. Under section 130 of the Health Practitioners Competence Assurance Act 2003 ('HPCA Act') the Board may prescribe fees for the following matters:
 - (a) an application for registration with the authority;
 - (b) an addition or alteration to the register maintained by the authority;
 - (c) the issue of a practising certificate;
 - (d) the issue of any other certificate, or a copy of any certificate;
 - (e) the supply of a copy of any entry in the register;
 - (f) inspection of the register, or of any other documents kept by the authority that are open for inspection;
 - (g) the supply to any health practitioner of any documents, other than certificates of registration, required by him or her for the purpose of seeking registration overseas;
 - (h) examinations set or approved by the authority;
 - (i) any other matter that relates to anything the authority is required to do in order to carry out its functions
7. The changes proposed have been developed with particular reference to the principles outlined in the Office of the Auditor-General's *Guidelines on Charging Fees for Public Sector Goods and Services*. The Board must ensure it takes into account the principles of authority, efficiency and accountability when setting fees, as well as equity issues and likely costs.
8. To follow is a summary of the changes the Board proposes to make which will come into effect on 1 March 2020 and for the 2020-2021 practising year (1 April 2020 to 31 March 2021) and beyond.

Annual Practising Certificate fees for 2020/2021 practising year

9. The Annual Practising Certificate (APC) fee is a part of the mechanism that the HPCA Act provides to ensure public safety – at the time of an APC application and/or renewal, practitioners declare they are competent in their scope of practice, remain fit to practise and meet the recertification requirements.
10. The Board continues to manage funds obtained from APC fees carefully and to monitor financial reserve levels so they are kept at a reasonable level commensurate with its reserves policy, the planned activities of the Board and to smooth fee levels over time. The Board last reviewed and increased APC fees in 2015 to address direct cost recovery of its regulatory functions and costs associated with complying with the

HPCA Act (2003), and the frequent liaison with the Ministry of Health and other health Regulatory Authorities (RAs).

11. APC fees are set according to budgeted net expenditure after taking the Board's income from other activities into account. The APC fees fund the profession's share of net Board expenditure, profession net direct expenditure and any adjustments required to minimum profession operational reserves. Net Board expenditure is allocated on the basis of an analysis of workflow within the Board secretariat.
12. The Board anticipates increased expense over the next financial year and beyond due to an increase in operational costs, maintenance of appropriate general reserves and, subsequent to the HPCA Act Amendment Bill, there is a requirement to cover costs around policy review and development, cultural competence and capability, a Board Performance Review by an external Ministry of Health appointed reviewer, Health Practitioner Disciplinary Tribunal (HPDT) annual fees, strategic initiatives and associated projects.
13. **The Board propose increasing the APC fee from \$575 (incl GST) to \$675 (incl GST) for the 2020/2021 practising year.** This increase will continue to fund the Board's responsibilities under the HPCA Act 2003.
14. The Board will again review its position regarding APC fees ahead of the 2021/22 financial year and will consult with practitioners and stakeholders on any proposals for change.
15. **There will be no disciplinary levy applied to the 2020/2021 practising year.**

Changes to other fees from 1 March 2020

Annual Non Practising declaration fee – Maintenance on Register

16. This fee has been reviewed and to reflect the direct and indirect costs pertaining to maintaining an entry on the Register an increase is required to cover this important regulatory task.
17. **The Board propose to increase the fee for a Non Practising declaration from \$50 (incl GST) to \$90 (incl GST) from 1 March 2020.**

New Zealand Graduate Registration fee

18. This fee has been reviewed and to reflect the direct and indirect costs pertaining to Registration an increase is required to cover this important regulatory task.
19. **The Board propose to increase the fee for Registration for New Zealand Graduates from \$300 (incl GST) to \$350 (incl GST) from 1 March 2020.**

APD's under MRVRC Registration fee

20. The fee for Accredited Practising Dietitians (APD) under the Mutual Recognition Voluntary Recognition Charter (MRVRC) has been reviewed. The current fee reflects the direct and indirect costs pertaining to Registration to cover this important regulatory task and there will be no change to this fee.
21. **The Board advise there will be no change to the fee for Registration for APD's under MRVRC – from 1 March 2020 it will remain at \$350 (incl GST).**

Recognition of Dietetic Qualifications

22. This fee has been reviewed and to reflect the direct and indirect costs pertaining to Registration an increase is required to cover this important regulatory task.
23. **The Board propose to increase the fee for Recognition of Dietetic Qualifications from \$1000 (incl GST) to \$1500 (incl GST) from 1 March 2020.**

Overseas Trained Dietitians Registration Written Examination

24. This fee is paid directly to the Dietitians Association Australia (DAA)

Overseas Trained Dietitians Registration Oral Examination

25. This fee has been reviewed and to reflect the direct and indirect costs pertaining to the oral examination an increase is required to cover this important regulatory task.
26. **The Board propose to increase the fee for Overseas Trained Dietitians Registration Oral Examination - from \$1000 (incl GST) to \$1500 (incl GST) from 1 March 2020.**

Overseas Trained Dietitian Registration fee

27. This fee has been reviewed and to reflect the direct and indirect costs pertaining to Registration an increase is required to cover this important regulatory task
28. **The Board propose to increase the fee for Registration for Overseas Trained Dietitians from \$300 (incl GST) to \$350 (incl GST) from 1 March 2020.**

Restoration of name to register fee

29. The Board have reviewed this fee and found the current fee reflects the amount of Board input and administration work in restoring a practitioner to the Register and there will be no change to this fee.
30. **The Board advise there will be no change to the fee for Restoration of name to the Register - from 1 March 2020 it will remain at \$150 (incl GST)**

Return to Practice fee

31. This fee has been reviewed and to reflect the direct and indirect costs pertaining to Return to Practice an increase is required to cover this important regulatory task.
32. **The Board propose to increase the fee for Return to Practice from \$175 (incl GST) to \$180 (incl GST) from 1 March 2020.**

Copy of Registration Certificate

33. After reviewing the amount of administration time required to process a copy of a Registration Certificate an increase is required to cover direct costs pertaining to the issue of a replacement Certificate of Registration.
34. **The Board propose to increase the fee for a Certificate of Registration from \$65 (incl GST) to \$70 (incl GST) from 1 March 2020.**

Certificate of Good Standing

35. This fee has been reviewed and to reflect the amount of administration work in providing a practitioner with a Certificate of Good Standing an increase is required to cover direct costs.
36. **The Board propose to increase the fee for a Certificate of Good Standing from \$65 (incl GST) to \$70 (incl GST) from 1 March 2020.**

Copy of entry in the Register

37. There is no charge for this as the online register provides access for anyone to ascertain the current status of a New Zealand Registered Dietitian.

Summary

38. The Board has provided details above regarding the proposal to change a number of fees from 1 March 2020 relating to the 2020/2021 practising year and beyond.
39. The Board is mindful of the impact any fee introduction or proposed increase may have on practitioners and makes every effort to balance fulfilling its statutory responsibilities against the fees that it collects.
40. The Board invites practitioners and stakeholders to provide submissions on this proposal.
41. Attached as **Appendix 1** is a complete schedule of all fees proposed.
42. Attached as **Appendix 2** is a fee comparison with other smaller Regulatory Authorities.
43. The Board's Annual Reports and financial statements are available on the Board's website located at www.dietitiansboard.org.nz under 'News and Publications'.

How to have your say

44. Your views on the fee change proposal are welcome. If you wish to make submissions, please provide them in writing by **5pm 18 October 2019**. The Board does not guarantee that submissions received at the Board's offices after this date will be considered.
45. The Board will make a decision at the next Board meeting (6 & 7 November) in time for the new fee structure to be gazetted prior to 31 December 2019.

Submissions can be sent to:

The Registrar
Dietitians Board
PO Box 9644,
Wellington 6141,
NEW ZEALAND

Email: dietitians@dietitiansboard.org.nz

Phone: 04 474 0746

Appendix 1

Fee Schedule for 2020/2021 Practising Year and Beyond

Includes GST

Registration Fees	
New Zealand Graduate Registration	\$350.00
Overseas Trained Dietitian Registration	\$350.00
APD Registration under MRVRC	\$350.00
Return to Practice	\$180.00
Restoration of Name to Register	\$150.00
Overseas Trained Dietitians Assessment & Examination Fees	
Recognition of Dietetic Qualification	\$1500.00
Overseas Trained Dietitians Registration written MCQ ¹ Examination	Paid direct to DAA
Overseas Trained Dietitians Registration oral OSCE ² Examination	\$1500.00
Annual Practising Certificate (APC) Fees	
Issue of Annual Practising Certificate (APC)	\$675.00
Issue of APC paid after 31 March whilst holding APC for previous year	\$875.00
Issue of APC for reduced period – 1 December – 31 March	\$300.00
Annual Non Practising Dietitian - Maintenance of Registration	\$90.00
Other Services	
Copy of Certificate (APC or Registration)	\$70.00
Certificate of Good Standing	\$70.00

¹ Multi Choice Questions

² Objective Simulated Consultation Examination

Appendix 2

Comparison with other Regulatory Authority Fees

The information below is for smaller Regulatory Authorities and is current as at 1 August 2019

Regulator →	Diet	Diet	Chiropractors	Optometrists	Podiatrists	Psychotherapists	Physio	Occupational Therapists	Psych	Osteo
Fee Type↓	Current	Proposed								
NZ Graduate Registration	\$300	\$350		\$265	\$378	\$400	\$230	\$322	\$441.50	\$690
Registration (all)			\$153							
Overseas Trained Registration	\$300	\$350		\$379	\$817	\$400 - \$3300	\$1532.50	\$690	\$764.50	\$1898
APD/MRVRC or TTMR Registration	\$350	\$350		\$265	\$817		\$230	\$322	\$441.50	\$750
APC (new and renewal)	\$575	\$675	\$1279	\$855	\$992	\$850	\$356.50	\$558	\$545	\$1114
			After 3 years expired	Dispensing Opticians						
Additional fee if paid after renewal period (Expired APC) (+APC Fee)	\$184	\$200	\$1518	\$667	\$103	\$200	\$210		\$102	
Non Practising	\$50	\$90	\$150	\$100	\$260	\$70	\$48.30	\$57	\$45	\$172
Process CPD for Non practising										\$172
Non Practising with CPD				\$306						
Return to Practice	\$175	\$180				\$300 - \$1300	\$289.80			
Copy of Registration Certificate	\$65	\$70	\$30	\$30	\$36	\$50	\$57.50	\$23	\$87	
Certificate Good Standing	\$65	\$70	\$50	\$30	\$48	\$50	\$57.50	\$69	\$51	
Restore Name to Register	\$150	\$150		\$100		<2 years \$300	\$198.40			\$750
						>3 years \$1300				

A number of these Boards are currently undertaking Fee Reviews

KEY:

Diet = Dietitians

Physio = Physiotherapists

Psych = Psychologists

Osteo = Osteopaths

September 2019 Dietitians Board Fee Review Consultation