



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

# Consultation

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PRACTITIONER FEES

MEDICAL LABORATORY SCIENCE

OCTOBER 2024

## Executive summary

Te Kaunihera Pūtaiao Hauora O Aotearoa | The Medical Sciences Council (the Council), as a responsible authority under the Health Practitioners Competence Assurance Act (2003), charges fees for services provided to practitioners. The Council also has the ability to impose a levy to pay for disciplinary matters.

In response to increasing costs faced by the Council it is proposing to increase its fees for the 2025/2026 financial year. An approximate 10% increase is proposed for most fees, including those paid for a practising certificate. For medical laboratory science practitioners, the proposal means that the cost of a practising certificate would increase from the current \$294.78 to \$324.26 (GST exclusive). The disciplinary levy of \$50 (GST exclusive) is proposed to remain unchanged.

Practitioners are invited to give feedback about the proposal which the Council will consider before making a decision. Practitioners will be advised of the outcome of this consultation and any changes to fees will be published in the New Zealand Gazette.

## Background

Te Kaunihera Pūtaiao Hauora O Aotearoa | The Medical Sciences Council (the Council), as a responsible authority under the Health Practitioners Competence Assurance Act (2003), sets fees for services provided to practitioners. The Council may also impose a levy to pay for disciplinary matters. The Council 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.

### Functions of the Council

The functions of the Council are described in [section 118 of the Health Practitioners Competence Assurance Act](#). The work undertaken by the Council in enacting these functions is divided into strategic work and its business-as-usual activities.

#### *Business as-usual-activities*

The Council 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. The number of applications for registration has continued to increase and the Council is now managing a larger volume of practitioners. This has meant an increase in the resourcing that is required to manage this in a consistent way.

The Council also manages a number of professional standards cases which were referred to professional conduct committees. It is often hard to predict the number of cases that will be received each year, and the Council must ensure that sufficient funds are allocated for these purposes. The number of cases related to medical laboratory science practitioners has remained stable and for this reason the Council has proposed **no** increase in the disciplinary levy for 2025/2026.

#### *Strategic projects*

Strategic work is underpinned by the [Council's strategic plan](#). The Council has three main strategic 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 2023-2024. The Council continues to work towards improving services to practitioners and increasing the visibility of Council members and activities through attendance at practitioner events such as conferences.

The Council has continued to review its information technology structure to ensure that it meets the needs of a modern and efficient regulator. A long-awaited upgrade in the practitioner interface is planned for mid-2025. The upgrade will support the Council work in streamlining processes, reducing duplicated work and allow upgraded reporting while maintaining and improving security of practitioner information. The Council will use some of the reserves put aside over a number of years to help fund this project.

Underpinning this is the need to ensure the Council's work is enabling effective interaction with Māori. The development of Te Ama Tōtika, the Māori Practitioners Advisory Committee, and a desire to effectively engage with Māori practitioners requires the Council to financially support this rōpū.

The Council also has a need to ensure 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.

### How fees are set

The Council's income is derived from the charging of fees, most of which is associated with the issuing of practising certificates in February – March of each year.

The Council is mindful of balancing the financial pressures experienced by practitioners and the need to continue to deliver and improve services.

The Council has sourced independent advice on how it can continue to remain financially viable into the future. Advice was provided that showed an increase in fees was required to maintain functions and a series of fee increases would be required to ensure the ongoing viability of the Council. The situation has been reviewed following the 2023-2024 year increase and an increase in fees is still required. Copies of the Council's audited financial statements can be found in our [annual reports](#) and on the [Charities Website](#).

The Council has a reserves policy available online which it uses to guide its decision making around the levels of funds that it holds. The holding of reserves relates to ensuring the ongoing financial sustainability of the Council and includes an amount set aside from the disciplinary levy for any cases taken to the Health Practitioner's Disciplinary Tribunal.

### Proposal

The Council is proposing to increase medical laboratory science practitioner fees for the 2025-2026 practising year. The proposed fee increases are necessary for the Council to meet the ongoing costs of delivering its regulatory functions and responsibilities. For most practitioners the main change would be the annual practising certificate (APC) fee.

- a. The proposal means the APC fee would increase from the current \$294.78 to \$324.26 (exclusive of GST).
- b. The proposal means the disciplinary levy would remain at \$50 (exclusive of GST).

A table of proposed fees is included in Appendix A.

## Frequently asked questions

### What do the fees cover?

Fees cover the operational costs of Council functions as well as strategic projects. Fees are designed to be on a cost recovery basis where the cost of providing the service is recovered from those benefitting from the service. The Council provides services both to individuals and to the wider practitioner group.

### What will the increased fees be used for?

The proposed fee increases are necessary for the Council 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 proposed increase will also be used to further the Council's strategic plan which includes upgraded information systems to support efficient functioning and protection of data, working effectively with Māori to reduce health inequities and the review of the scope of practice and competence standards for medical laboratory science practitioners.

### What is a disciplinary levy used for?

This 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 then the profession must pay for this.

Each year the Council must 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.

The Council is proposing the disciplinary levy remain at the same level as 2024/2025 and will review this annually.

### Why don't individual practitioners who are being investigated pay for disciplinary procedures?

If a practitioner is referred to the Tribunal and charges laid are established, then there is a possibility that some costs can be recovered as part of the penalty imposed on the practitioner. However before charges are laid there is a large amount of work that must be completed which starts with an initial investigation to confirm if there is a matter to be addressed. This must all be paid for by the Council.

### What does the Council do to minimise costs?

The Council 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 Treasury. A core strategy that has enabled the Council to keep its fees at a significantly lower level when compared to other similar sized regulatory authorities is its partnership arrangement with the Medical Radiation Technologists Board, whereby secretariat services are shared. This allows the Council to realise benefits such as more efficient staffing resources, the sharing of office accommodation, and a common IT infrastructure.

### Why does the Council have reserve funds?

Having a reasonable level of reserves is essential for the Council's financial viability. As it receives no government funding it is reliant on practitioner fees to fund its operations. Our reserves policy can be found on the consultation webpage.

### Are there any developmental initiatives the Council needs to fund?

The Council has a number of important developmental initiatives that will progress during 2025-2026 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 Council will also continue to improve its engagement with stakeholders.

### Are there any capital projects that the Council needs to fund?

As with any organisation there is a need to consider investment in information technology and information security. The Council has recently commenced an information management project which has looked at the information it holds and the processes around its management. The Council must ensure that it has a robust, efficient information technology system and infrastructure to support its regulatory functions and protect practitioner information.

## Feedback and submissions

The consultation document will be sent to all registered and practising medical laboratory science practitioners. A separate consultation is being undertaken with anaesthetic technicians. It will also be sent to a number of key stakeholder organisations and will be available on the [Council's website](#). The Council invites all practitioners and organisations with an interest in this matter to provide comments and make submissions.

The Council 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.

Please note that as this is a public consultation the Council may publish responses on its website. If you are submitting as an individual, your personal details and any identifiable information will be removed.

Submissions must be received by **11.59pm Monday 2 December 2024**.

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

If you have any questions, please email [mscconsultations@medsci.co.nz](mailto:mscconsultations@medsci.co.nz) with subject line **MSC Fees Consultation**.

Ngā mihi



**Dr Susan Calvert**

**Chief Executive**

## Appendix A

### Schedule of proposed fees

<b>Medical Laboratory Science Practitioners</b>			
<b>Fee type</b>	<b>Current (GST exclusive)</b>	<b>Proposed (GST exclusive)</b>	<b>Proposed (GST inclusive)</b>
<b>Registration Fee</b>			
NZ graduate	398.26	438.09	503.80
Overseas graduate no qualification assessment required	623.47	685.82	788.69
Additional scope	113.04	124.35	143.00
<b>Annual Practising Certificate (APC)</b>			
Renewal of APC received by 31 March	294.78	324.26	372.90
Renewal of APC received after 7 April	413.04	454.34	522.49
Application for an initial or Return to Work practising certificate received between 1 April 202X – 31 March 202Y	294.78	324.26	372.90
Disciplinary levy	50.00	50.00	57.50
Application for a first practising certificate for an Aotearoa New Zealand graduate between 1 December and 31 March each year.	169.56	186.52	214.50
<b>Supply of Documents</b>			
Registration certification/re-issue of registration certificate	66.08	72.69	83.59
Letter of good standing	66.08	72.69	83.59
Restoration to the register	66.08	72.69	83.59
Online Examination	2683.47	2951.82	3394.59