



## DIETITIANS BOARD

Te Mana Mātanga Mātai Kai

28 November 2019

Tēnā koutou

### **Consultation on the proposed APC fees and other fees effective from 1 March 2020**

I write to advise the Dietitians Board has reviewed the detailed responses to our consultation on proposed fees for 2020. We listened to all the feedback and respected those views in our discussions. A list of submitters can be found in Appendix 1.

The Board had to settle on a fee increase that seeks a balance between financial restraint and the reality of meeting legitimate increased costs. From March 2020, the issue of an Annual Practising Certificate will rise from \$575 to \$625 which is an increase of 8.7%. A table outlining the full fee structure is provided in Appendix 2.

The Board accepts that the process of consultation was problematic for a couple of reasons:

1. the absence of financial reports related to the 2019/2020 budget and profit and loss, and
2. insufficient detail regarding potential increases in future operating costs.

Unfortunately, we were required to meet the timing schedule for consultation publishing of notices in the *Gazette*. Due to these time constraints, we had to go to consultation before all the financial projections could be reviewed and analysed.

Subsequently, we had the opportunity to obtain more specific information regarding our future operational and occupancy arrangements, and we revisited our income and expenditure forecasts.

The Board made this decision after carefully considering and discussing the concerns raised in submissions.

There are important factors that impact on our Board's performance, including:

- As one of the smaller Boards, we do not have the economies of scale that Boards with a larger number of practitioners have. This is a matter that we are raising with the Ministry of Health.
- Some costs are outside the control of the Board, particularly those relating to changes coming into effect with the implementation of amendments to the Health Practitioners Competence Assurance Act (HPCAA).
- In an effort to manage costs, the Dietitians Board co-located into a secretariat space with a number of other Regulatory Authorities. There have been benefits to this collaboration; however, we are locked into occupancy arrangements until 2021.

The Board also considered known cost increases, along with anticipated rises in costs associated with recent changes to the HPCAA and Wellington office rental market. Items that will impact costs include:

- alignment of Board activities to ensure compliance with changes to the HPCAA -  
example of new HPCAA costs: from 2020 Regulatory Authorities are required to fund the Health Practitioners Disciplinary Tribunal's general administration costs;
- future increases in rent due to the continued shortage of suitable Wellington office space and significant increases in building insurance (earthquake) costs;

- proposed cost increases to the Service Level Agreement with the Nursing Council which is unable to be renegotiated at this time;
- increasing volume and complexity of conduct, fitness to practise, competency and disciplinary cases. Whilst some costs can be recovered through the disciplinary reserves, most matters are managed through the operating budget or general reserves.

As a Board we have tried to ensure that we apply a “Right Touch” to our regulatory work. This means that we meet our legal requirements to ensure that the health and safety of the public is protected, without excessive regulation. In carrying out our duties, we have completed several important projects since 2016 including:

- review of the *Scope of Practice: Dietitian*,
- review and development of *Professional Standards & Competencies for Dietitians*,
- development of *Accreditation Standards for New Zealand Dietetic Education Programmes*, including guidelines and processes, and recent accreditation reviews of three programmes,
- development of examinations for overseas trained dietitians and those returning to work after a significant period of time away from the workforce, and
- update of our IT systems aimed at improving our processes and reducing compliance requirements, where possible, for practitioners over the longer term.

The Board is committed to ensuring that our regulatory system is efficient and delivers the best possible outcomes to the public and practitioners. We are doing everything we can to minimise compliance costs and to ensure the outcomes we produce meet the high standards of the public and practitioners.

The fee increase for 2020 was not an easy decision for the Board, but it was deemed necessary to ensure cost recovery and ongoing viability, so the Board can continue to meet its obligations to protect the health and safety of the public.

Nāku noa, nā



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## Appendix 1: Breakdown of submissions

*The consultation was sent to ~1200 individuals & organisations, 940 of those were on the Board's Register.*

Total number of submissions	50
Number of individual practitioner submissions	Practising = 41 Non-Practising = 1
<i>Breakdown of individual practitioners</i>	<i>DHB = 24</i> <i>NGO = 6</i> <i>Private Practice = 4</i> <i>Education Provider/Academic = 3</i> <i>PHO = 2</i> <i>Private Hospital = 2</i>
Number of dietetic group submissions	6 <ul style="list-style-type: none"> <li>• The University of Auckland*</li> <li>• Dietitians NZ (<i>on behalf of the Council*</i>)</li> <li>• Counties Manakau Health Dietitian team (<i>~42 dietitians</i>)</li> <li>• Waikato District Health Board Dietitians (<i>employs ~35 dietitians</i>)</li> <li>• DHB Dietitian Leaders Group (<i>on behalf of 20 individuals</i>)</li> <li>• Capital Coast DHB Dietitians (<i>14 dietitians listed</i>)</li> </ul> <p><i>*No indication how many dietitians represented in submission</i></p>
Number of other group submissions	2 <ul style="list-style-type: none"> <li>• National Directors of Allied Health, Scientific &amp; Technical</li> <li>• NZ Hospital Pharmacists' Association (<i>declined making a submission</i>)</li> </ul>

## Appendix 2: Dietitians Board Fees from 1 March 2020

<b>Registration Fees</b>	<b>Current</b>	<b>From 1 March 2020</b>
New Zealand Graduate Registration	\$300.00	\$300.00
Overseas Trained Dietitian Registration	\$300.00	\$300.00
Australian APD Registration under MRVRC	\$350.00	\$350.00
Return to Practice	\$175.00	\$175.00
Restoration of Name to Register	\$150.00	\$150.00
<b>Overseas Trained Dietitians Assessment &amp; Examination Fees</b>		
Recognition of Dietetic Qualification	\$1000.00	\$1500.00
Overseas Trained Dietitians Registration Written Examination	Direct to DAA	Direct to DAA
Overseas Trained Dietitians Registration Oral Examination	\$1000.00	\$1500.00
<b>Annual Practising Certificate (APC) Fees</b>		
Issue of Annual Practising Certificate (APC)	\$575.00	\$625.00
Issue of APC paid after 31 March whilst holding APC for previous year	\$759.00	\$825.00
Issue of APC for reduced period – 1 December – 31 March	\$307.00	\$300.00
Annual Non Practising Dietitian - Maintenance of Registration	\$50.00	\$90.00
<b>Other Services</b>		
Copy of Certificate (APC or Registration)	\$65.00	\$70.00
Certificate of Good Standing	\$65.00	\$70.00