

Proposal:

Annual Practising Certificate Fees for the year to 31 March 2024

(typically invoiced in March 2023)

3 November 2022

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1. Executive Summary

The Board invites **feedback** and submissions on these proposals by email or post by **14 December 2022**. After the consultation period has closed, the Board will consider submissions received before making a decision. The final decision will be made by the Board before the end year, prior to placing a notice of the fee and levy in the NZ gazette for when the applications for the renewal of the APC opens for the 2023/2024 practising year.

The current proposed increases are that the APC fee increases from \$769.00 to \$919.00 (inclusive of GST) for optometrists, and \$747.00 to \$897.00 for dispensing opticians. The APC fees includes a disciplinary levy portion help fund its conduct and fitness to practice activities of the Board and remains unchanged from 2019.

In 2022, the Board also made a minor change to its fees schedule, to include a fee for a “change in scope”. To include this into its updated fees schedule, as well as to update and clean up its historical fee items, the Board proposes a few changes to update its 2023 Fees schedule.

Copies of this consultation document have been sent to practitioners registered with the Board, the Office of the Chief Allied Health Professions Officer, the Ministry of Health, Te Whatu Ora Health NZ, and other key stakeholders.

2. Introduction

The Optometrists and Dispensing Opticians Board (ODOB, the Board) of Aotearoa New Zealand (NZ) is the regulatory authority responsible for the registration of optometrists and dispensing opticians.

Our primary function is to protect the health and safety of the public by providing mechanisms to ensure that optometrists and dispensing opticians are competent and fit to practise.

The Board has not increased its registration fees since 2013 (see **Table 1**). The annual practising certificate (APC), disciplinary levy and specific activity fees fund the Board to enable it to carry out its functions. The Board’s primary source of income is from the APC fee.

The purpose of this consultation paper is to seek feedback from stakeholders about a proposed increase to the APC fee, as well as to update its current fees schedule (i.e., its gazetted fees schedules, **Appendix 2 and 3**).

3. Background

APC fees are set by the Board. The Board is committed to ensuring that it operates in a cost-effective manner and strives to maintain a balance between ensuring the efficient and effective discharge of its public safety obligations and practitioner affordability.

The Board’s APC total fees has decreased significantly in 2014 for dispensing opticians and 2015 for optometrists. These decreases were at an all-time low with almost a 26 per cent (%) drop from 2013 for optometrists (in 2015), and a 14% drop for dispensing opticians (in 2014). The APC fees for dispensing opticians have not changed since 2017, with minimal change to the APC fees for optometrists since 2016 (see **Table 1** for more information).

The past few years the Board has carried all expenses, including during the COVID-19 pandemic, but is now no longer able to do so.

Table 1: The Board's registration and APC fees from 2013 to 2022

YEAR*	REGISTRATION FEE	FULL APC	DISCOUNTED APC FEE
2013	New graduates: \$265.00 All scopes, incl. the registration of Australian graduates via the Trans-Tasman Mutual Recognition Act of 1997 (TTMR) pathway: \$379	Optometrists: \$1012.00 (incl. disciplinary levy of \$157.00) Dispensing opticians: \$774.00 (incl. disciplinary levy of \$107.00)	Optometrists: \$632.00 (incl. disciplinary levy of \$103.00) Dispensing opticians: \$525.00 (incl. disciplinary levy of \$70.00)
2014	New graduates: \$265.00 All scopes, incl. registration via the TTMR pathway: \$379.00	Optometrists: \$1012.00 (incl. disciplinary levy of \$157.00) Dispensing opticians: \$667.00 (No discipline levy)	Optometrists: \$632.00 (incl. disciplinary levy of \$103.00) Dispensing opticians: \$455.00 (No discipline levy)
2015	New graduates: \$265.00 All scopes, incl. registration via the TTMR pathway: \$379	Optometrists: \$855.00 (No discipline levy) Dispensing opticians: \$667.00 (No discipline levy)	Optometrists: \$570.00 (No discipline levy) Dispensing opticians: \$445.00 (No discipline levy)
2016	New graduates: \$265.00 All scopes, incl. registration via the TTMR pathway: \$379	Optometrists: \$754.00 (No discipline levy) Dispensing opticians: \$711.00 (No discipline levy)	Optometrists: \$503.00 (No discipline levy) Dispensing opticians: \$474.00 (No discipline levy)
2017	New graduates: \$265.00 All scopes, incl. registration via the TTMR pathway: \$379	Optometrists: \$754.00 (No discipline levy) Dispensing opticians: \$747.00 (incl. disciplinary levy of \$37.00)	Optometrists: \$503.00 (No discipline levy) Dispensing opticians: \$499.00 (incl. disciplinary levy of \$25.00)
2018	New graduates: \$265.00 All scopes, incl. registration via the TTMR pathway: \$379	Optometrists: \$754.00 (No discipline levy) Dispensing opticians: \$747.00 (incl. disciplinary levy of \$37.00)	Optometrists: \$503.00 (No discipline levy) Dispensing opticians: \$499.00 (incl. disciplinary levy of \$25.00)
2019	New graduates: \$265.00 All scopes, incl. registration via the TTMR pathway: \$379	Optometrists: \$813.50 (incl. disciplinary levy of \$64.50) Dispensing opticians: \$747.00 (incl. disciplinary levy of \$37.00)	Optometrists: \$542.00 (incl. disciplinary levy of \$43.00) Dispensing opticians: \$499.00 (incl. disciplinary levy of \$25.00)
2020	New graduates: \$265.00 All scopes, incl. registration via the TTMR pathway: \$379	Optometrists: \$769.00 (incl. disciplinary levy of \$20.00) Dispensing opticians: \$747.00 (incl. disciplinary levy of \$37.00)	Optometrists: \$513.00 (incl. disciplinary levy of \$13.00) Dispensing opticians: \$499.00 (incl. disciplinary levy of \$25.00)
2021	No change from previous year		

* For clarity, the years in this table and document refer to the year the bulk of the APCs are invoiced (i.e., March each year)

The registration and application for practising certificates for health practitioners are mandatory as set out by the Health Practitioners Competence Assurance Act 2003 (HPCA Act). However, the benefit to optometrists and dispensing opticians from being registered includes:

- The Board operates a thorough APC process that gives the public and the wider health sector confidence that optometrists and dispensing opticians in NZ meet high professional standards and meet the requirements to practise and deliver care in our communities.

- The Board sets standards for education and training programmes and accreditation of the providers. This includes the processes for approval, accreditation, and monitoring which means that NZ graduates are competent on completion of their qualification to practise.
- Administrative support through the regulatory framework which supports optometrists and dispensing opticians practising in NZ. This means the Board can swiftly move to address challenges in the workforce (e.g., granting emergency practising certificates as part of the pandemic response).
- The Board’s registration policies and processes for overseas registrants, through its Provisional optometrist scope of practice, ensures that practitioners are competent and fit to practice within a NZ context.
- The Board is resourced to pay for the cost of running a hearing if a practitioner is referred to the Health Practitioners Disciplinary Tribunal as a result of charges laid against them by a Professional Conduct Committee or the Director of Proceedings.
- The Board is able to work collaboratively with the Ministry of Health and other government agencies to support and address both short and long-term health and workforce issues confronting the profession.
- Upgraded IT systems will make it easier and more efficient for practitioners, employers, and members of the public to access all regulatory information relating to their registration practice, and to administer their recertification requirements through the practitioner portal (MyODOB).
- The Board is implementing Te Tiriti o Waitangi principles throughout its work, with the aim to have this reflected in the Board’s policies and processes over time.

4. Review of costs

The Board’s last increased the APC fee from \$754.00 to \$813.50 for optometrists in 2019 before decreasing it again to \$769.00 in 2020 and remained unchanged since. The APC for dispensing opticians was last increased from \$711.00 to \$747.00 in 2017 and remained unchanged since. In August 2022, the Board appointed Grant Thornton (accountants) to

- Provide advice around the current financial forecasting practices
- Assist in the preparation of projected cash needs for the year to 31 March 23 and the following two years including reserve levels (including assumptions)
- Prepare a full costing model to help the Board understand what the various functions would cost in a “standard” year – to help make decisions about fee levels including avoiding cross-subsidisation
- Provide other related advice and quality assurance.

The main conclusion from the multi-year forecasts was that the current levels of fees from the expected registrant numbers would not be sufficient to fund the operations of the Board over the next three years.

Grant Thornton’s advice was that there is a strong likelihood that the fee increases (to APC) being consulted on in this document would not be sufficient to meet the future cash needs of the Board and a similar exercise would need to be undertaken in the 2023 Calendar year.

The full costing model work has been deferred to the 2023 calendar year.

Factors that have combined to cause the forecast deficits include:

- APC fees have not increased since 2019 for optometrists and 2017 for dispensing opticians.
- Increased regulation requirements on the Board, including the health system reform, that requires more resources.
- Upgraded IT system requirements is needed to support its regulatory functions.
- Increased related to indexation over the past five years of which the Board has absorbed. Cost of living and inflation has increased over the past 12 months. In the September 2022 quarter compared with the September 2021 quarter, the consumer price index (CPI) inflation rate was 7.2 per cent¹. This reflects the costs the Board faces in response to inflation from all sources.
- From June 2020, the Board is required to fund the administrative costs of the Health Practitioners Disciplinary Tribunal.
- Increased number of strategic projects to achieve the Board’s objectives as set out in its draft strategic plan for 2023 to 2025.
- The fees related to the service level agreement (SLA) with the Nursing Council of New Zealand (NCNZ) have increased. This includes rent, facilities management and financial management services.
- The Optometry Council of Australia and New Zealand (OCANZ) has increased its fees. OCANZ is contracted to support the Board in the accreditation of optometry schools in Australia and NZ; as well as the assessment of international optometrists, and optometrists completing their therapeutics courses.

5. Proposal to increase APC fees

The Board is taking a cautious approach to any APC fee increase and considers the impact this will have on practitioners. Given the current forecasted deficits for the 2023 year onward, it is proposed that the Board increases the APC fees by \$150.

This proposed increase will ensure that our service cost model is effective for our long-term financial resilience.

The proposed APC fees structure is in **Table 2** below.

Table 2: The current and proposed APC fees

Fee	Current fee (including disciplinary levy)	Proposed fee (including disciplinary levy) for 2023	Change
APC fee for optometrist	\$769.00 (including a disciplinary levy of \$20.00)	\$919.00 (including a disciplinary levy of \$20.00)	+ \$150.00
Discounted APC fee (if applying for an APC after 30 September)	\$513.00 (including a disciplinary levy of \$13.00)	\$663.00 (including a disciplinary levy of \$13.00)	+ \$150.00
APC fee for dispensing opticians	\$747.00 (including a disciplinary levy of \$37.00)	\$897.00 (including a disciplinary levy of \$37.00)	+ \$150.00
Discounted APC fee (if applying for an APC after 30 September)	\$499.00 (including a disciplinary levy of \$25.00)	\$649.00 (including a disciplinary levy of \$25.00)	+ \$150.00

¹[https://www.stats.govt.nz/information-releases/consumers-price-index-september-2022-quarter/#:~:text=Annual%20change,housing%20\(up%204.6%20percent\).](https://www.stats.govt.nz/information-releases/consumers-price-index-september-2022-quarter/#:~:text=Annual%20change,housing%20(up%204.6%20percent).)

6. Proposed updated fees schedule

In 2022, the Board made a minor change to its fees schedule, to include a fee for a “change in scope”². To include this into its updated fees schedule, as well as to update and clean up its historical fee items, the Board made the following changes:

- Removed four fee items that have not been used the past 10 years. The last two, i.e., historically, services around the assessment and accreditation of accreditation of continuing professional development (CPD) activities has been included in the Board’s services to practitioners paying their APC fees, and the hourly rate there no longer applies (see **Table 3** below).

Table 3: Items to be removed from the 2023 Fees schedule

Current scheduled fee item	Current fee
Application for an annual or interim practising certificate – for practitioners on the Registers of Optometrists or Dispensing Opticians holding a practising certificate in the year 1 April to 31 March who apply for a certificate for the following year after the expiration of their current practising certificate (after 31 March) and who are still practising after 31 March (in addition to APC fee)	\$240.00
Letter confirming authority to practise	\$30.00
Hourly fee for application for assessment of accreditation of online CPD activity	\$75.00
Hourly fee for application for assessment of accreditation of CPD where the activity is not open to all registrants	\$75.00

- Removal of any references to “interim practising certificates”, as the Board do not issue those for the past five years. The Board only has two APC fees – a full fee and a discounted fee (for applicants applying after 30 September each year).
- Re-ordering of items in the fees schedules, for example to list registration fees first and add headings. Several items in the fees schedule were re-written in plain language. E.g., the “Application for assessment of an individual CPD dossier by the CPD accreditation committee”, has been changed to “Assessment of documents / portfolio (*The assessment of a portfolio of evidence of a practitioner either seeking recognition of prior learning (RPL), or credit accumulation and transfer for formal recognition for any part of the recertification programme with the Board.*)” (see **Table 4** below).
- Two registration fee items were split into a few items under various headings to follow a consistent format throughout the fees schedule and re-written in plain language to make it clearer. This split has also been consistently used in our registration forms the past five years. The Board’s registration fees remained unchanged since 2013³ (see **Tables 1 and 4**).
- One fee item, the “Supervision session required by the Board”, has been split in two and included an additional description to recover costs incurred by the Board (see **Table 4** below).

² <https://www.odob.health.nz/wp-content/uploads/2022/08/Fees-amendment-add-scope-2022-gs1809-1.pdf>

³ <https://www.odob.health.nz/i-want-to-register/register-as-an-optometrist/>

Table 4: Fee items re-written into plain language to make it clearer

Current scheduled fee item	Current fee	Proposed scheduled fee item	Proposed fee for 2023
Application for registration from an applicant who holds a prescribed qualification, including Trans-Tasman Mutual Recognition (TTMR) applications and qualifications that have been accepted by the board under section 15(2) of the Health Practitioners Competence Assurance Act 2003	\$379.00	Application for registration from Australian registered optometrists ⁴ pursuant to the Trans-Tasman Mutual Recognition Act of 1997 (TTMRA), and qualifications that have been accepted by the Board under section 15(2) of the Health Practitioners Competence Assurance Act of 2003 (HPCA Act).	\$379.00
		Applications for New Zealand or Australian trained graduates ⁵ registering for the first time, more than 12 months after graduating.	\$379.00
		Applications for the registration in the provisional optometrist scope of practice ⁶ . For graduates from a New Zealand or Australian training institution, and who will register for the first time, more than 12 months after graduating.	\$379.00
Application for registration – where the practitioner is a New Zealand or Australia-trained graduate registering in their first year of practice since graduating	\$265.00	Applications for New Zealand or Australian trained graduates ⁷ , registering for the first time within 12 months after graduating, and who have never registered in any other country or jurisdiction.	\$265.00
	\$265.00	Applications for the registration in the provisional optometrist scope of practice ⁸ (For new graduates from an accredited and recognised New Zealand or Australian education and training provider, who applies for registration with the Board, within 12 months after graduating)	\$265.00
Application for assessment of an individual CPD dossier by the CPD accreditation committee	\$204.00	Assessment of documents / portfolio (<i>The assessment of a portfolio of evidence of a practitioner seeking recognition of prior learning (RPL), or credit accumulation and transfer for formal recognition for any part of the recertification programme with the Board.</i>)	\$204.00
Supervision session required by the Board	\$115.00	Registration related supervision or mentoring session required by the Board (hourly fee). <i>A session is usually between 1 to 3 hours long. If a supervision report is required, an additional hour will be charged.</i>	\$115.00
		Competence or conduct related supervision or mentoring session required by the Board (hourly rate). <i>A session is usually between 1 to 3 hours long. If a supervision report is required, an additional hour will be charged.</i>	\$115.00

Please see the proposed schedule of fees for 2023 (draft Gazette notice) in **Appendix 1**.

7. How to make a submission

If you wish to make a submission, please provide this in writing by **5.00 pm on 14 December 2022**. The Board does not guarantee that submissions received at the Board’s offices after that date will be considered.

⁴ Under the heading: “Australian registered optometrists, applying to register with Board.”

⁵ Under the heading: “Optometrists or Dispensing opticians’ graduates registering with the Board for the first time.”

⁶ Under the heading: “Applicants registering in the Provisional optometrist scope of practice.”

⁷ Under the heading: “Optometrists or Dispensing opticians’ graduates registering with the Board for the first time.”

⁸ Under the heading: “Applicants registering in the Provisional optometrist scope of practice.”

Submissions can be emailed to registrar@odob.health.nz or submitted via post at:

The Registrar
Optometrists and Dispensing Opticians Board
PO Box 9644
Wellington 6141

8. APPENDICES

The list of appendices below:

Appendix 1	The proposed Gazetted fees schedule for 2023: Draft Gazette notice for Fees Payable to the Optometrists and Dispensing Opticians Board from 1 April 2023
Appendix 2	<i>Optometrists and Dispensing Opticians (Fees) Notice 2020 (New Zealand Gazette, 29 January 2020, Gazette Number 2020-gs377)</i>
Appendix 3	<i>Optometrists and Dispensing Opticians (Fees Amendment) Notice 2022 (New Zealand Gazette, Notice Number 2022-gs1809)</i>