

16 January 2020

Krystiarna Jarnet
Senior Education Adviser
Medical Council of New Zealand

By email: education@mcnz.org.nz

Proposed fees for the accreditation of New Zealand-based vocational training and recertification providers

Dear Krystiarna

Thank you for inviting the New Zealand Medical Association (NZMA) to provide feedback on the above consultation. The NZMA is New Zealand's largest medical organisation, with more than 5,000 members from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and to promote professional unity and values, and the health of all New Zealanders.

We note that Council proposes to introduce a fee of \$30,736.41 for the accreditation of vocational medical training and recertification programmes for New Zealand colleges and \$20,470.45 for recertification providers only. We understand the purpose of the proposal is to recover the costs from accreditation visits and reduce cross subsidisation, in line with Activity-Based Costing for fees, to better ensure that Council's fee structure is fair and equitable.

While we are supportive, in principle, of Activity-Based Costing for fees, we have concerns about the impacts of the proposed fees on small membership colleges such as the New Zealand College of Public Health Medicine. Before finalising these proposed fees, we would like Council to acknowledge and respond to these concerns. It would also be helpful if Council is able to provide greater transparency on how these fees have been calculated. Specifically, we would welcome a breakdown, if possible, for each of the three components of the calculated fee that Council has identified: a) direct labour – how many hours? b) direct costs – what are Council's daily rates, travel and accommodation costs? c) indirect costs – what is the percentage applied to the direct labour costs?

Yours sincerely



Dr Kate Baddock
NZMA Chair