



CONSULTATION ON ESTABLISHING APPLICATION FEES FOR THE NEUROPSYCHOLOGIST SCOPE OF PRACTICE

NOVEMBER 30, 2017 - JANUARY 8, 2018

Purpose of this consultation:

To invite stakeholder comment on the proposed application fees for the Neuropsychologist scope of practice.

Background:

1. The Psychologists Board (the **Board**) is the regulatory authority charged under the Health Practitioners Competence Assurance Act 2003 (the **Act**) with ensuring that Psychologists are competent and fit to practise when they apply for registration and on an ongoing basis. By law, a regulatory authority must generate sufficient revenue to cover its operating costs. To accomplish this, it is empowered by the Act to prescribe fees (refer s130 of the Act) and to impose a disciplinary levy (under s131 of the Act). The Board receives no funding from the government. Section 118 of the Act authorises the Board to prescribe fees in relation to a list of prescribed functions.
2. The fees and levy charged by the Board must be developed in accordance with the principles and guidelines published by the Office of the Auditor-General (**OAG**) (*Guidelines on Charging Fees for Public Sector Goods and Services*), Parliament's Regulations Review Committee (**RRC**), and the New Zealand Treasury (*Good Practice Guideline for Setting Charges in the Public Sector*). The Board must ensure it takes into account (for example) the principles of efficiency, accountability, cost-recovery, and consultation.
3. The funds received from fees and the disciplinary levy allow the Board to meet the costs associated with its statutory obligations as outlined above. These costs comprise:
 - **Direct costs**, which can be attributed to a specific fee or levy. This could include, for example, staff or committee time, costs of materials, and/or costs of services purchased (e.g., courier charges);

- **Indirect costs**, which cannot be attributed to a specific fee or levy. This could include, for example, Board governance activity, projects, external liaison and consultation, insurance, accounting services, or office supplies.
4. Following extensive consultation, the Board resolved to establish a “Neuropsychologist” scope of practice, and now must set the fees for practitioners applying for registration in this scope.
 5. In order to determine what these fees should be, the Board has (in accordance with the OAG’s guidelines) undertaken a comprehensive analysis to establish the direct and indirect costs of processing such applications.
 6. Section 130 of the Act authorises the Board to prescribe fees for applications for registration.
 7. The new fees the Board proposes to establish (with effect from 19 February 2018) are set out below. The Board’s preference is that the fees be adopted as set out, in order to ensure cost recovery and to prevent any cross-subsidisation by other practitioners. We will, however, keep an open mind and no decisions will be made until the feedback we receive in response to this consultation has been carefully considered.

Application Pathway:

8. As noted in our earlier consultation documents, the Board is obligated to provide a “grand-parenting” pathway to registration for practitioners who have previously been competently and safely practising in the area described by the scope of practice. Such a pathway has routinely been implemented by the Board for other newly established scopes of practice. In the case of the Neuropsychologist scope of practice, the grand-parenting pathway has also been designed to provide an interim mechanism for addressing the current lack of an accredited training programme in New Zealand.
9. The grand-parenting criteria are similar to those used by the Board for other scopes of practice. Specifically, applicants must:
 - Already be registered in or eligible for the Psychologist scope of practice.
 - Have practised safely¹ within the field of neuropsychology for 4,000 hours over the last six years.²
 - Have had regular professional supervision appropriate for his or her work in this area.

¹ The applicant must not have a history of complaints, competence, or fitness notifications that reflect adversely on their ability to practise safely in the scope of practice.

² The key issue here is supporting evidence that the practitioner has developed and maintained the prescribed core competencies, with neuropsychology representing a significant portion of his or her practice. A reasonably flexible approach will be taken, with the 4,000 hour benchmark as a guide. (4,000 hours roughly equates to 2 years of full-time practice.)

- Currently be considered fit to practise (in accordance with section 16 of the Act).
- Have no competence notifications or processes currently underway.

10. Given the specialist knowledge required to assess the equivalency of many aspects of neuropsychology training and competence, a group of Expert Assessors³ will be established to advise the Board on complex applications. When required, these assessors will assess a practitioner's competence by considering:

- academic qualifications completed,
- practical training undertaken,
- a Curriculum Vitae and detailed description of relevant professional work,
- up to five case reports,
- evidence of relevant continued competence activity within the past two years, and
- reference(s) from appropriate supervisor(s).

Where a decision cannot be made based on the above information, an interview may also be required.

Assessment Process:

N.B.: *All applications based purely on academic qualifications will be considered in the first instance (Stage 1) by the Registrar or Deputy Registrar, who may seek advice from other staff members or from any of the appointed Expert Assessors (see below). It is anticipated that the majority of applications will be determined at Stage 1. Stages 2 & 3 only apply to applications made under the grand-parenting pathway, and only where a determination cannot be made at Stage 1.*

Stage 1: Applications will be reviewed (with reference to the prescribed qualifications and core competencies) by the Board's Psychology Advisor, who will provide a summary and recommendation(s) to the Registrar or Deputy Registrar. The advice will include an opinion as to whether or not the application is straight-forward enough to be considered and determined without the need for external expert advice. The (Deputy) Registrar may also seek advice from one of the appointed Expert Assessors. The (Deputy) Registrar will then consider the application and will either communicate a (proposed or final) decision or will inform the applicant that their application needs to be subject to a Stage 2 assessment.

Stage 2 (if required): Applications requiring additional expert assessment will be sent to two of the Board's appointed Expert Assessors⁴ for independent review. The Expert Assessors may request the submission of two reports that the applicant considers to showcase their expertise. The Assessors may ask the applicant to provide further information if required, including up to three additional reports. Each Assessor will provide the (Deputy) Registrar with his or her opinion as to

³ The Assessors will be acknowledged experts in the field drawn from within New Zealand and (possibly) Australian academic and professional association circles. Any practitioners interested in being appointed as an Expert Assessor should contact steve.osborne@nzpb.org.nz.

⁴ A panel of at least six Expert Assessors will be appointed by the Registrar, based on nominations from the profession as a whole. This should ensure that any potential bias or conflict of interest can be appropriately managed.

whether the scope should be granted (with or without conditions⁵), and will provide clear reasons for his or her opinion. If the Assessors do not concur, a third Assessor may be consulted. The (Deputy) Registrar will ultimately consider the application and will issue a proposed or final decision (which may include referral for a Stage 3 assessment).

Stage 3 (if required): An interview of the applicant will be conducted by two Expert Assessors. Interviews will focus on the possible gaps/shortcomings identified in the Stage 2 assessment.

Outcomes: Where a decision or proposed decision is to decline an application or to include conditions, clear reasons will be given, including feedback on what competencies were assessed as being absent or underdeveloped.

Proposed new fees:

In order to ensure cost recovery only, and to guard against cross-subsidisation, it is proposed that each stage of the assessment process outlined above will attract a separate fee.

Application for the Neuropsychologist scope of practice (Stage 1)

11. The total costs for processing an application at Stage 1 have been estimated at \$564.58 (excl GST). This includes the assignment of indirect costs (see above).

12. The Board therefore proposes to establish a new fee of \$650.00 (incl. GST) for Stage 1 applications.

Application for the Neuropsychologist scope of practice (Stage 2)

13. The total costs for processing an application at Stage 2 have been estimated at \$601.18 (excl GST). This includes direct costs only, as indirect costs will have already been recovered at Stage 1.

14. The Board therefore proposes to establish a new fee of \$690.00 (incl. GST) for Stage 2 applications.

Application for the Neuropsychologist scope of practice (Stage 3)

15. The total costs for processing an application at Stage 1 have been estimated at \$593.42 (excl GST). This includes direct costs only, as indirect costs will have already been recovered at Stage 1.

16. The Board therefore proposes to establish a new fee of \$682.00 (incl. GST) for Stage 3 registration applications.

⁵ Conditions may, for example, include a requirement for supervised practice or the completion of further (specified) training/education within a set time period.

Summary:

17. The Board has provided details above regarding proposals to establish application fees for the Neuropsychologist scope of practice and invites all stakeholders to provide submissions on the proposals.
18. The Board is mindful of the impact fees may have on practitioners and makes every effort to balance fulfilling its statutory responsibilities against such impacts.
19. A copy of the Board's Annual Report and financial statements for the year ending 31 March 2016 are available on the Board's website located at www.psychologistsboard.org.nz under the "Frequently Used Resources" heading on the home page. (The 2017 Annual Report should also be available on our website before the end of the year.)

To comment:

Please send us your feedback on the above proposals by January 8th, 2018. The Board will make its decisions by mid-January, so that the fees can be gazetted in time to take effect by February 19th, 2018. The Board's final decisions will be communicated via our website and the New Zealand Gazette.

Feedback can be submitted via:

Online portal:

<http://neuropsychappfees.questionpro.com>

Email:

consultation@nzpb.org.nz

Subject line: **Fee consultation 2017**

Mail:

Fee consultation 2017
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