



New Zealand
College of Midwives

TE KĀRETI O NGA KAIWHAKAWHANAU KI AOTEAROA

Midwifery Council

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Feedback on Consultation: Midwifery Council Fees for the 2021-2022 Practising Year

The New Zealand College of Midwives (the College) is the professional organisation for midwifery. Members are employed and self-employed and collectively represent over 90% of the practising midwives in Aotearoa New Zealand.

Introduction

The College has received a large volume of comments and concerns from its members on the Midwifery Council proposal to increase APC fees and welcomes the opportunity to provide formal feedback on the Consultation document Midwifery Council Fees for the 2021-22 Practising Year.

The College recognises the role of the Midwifery Council, as a Responsible Authority under the Health Practitioners Competence Assurance Act 2003 (HPCA Act 2003), to set health practitioner fees to enable the Council to meet its statutory obligations.

The College also recognises that the midwifery profession in Aotearoa New Zealand is reasonably small in number compared with some other health professions, for example nursing. Therefore the cost of supporting the regulatory body to meet its statutory requirements is carried by a relatively small group.

As Council will be aware the midwifery profession continues to struggle with a number of stressors that have not yet been fully addressed to effectively support the profession and recognise the value of the work midwives do. These stressors include increasing workloads, poor staffing levels, lack of support from employers and Ministry of Health, increasing expectations on the profession, lack of resources and lack of reasonable remuneration levels. These and other issues are contributing to low morale and the subsequent loss of midwives or reduction in FTE within the profession. We urge the Council to seriously consider these issues when contemplating an increase in fees as any increase has the potential to significantly affect the sustainability of individual midwives and the profession as a whole.

We understand that all midwives have the opportunity individually to provide feedback on the consultation document. The College has also received specific comments from our members which have formed the basis of this submission.

The size of the proposed increase, the short time frame given for consultation and the period over which consultation is taking place (Christmas/New Year) has raised members concerns.

Annual Practising Certificate Increase

The proposed Annual Practising Certificate fee represents an increase of more than 50% on the 2020-2021 fees. This unusually high increase in fees has caused considerable consternation among our members. While the College recognises that the proposed fee schedule reflects fees of other similar sized professions, the sudden and steep increase is causing concern and could potentially cause financial hardship for some midwives.

The consultation document identifies that there have been many years with no or minimal fee increases, however the volume of increase proposed for the coming APC year will place a large financial burden on many of our members. The College suggests that serious consideration be given to the adoption of an incremental increase over a period of time, for example 3 years. This would be a fairer process and less onerous for individual midwives to manage. Over the longer term we would encourage the Council to develop a transparent plan for incremental increases.

Issues affecting employed midwives

Midwives who are employed are able to have their fees reimbursed by their employers; however our employed midwife members have raised their concerns with the volume of the fee increase and the difficulties they will experience in paying it. This is because employed midwives are required to pay the fee first and then apply to their employer for reimbursement. While the Council chooses to manage the APC fees in this way rather than through the historical bulk funding arrangement, the individual midwife is often disadvantaged because the DHB reimbursement processes can take up to a month or longer. A number of our employed midwife members have stated that they do not have the disposable income to accommodate the expected increase of \$225 as a one off payment. The size of the proposed fee increase has the potential to cause financial hardship due to the delays often experienced with reimbursement from employers.

Consultation concerns

The notification and consultation on this proposed increase just prior to and during the Christmas period and with less than 3 months' notice does not recognise the annual budget timeframes that most employers and DHB's work within. Midwifery managers will have already accounted for the expected costs of the APC commitments to the institution for the 2021 year and budgeted for this. The significant percentage increase proposed will add tens of thousands of dollars to the budget for some of the larger. This has the potential to cause budget restrictions leading to fewer midwifery positions available within the budget year. The College understands that midwifery leaders will be submitting on the effect of this proposal for their workforce.

Additional Work/Project Costs

The Council has identified a number of work streams and projects that it is undertaking. A significant impetus for an increase in fees would appear to be due to the cost of this work and associated administration requirements which are not able to be met through the current fee structure. The Council's consultation document identifies the work it is undertaking but

we suggest there needs to be clearer explanation on the need for and value of this work as part of a Regulatory Authority's statutory responsibilities. From the feedback the College has received in relation to the Council proposal our members are unclear as to why the work, and therefore the expenditure, has to be addressed in one financial year. Our members are asking what investigation of alternative options has been undertaken and what the future budgetary expectations for these work streams are.

The College recognises the responsibilities Council has to ensure that it meets legislative requirements and that its processes are fit for purpose. The consultation document does not identify the due diligence the Council has undertaken prior to instigating new work streams. Our members however need reassurance that every effort has been made to ensure the work can be completed as economically as possible given the financial responsibility the Council expects the profession to bear.

Summary

The College understands the regulatory requirements the Council has to ensure the protection and safety of the public and that the costs to enable the prescribed processes need to be met. The midwifery profession is not a large group compared to some other health professional groups therefore the costs of the Council regulatory processes rely on this small number for funding. The cost of these processes put more pressure on individual midwives when the whole profession is feeling particularly stressed.

The proposed increase in APC fees of over 50% is a huge expectation on individual midwives and the College urges the Council to give serious consideration to the adoption of an incremental increase over a period of time for example 3 years which would be a fairer process and less onerous for individual midwives to manage.

The College also urges the Council to consider introducing an incremental payment plan to enable midwives to meet fee requirements in a fairer way to reduce the effect on them of unexpected or unplanned for fee increases.

Our members need reassurance that every effort has been made to ensure that proposed undertakings by Council can be completed as economically as possible given the financial responsibility the Council expects the profession to bear.

The College appreciates the opportunity to provide feedback to the Council on the consultation document.

Ngā mihi,



Jacqui Anderson

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