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CONSULTATION ON VETBOARD REGULATORY FEES 2023-2024

VETERINARY PRACTITIONERS REGISTRATION BOARD OF
VICTORIA

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BACKGROUND

In February 2023, the Veterinary Practitioners Registration Board of Victoria (“the Vetboard”) engaged in a formal consultation process with registered veterinary practitioners and veterinary students about the following proposed changes to the Vetboard’s fee structure:

1. an increase of 15% for most regulatory fees including fees payable for registration and renewal of registration
2. new fees to recover the cost of processing applications to vary registration conditions, convert general registration to non-practising registration, and refund registration fees
3. a reduced administration fee for non-practising veterinary practitioners converting back to general registration
4. an increased administration fee for registration applications involving complex issues, and
5. revocation of the Board’s policy to waive general registration fees of “honorary” veterinary practitioners who have practised for 50 years or more. While honorary practitioners holding general registration will be required to pay full general registration fees, the fees of honorary practitioners who hold non-practising registration will continue to be waived.

In the consultation, which commenced 10 February and ended on 8 March 2023, 3,970 registered veterinary practitioners were invited to consider the proposed fee changes and provide feedback via Victorian Government website Engage Victoria. Students in the Doctor of Veterinary Medicine course at the University of Melbourne were also invited to participate.

Of the 3,970+ persons invited to participate in the fee consultation, 500 responded to the 5 questions set out below.

SURVEY QUESTIONS

The first 4 questions below were presented as statements to which respondents could indicate their agreement or disagreement on a sliding scale, i.e., they could agree, strongly agree, disagree, strongly disagree or neither agree or disagree (neutral position) with the statement. Question 5 asked respondents to provide written comments about the impact of proposed fee changes.

Having considered the changes to the Vetboard’s fee structure, to what extent do you agree or disagree with the following statements:

Question 1 Overall, I agree with the Vetboard’s fee restructure proposal.

Question 2 The proposed increase of 15% is appropriate.

Question 3 The introduction of new fees to recover the costs of processing applications, to vary registration conditions, to convert to non-practising registration (and vice versa) and to refund registration fees is appropriate.

Question 4 The revocation of free honorary general registration requiring them to pay full general registration fees is appropriate.

Question 5 What impacts, if any, would the proposed fee changes have on you if they are made?

In addition to the questions above, the consultation included general questions for the purpose of categorising respondents, covering the type of registration they held, how long they had been in practice, and their salary range, geographical location and type of practice.

Demographic and professional information about the respondents and their responses to the survey are presented in the sections below.

RESPONDENT DEMOGRAPHIC AND PROFESSIONAL INFORMATION

Of the 500 persons who responded to the consultation, most held general registration (86%) and worked in the Melbourne metropolitan area (66%) in small animal practice (64%). The length of time respondents had been practising varied and they reported a range of incomes.

A breakdown of demographic and professional information about the respondents is provided in Figures 1 to 5 below.

Figure 1: What type of registration do you hold?

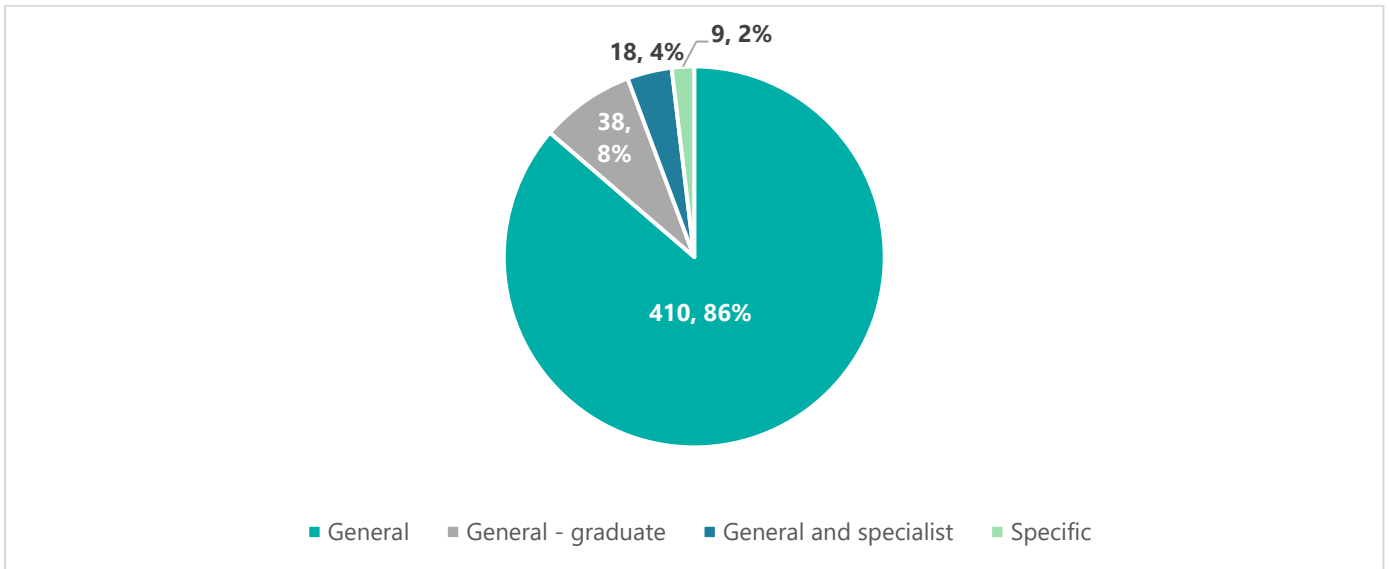


Figure 2: How long have you been practising as a veterinary practitioner?

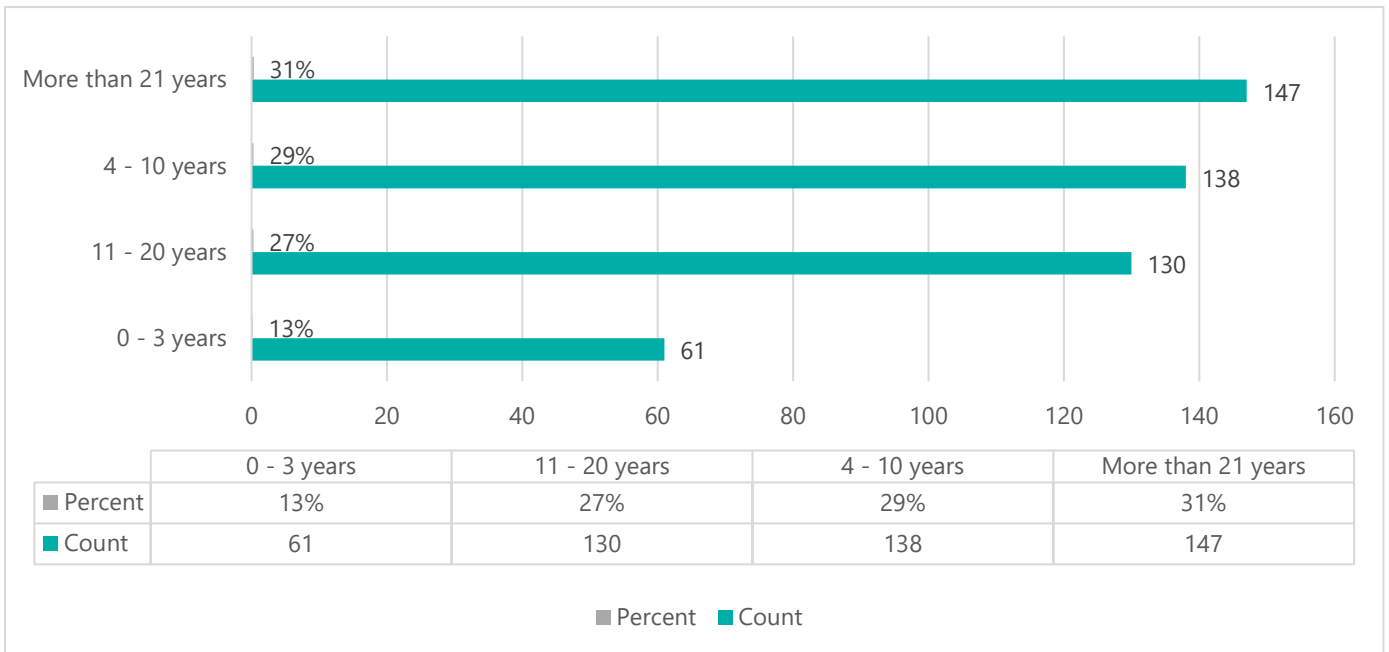


Figure 3: What is your salary range?

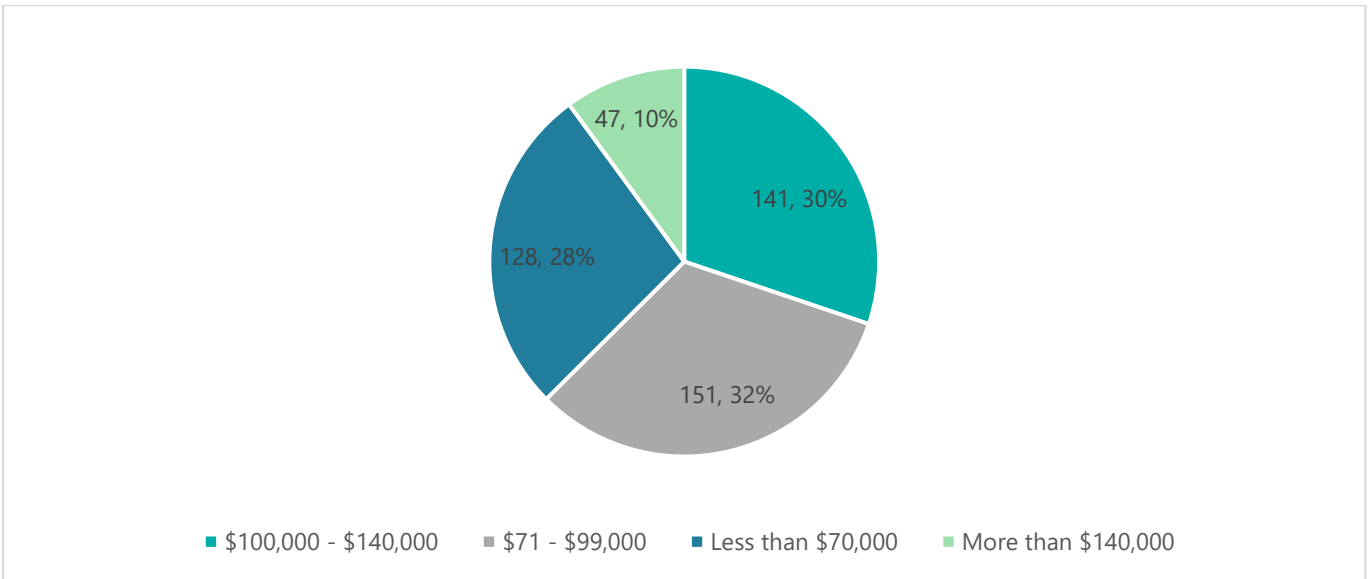


Figure 4: Where is your practice based?

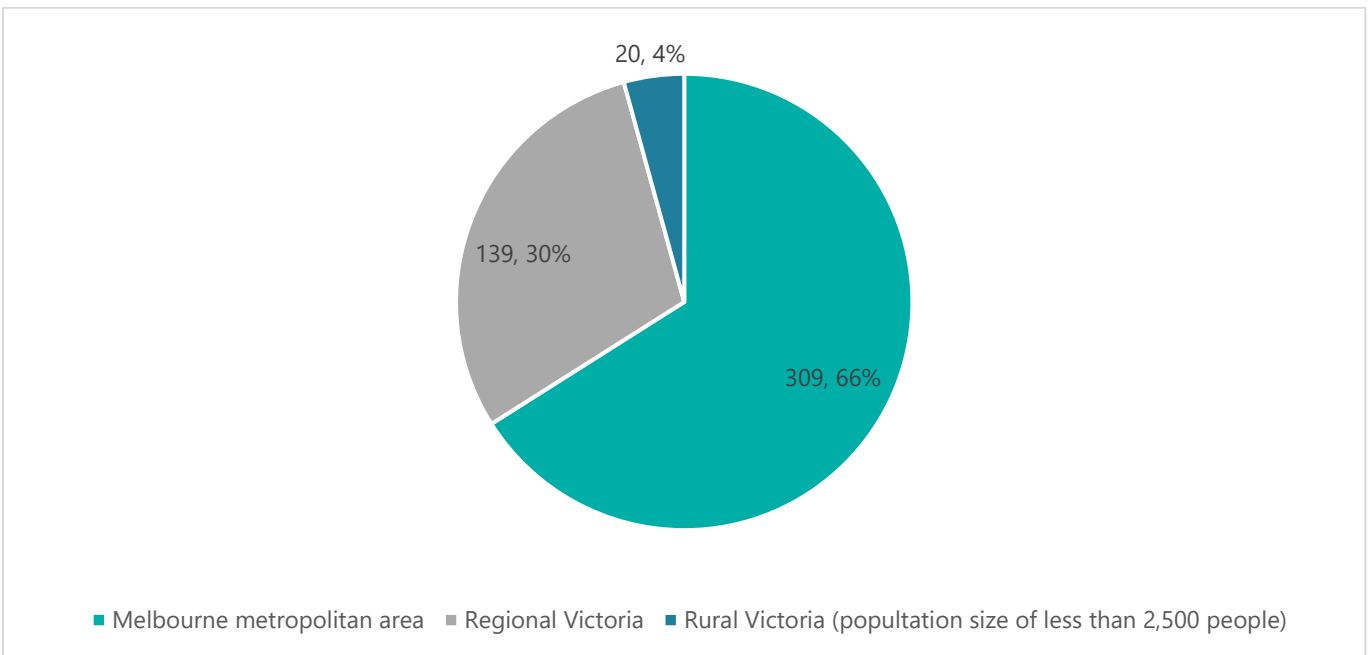
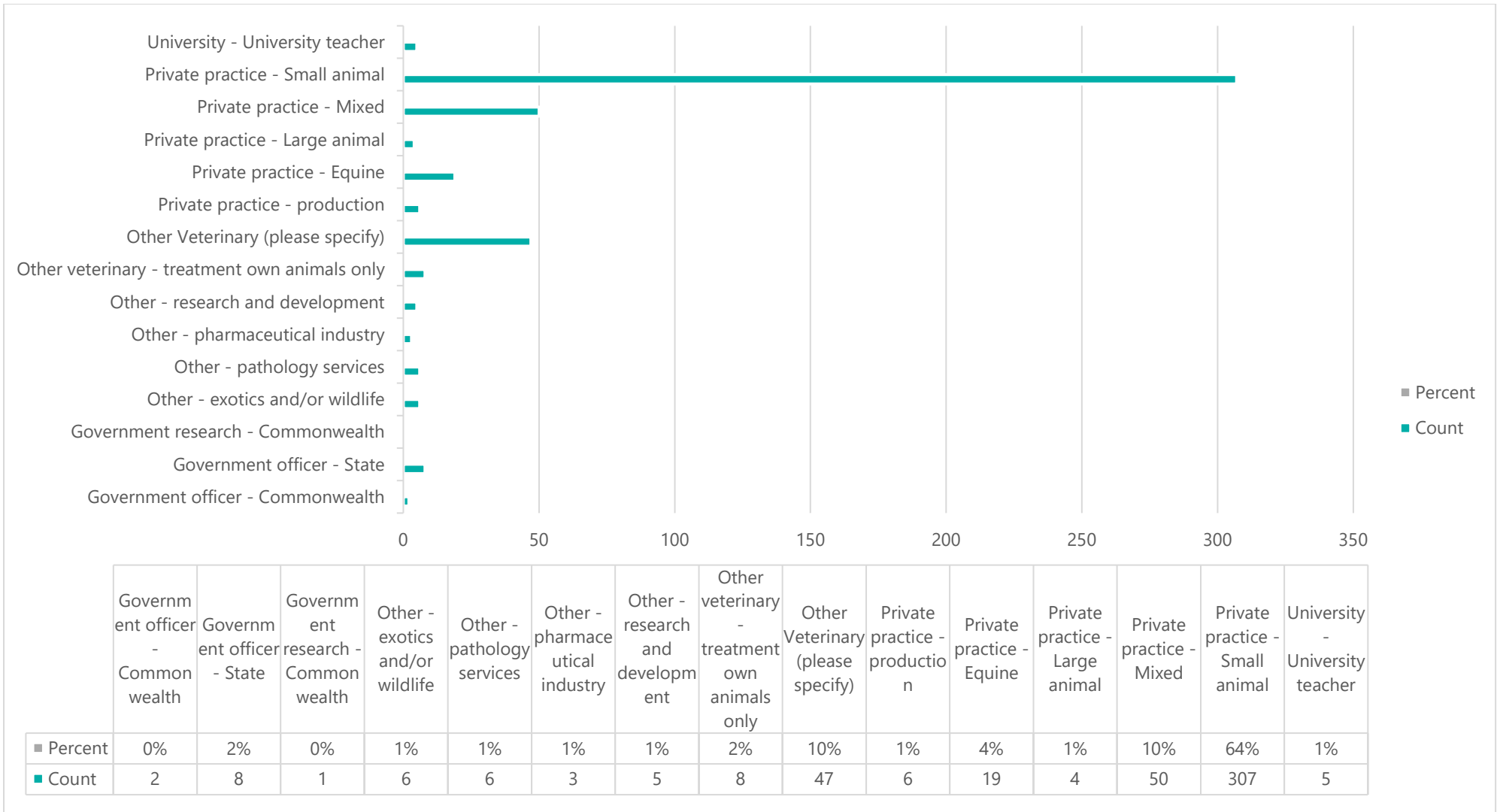




Figure 5: What is your type of practice?



RESPONSES TO FEE SURVEY

The Vetboard received just under 500 responses to its consultation on proposed changes to Vetboard regulatory fees 2023-2024. The total number of responses amounted to approximately 12.5% of veterinary practitioners registered in Victoria. Note that some responses received were from veterinary students who are not yet registered in Victoria.

SUMMARY OF ANSWERS TO QUESTIONS 1 TO 4

Respondents' answers to the survey questions 1 to 4 are set out in Table 1 below.

Table 1: Breakdown of respondents' answers to survey questions 1 to 4

Survey question	Agree	Disagree	Neutral
Overall, I agree with the Vetboard's fee restructure proposal.	14%	81%	5%
The proposed increase of 15% is appropriate.	18%	74%	8%
The introduction of new fees to recover the costs of processing applications, to vary registration conditions, to convert to non-practising registration (and vice versa) and to refund registration fees is appropriate.	31%	55%	14%
The revocation of free honorary general registration requiring them to pay full general registration fees is appropriate.	27%	59%	14%

A comparative breakdown of answers to survey questions 1 to 4 is set out in Figures 6 to 13 below.

Question 1 breakdown

Figure 6: Responses to survey question 1
 Overall, I agree with the Vetboard's fee restructure proposal

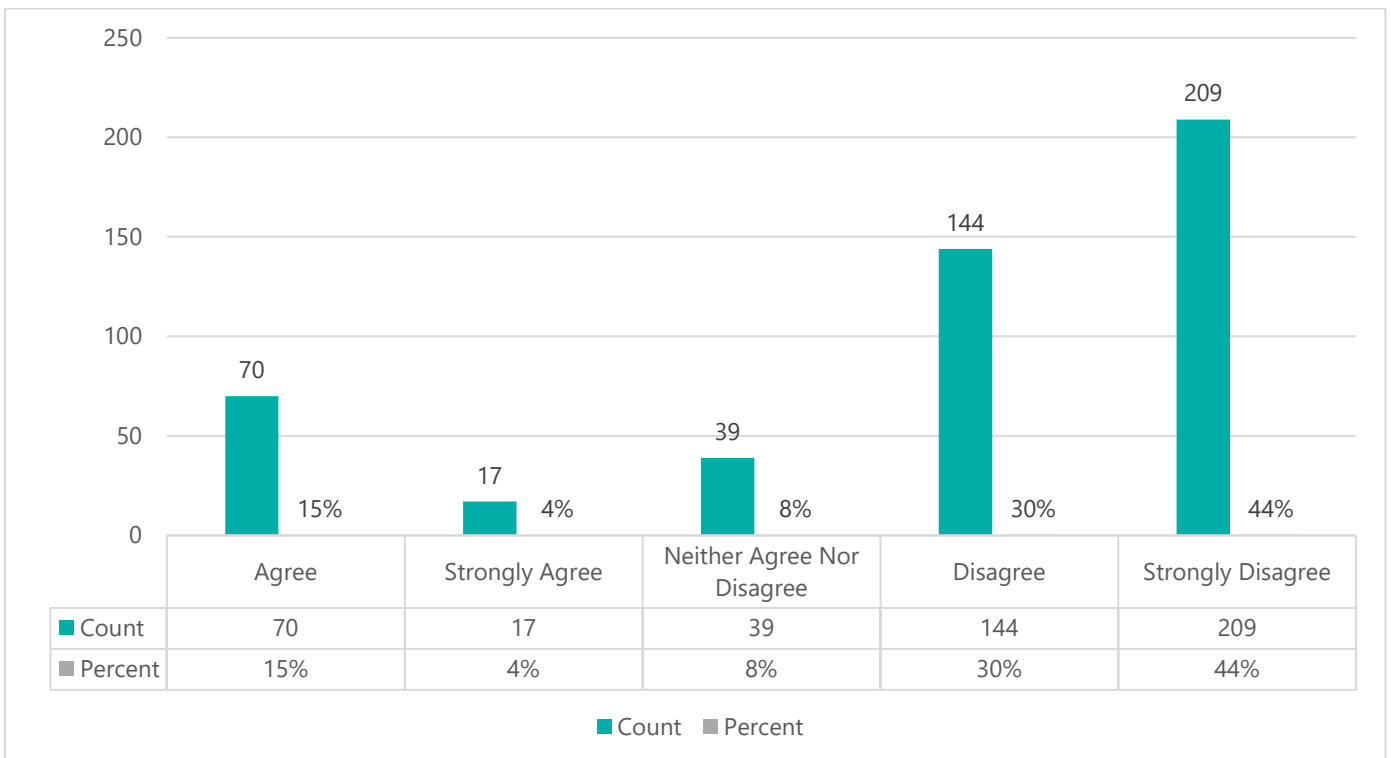
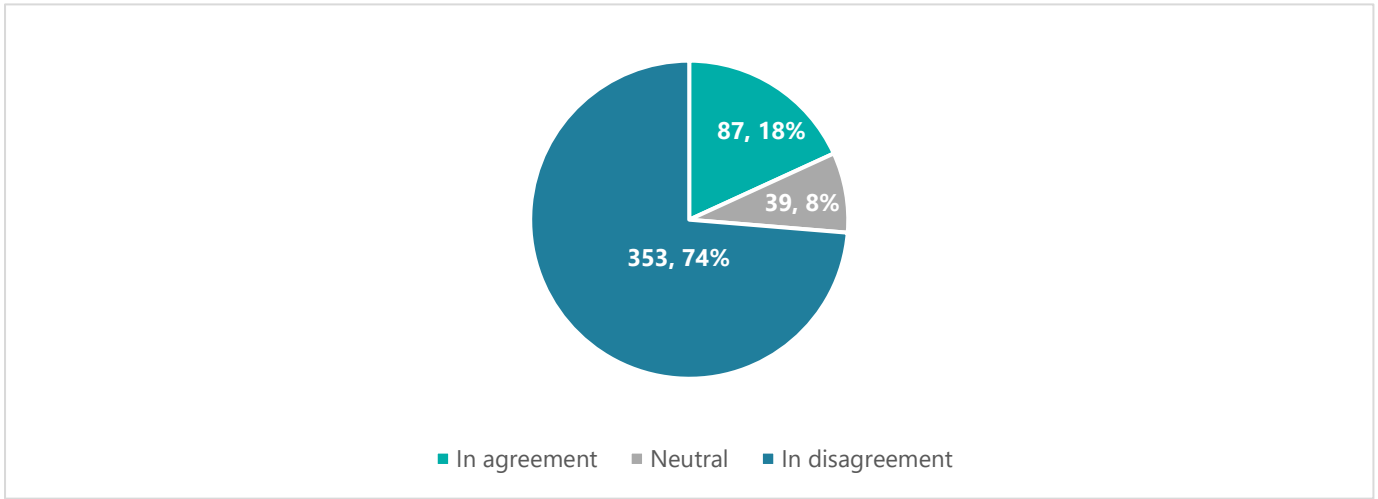


Figure 7: Responses to survey question 1
Overall, I agree with the Vetboard's fee restructure proposal



Question 2 breakdown

Figure 8: Responses to survey question 2
The proposed increase of 15% is appropriate.

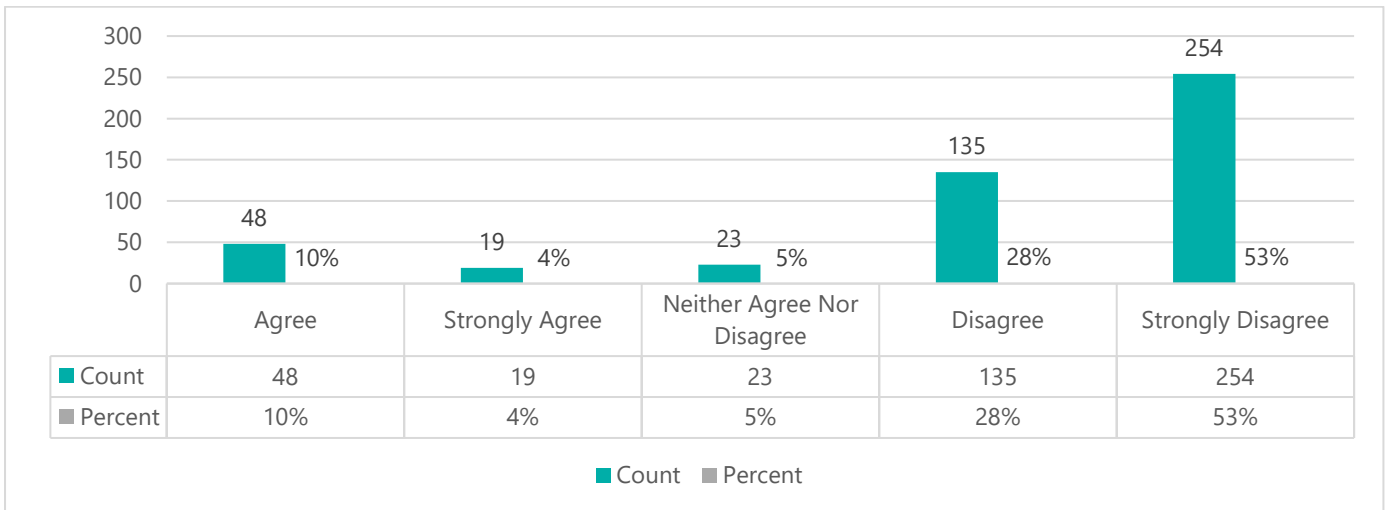
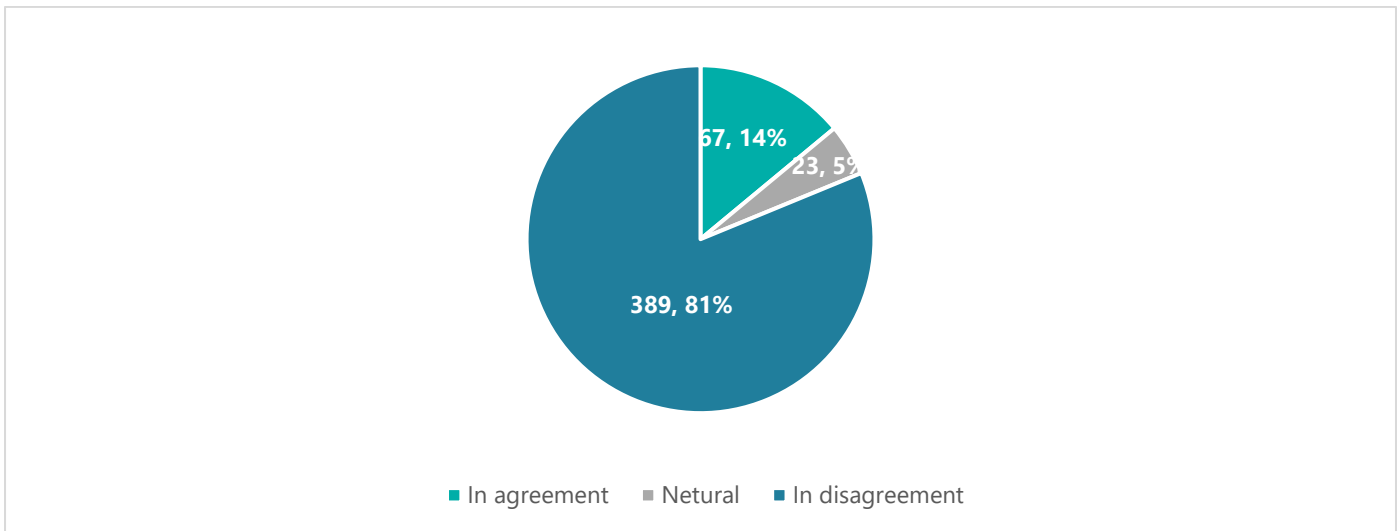


Figure 9: Responses to survey question 2
The proposed increase of 15% is appropriate.



Question 3 breakdown

Figure 10: Responses to survey question 3

The introduction of new fees to recover the costs of processing applications, to vary registration conditions, to convert to non-practising registration (and vice versa) and to refund registration fees is appropriate

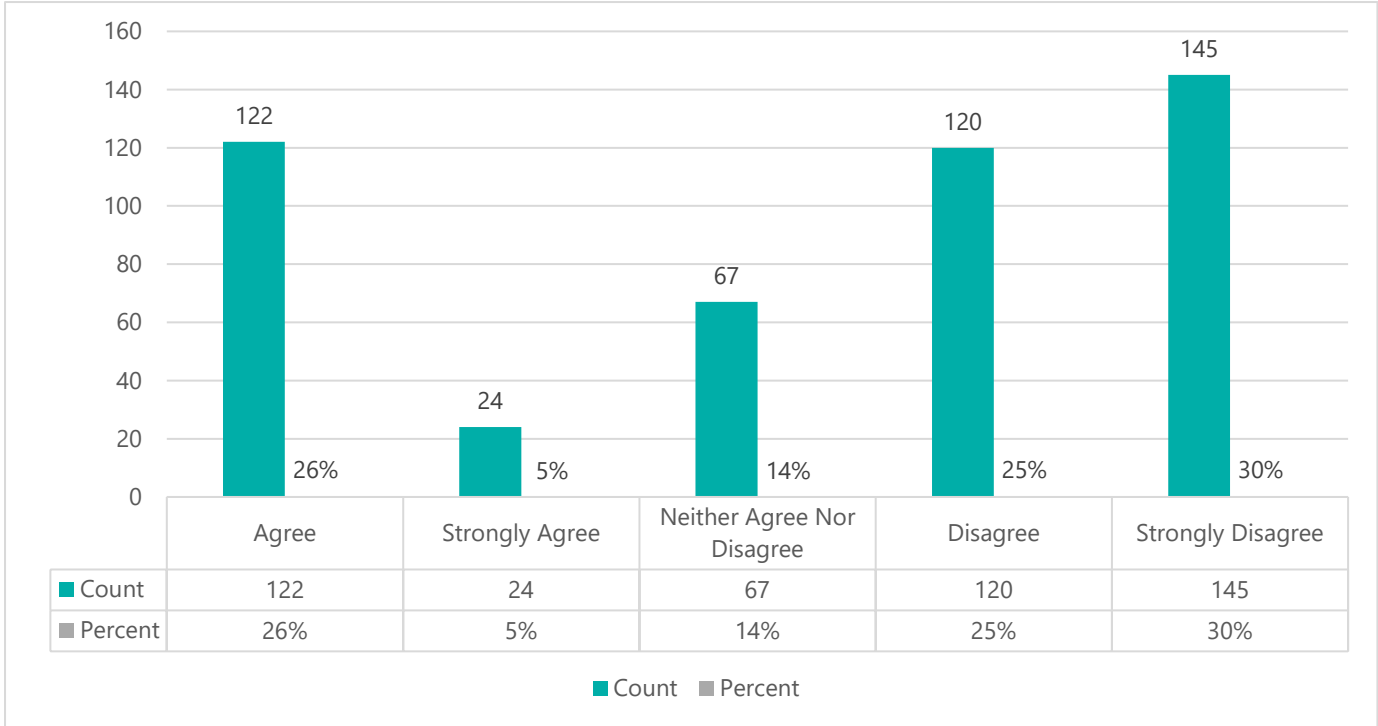
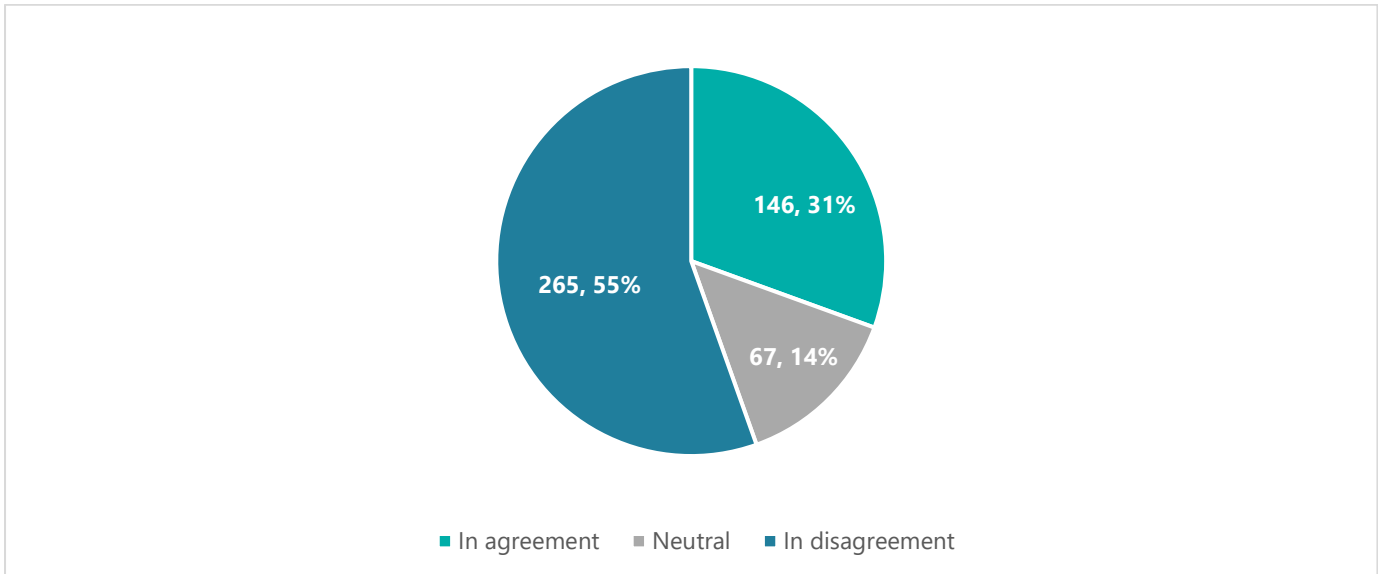


Figure 11: Responses to survey question 3

The introduction of new fees to recover the costs of processing applications, to vary registration conditions, to convert to non-practising registration (and vice versa) and to refund registration fees is appropriate



Question 4 breakdown

Figure 12: Responses to survey question 4

The revocation of free honorary general registration requiring them to pay full general registration fees is appropriate.

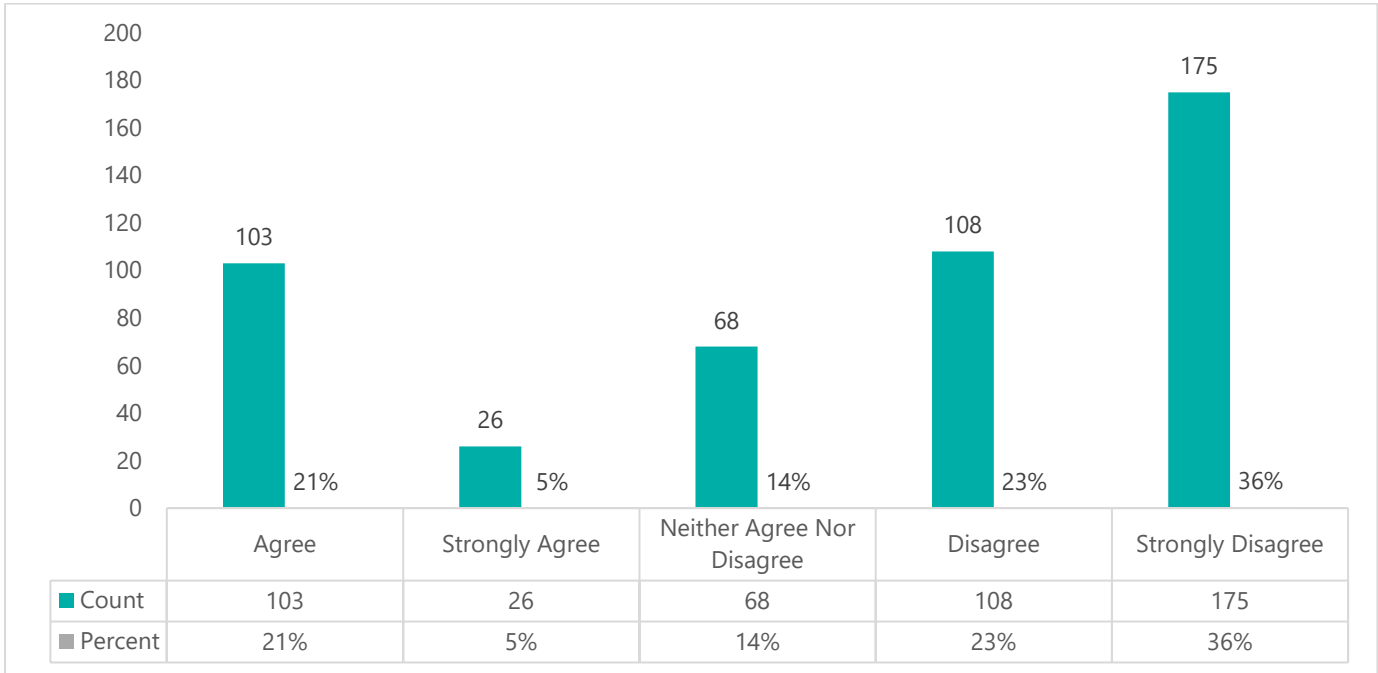
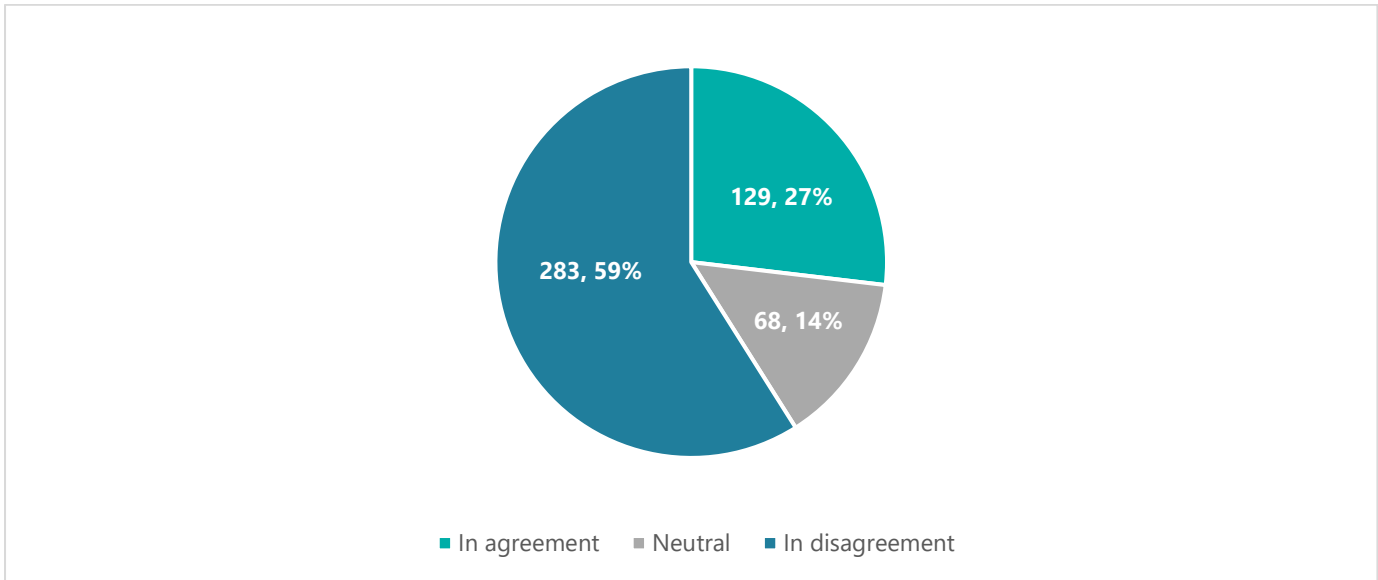


Figure 13: Responses to survey question 4

The revocation of free honorary general registration requiring them to pay full general registration fees is appropriate.



SUMMARY ANSWERS TO QUESTION 5 ON IMPACT OF PROPOSED CHANGES

Question 5, 'What impacts, if any, would the proposed fee changes have on you if they are made?', prompted a range of feedback from respondents.

Concerns about proposed fees

Most respondents expressed concerns about the proposed fee increase. These concerns are summarised in the table below.

Table 2: Summary of concerns about the proposed fee increase

Primary concern	Breakdown of concerns provided by respondents
Current financial/economic conditions	The high cost of living is causing financial discomfort and, in some cases, distress for veterinary practitioners and their families.
Current working conditions for veterinary practitioners	<ul style="list-style-type: none"> The respondent had not received a wage increase. The respondent's employer does not cover the cost of their registration. The respondent only works part time. There is poor mental health and high attrition rates in the veterinary profession.
Regulatory costs should be shared or shouldered by others	<ul style="list-style-type: none"> Complainants should pay to make a complaint. "Guilty" veterinary practitioners should be made to pay for complaints. The Government should contribute to funding the regulation of the profession.
The Vetboard triages and investigates complaints inefficiently	<ul style="list-style-type: none"> Complaints are largely vexatious. Vetboard investigation is overzealous.
Outsourcing of legal work	<ul style="list-style-type: none"> The Vetboard should have considered alternative less expensive options. The Vetboard could have delayed work until it was more fully resourced.
No or minimal value for fees paid	<ul style="list-style-type: none"> The Vetboard's only purpose is to protect the public. The Vetboard does nothing to protect vets. The Vetboard does not stop non-vets from performing veterinary work. The Vetboard has no preventative engagement with the veterinary profession. Investigations conducted by the Vetboard are stressful, demoralising and inordinately long.
Veterinary practitioners who have been practising for more than 50 years should not have to pay for general registration	<ul style="list-style-type: none"> Waiving general registration fees for vets who have practised for 50 years or more is a sign of gratitude and respect for years of service. Vets in this category are mostly caring only for their own animals and those of family and friends. Vets in this category use their registration for altruistic purposes only.

Support for increased fees

While some of the respondents who expressed concerns about the impact of fee changes also indicated they understood the Vetboard’s need to fund its work, fewer than 50 of the 500 respondents *solely* expressed understanding or support of the Vetboard’s proposal to increase fees. A sample of those responses is provided in Table 3 below.

Table 3: Support/understanding of proposal to increase fees

Theme	Sample comments
Efficient and effective regulation of the veterinary profession is beneficial to the profession	<ul style="list-style-type: none"> • Important for the Vetboard to upgrade or regulate significant changes for improvements if required. • A well-funded and well-staffed Vetboard is critical for the continued management and operations of the Victorian veterinary community at a high professional standard. • The Vetboard’s role is to ensure acceptable standards of veterinary practice are met in Victoria, i.e., by registering qualified and suitable people and taking regulatory action when these standards are not met. This promotes community trust in the veterinary profession. Veterinary practitioners directly derive benefit from these services and it is appropriate that they bear the cost of the services. • The impact the fee increase will have on me by enabling my regulatory body to become more efficient and produce a high standard of regulation will help to improve the reputation and the pride I have in my profession. • My reputation as a professional and my family’s income streams are protected by the work the Vetboard does, and I understand and appreciate the issues (e.g., quality, complexity, quantity) that are driving operating costs up. I also understand that the Vetboard is conscientious in working towards more efficient systems and proportionate actions and I can see that work has value for me and the whole profession, so the fee rise is justified. Particularly at a time when vets’ incomes have risen so it isn’t disproportionate.
Fees too low	<ul style="list-style-type: none"> • If anything, your fee increase is too small, considering general costs recently, and should probably have been 25% to 30%. • The increase should be more. • As far as I can tell I’ll be paying 15% more next financial year. While that is a significant increase, fees have remained relatively similar for last several years, so this feels like catch-up and is likely appropriate.
Fees affordable	<ul style="list-style-type: none"> • As business has never been busier since the covid puppy boom, it is only logical that with more patients and clients come more complaints. But with it, generates more income for us; we should have to give some of our pay rises to you. • Cost a bit more, but otherwise feel fees are not high at all.
Persons still in general veterinary practice and earning an income should continue to pay fees regardless of their time in practice	<ul style="list-style-type: none"> • Honorary registrants who are still paid for practice should pay fees • If 50-year practitioners are earning fees, they should be pleased to assist with the necessary fees to administer the Veterinary



Theme	Sample comments
	<p>Board. Others can change to non practising status if they are not earning income from the profession.</p> <ul style="list-style-type: none"> I am of the opinion that if I was practising and earning a substantial income, I would and should be obliged to pay general registration fees.

OUTCOME OF FEE CONSULTATION

The members of the Board (“the Board”) carefully considered each response received through the consultation process. In addition to the information received via the consultation, they considered the Vetboard’s legislative duties and functions and their fiduciary duties as directors of the organisation. Other factors informing the Board’s decision on the fee structure included:

- the importance of ensuring the Vetboard’s financial viability for effective regulation of the veterinary profession
- the deterioration of the Vetboard’s financial health and erosion of its financial reserves over the past 3 years, due to several years of operating deficits
- the significant increase in the number (82 in FY 2019; 162 in FY 2022), complexity and legal cost of complaints, with an average complaint costing over \$10,000
- the “moral hazard” presented by a regulator not being able to regulate or instigate regulatory action in complex matters due to the expense of legal action
- the Vetboard’s compliance overheads being significantly greater (as a percentage of revenue) than that of other Victorian regulators, because it is subject to the full cost of compliance while its revenue is a fraction of larger state regulators
- recognition that a regulator cannot expect the taxpayer to subsidise regulation of the profession
- demographic and economic changes impacting the veterinary profession, and
- the need to invest in systems and processes that support an approach to regulation that is proactive, data-driven and effective, and enables the Board and Victorian Government to be well prepared to respond to Emergency Animal Diseases.

For these reasons, while recognising that the 15% increase in most fees and revocation of free honorary general registration may not be supported by all members of the profession, the Board decided to implement the changes to the Vetboard’s fee structure as originally proposed.

Registration and other regulatory fees for 2023-2024 can be viewed at www.vetboard.vic.gov.au > Vets > [Vetboard regulatory fees](#).

We have listened and will be seeking further input from the profession

The consultation highlighted a range of issues about the way the Vetboard works with the Victorian profession and the communities served by the profession. To help us further explore the issues raised in the consultation, the Vetboard will be running a series of online and in-person workshops with the profession between July and September 2023.

Actions the Vetboard is already committed to undertaking include:

- continuing to manage the Vetboard’s costs to ensure we deliver effective and efficient regulation
- continuing to investigate alternative potentially less expensive approaches which deliver regulatory outcomes with lower regulatory friction and less expense to veterinary practitioners, complainants and the Vetboard
- improving the education of complainants and veterinary practitioners to help complainants navigate complaint pathways
- addressing the issue of complaints that may be lacking in substance via education and clarification of complaint pathways, and
- effectively communicating the Vetboard’s work to the communities we serve.

PUBLICATION DETAILS

Document	Author	Date
VPRBV report on fee consultation 2023-2024	Veterinary Practitioners Registration Board of Victoria	May, 2023