

[REDACTED]

From: Jonathan Broadbent [REDACTED]
Sent: Monday, 5 December 2016 11:37 p.m.
To: Consultations
Cc: [REDACTED]
Subject: Re: Dental Council: Consultation on the 2017/18 draft budgets, APC fees, disciplinary levies and other fees
Attachments: APC and D-Levy fee comparison across health professions.pdf

Dear Mrs Warner & Dental Council team,

I write regarding your call for submissions on the proposed 2017/2018 budget, in particular the APC fees and disciplinary levy. Despite the fact that this does not directly affect me since my employer pays my APC fees and disciplinary levy on my behalf, I do have concerns about how the proposed increases will affect my employer, as well as how it will affect my colleagues in private practice. I also wish for an explanation as to why Dental Council requires oral health practitioners to pay considerably greater fees for APCs than other NZ health authorities require their practitioners to pay.

I have attached a graph which summarizes the most recently-gazetted fees for several key health professions. Rightly or wrongly, I have grouped together the types of health professionals that I see as having similar characteristics. The fees listed are those I identified as most-recently published in the NZ Gazette (except the planned 2017 fees for the oral health professions). I have attempted to take GST and disciplinary levies into account (note that all these health professions except medicine and dental report their fees inclusive of GST).

1. At the level planned for the 2017 combined APC fee & disciplinary levy, dentists will be paying 1.6 times what the Medical Council charges their doctors, nearly 1.9 times what the Pharmacy Council charges their pharmacists, 2.0 times what the Psychology Board charges their psychologists, and 2.5 times what the Physiotherapy Board charges their physiotherapists.
2. I believe dentists being overcharged for APCs, but other types of oral health practitioners are also being overcharged. I have compared the fees charged to medical laboratory scientists and anaesthetic technicians with those charged to dental technicians. The Dental Council is proposing to set their 2017 fees for dental technicians nearly 3.0 times greater than for medical laboratory science and around double those of anaesthetic technicians.
3. The proposed fees for dental therapists are nearly double what midwives are currently charged for their APCs and 6.5 more than what nurses are charged. A similar comparison could be made for dental hygienists.

Dental Council appears to set higher fees for dental professionals than similar health professions, and this is consistent across a range of examples. Why is it so much more expensive to register a dentist than a doctor, pharmacist, psychologist, or physiotherapist? Do particular challenges exist in regulating dental health professionals that do not exist for other types of health professionals?

Kind regards,

Jonathan Broadbent