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*Sent via email & post*

## **Submission to Dental Council.**

### **Consultation Document: 2017/18 budget, annual practising certificate fee and disciplinary levy for dentists and dental specialists.**

Thank you for the opportunity to submit to Council the views of the New Zealand Dental Association.

In the main we will confine our submission to the proposed budget and to the proposed fees for dentists and dental specialists as they are the two groups we represent within our membership- a membership now consisting of just on 98% of New Zealand's dental practitioners.

Our concerns and the questions we have to ask are as follows:

#### **A. Proposed 2017/18 Budget**

1. The Dental Council's 'personnel related costs' (actual in 2015/16 to proposed in 2017/18) have increased by some 23%. This is an unusually huge and unexplained increase and as such unacceptable to those (our members) who are funding the Council's activities. Because of this, in part, the Association is very much against the proposed budget and resulting APC levy. We understand that Council is a Government appointed body but it is our members who are required to fund its activities and this huge percentage increase in personnel costs simply does not reflect the current economics within dentistry in New Zealand.
2. The Association also notes the huge variation in planning and governance costs (2015/16 to the following year budget) and the consultation document also does not disclose why this is so. It is usual for such significant variances to be explained when seeking the views of funders, and we would like to understand more with regards to this aspect.
3. The Association has, on a number of occasions, and again expresses our genuine concern that Dental Council has misinterpreted the HPCA Act regarding setting of standards. The Council minutes dated Wednesday 24<sup>th</sup> August in our view continues the misinterpretation by describing the Council's belief that it 'has the statutory role to develop standards'. The fact remains, the Act states regulatory authorities are to set standards, and for over a decade the Council set the standard at the NZDA Code of Practice and clearly articulated the reason for that in various MOU's with the Association. We again raise this issue as we are entirely opposed to the Council levying our members to duplicate what is an efficient, well respected, well-resourced and appropriate standards process. Your proposed

budget, for a second year, again consumes over \$140000 in levies with respect to your new interpretation of the Act and move into this activity. We request that Council return to supporting the work the Association has for decades led in the area of standards development.

4. Lack of detail does make it difficult to comment fully on the document you have circulated. As an example, Page 10 states the Council's proposed total expenditure will be \$3,167,102. Page 12 of the same document states the Council's proposed total expenditure will be \$3,597,285. It is unusual to present two different 'total' expenditures. The difference appears to be attributable, in large part, to what is described as the dentists 'ongoing workstream' (\$310,779). The consultation document does not disclose what that work is and as such we are unable to meaningfully comment on this. Perhaps the answer is Council taking a more inclusive approach regarding development and implementation of its strategic plan and the workstreams that arise from it. Such an approach would better allow the Association and its members to understand these matters and what exactly as practitioners we are funding. At this point, having not been able to participate in the planning, we question whether modifying these workstreams could save cost whilst still allowing Council to meet the described regulatory functions under the HPCA Act. We request that you give consideration to being more inclusive in this regard.

#### **B. Proposed APC for dentists and dental specialists**

1. The Council is proposing a 2017/18 APC and Disciplinary levy for dentists and dental specialists of \$1205.27. The extremely high increase (over 20%) in two years (Actual 2015/16 – to proposed 2017/18) is simply unacceptable and unreasonable.
2. The cost of the Dental Council's disciplinary levy is relatively similar to other regulatory authorities the overall APC levies on practitioners registered by the Council bear no resemblance to that of all other health professions (attachment 1). Dentists are being levied at 160% that paid of doctors, 200% by that of pharmacists and psychologists, 250% that of physiotherapists. The Dental Council's cost structure (huge increase in staff costs and now the additional expenditure on duplicating standards) is resulting in very high levies. These also apply to dental therapists. We note that in providing APC's to Dental Therapists, it costs the Dental Council twice what it costs the Midwifery Council to provide APC's to midwives.  
Why is the Dental Council not proposing to meet their obligations under the Act with similar levies to all other health regulatory authorities?
3. It appears the anticipated savings in personnel and other costs through sharing premises with other regulatory authorities may not have eventuated and we seek information on the detailed analysis that was undertaken prior to and the results achieved in cost reduction achieved since the shared premises occurred.

Kind regards



**Susan Gorrie**  
President



**David Crum**  
CEO

## Most recently-gazetted APC fees and disciplinary levies

