

1 March 2018

Dear practitioner

**Consultation on the 2018/19 proposed budget, annual practising certificate fees, disciplinary levies and other fees effective from 1 April 2018**

Thank you for your feedback on this consultation. In total we received seven submissions from oral health practitioners, professional associations, government agencies and education institutions.

The submissions were considered by the Audit and Risk Management Committee at its meeting on 15 January 2018 and by Council at their meeting on 25 January 2018.

**Consultation outcome**

The Council carefully considered all of the work planned and budgeted over the next 2 year period and feedback from all submissions received. Following this review the following APC fee and disciplinary levies were approved by Council for the 2018/19 year.

Table 3: APC fee by Profession

Profession	Calculated fee \$	Min. operational reserve adj. \$	Net proposed fee \$
Dentists and dental specialists	911.25	(26.67)	884.58
Dental hygienists and orthodontic auxiliaries	572.99	37.95	610.94
Dental therapists	622.25	82.35	704.60
Dental technicians and clinical dental technicians	674.96	(36.73)	638.23
Oral health therapists	560.78	103.07	663.85

Table 4: disciplinary levy by profession

Profession	Calculated levy \$	Min. disciplinary reserve adj. \$	Net proposed levy \$
Dentists and dental specialists	166.61	(79.92)	86.69
Dental hygienists and orthodontic auxiliaries	14.44	110.73	125.17
Dental therapists	7.35	82.72	90.07
Dental technicians and clinical dental technicians	29.67	69.91	99.58
Oral health therapists	21.03	133.16	154.19

All other fees have been uplifted by 2% as set out in the consultation document. The fees were published in the NZ Gazette on 8 February 2018.

A table summarising the other main themes coming through the submissions is attached as Appendix 1.

### **Further analysis in relation to the APC fee and disciplinary levy for dental hygienists, orthodontic auxiliaries and dental therapists**

One professional organisation and two practitioners were concerned about the increase in APC fee for dental hygienists and orthodontic auxiliaries and dental therapists. As a result further analysis is provided below.

Excluding GST, a breakdown of the APC fee and disciplinary levy for dental hygienists and orthodontic auxiliaries (table 1) shows an overall increase of \$53.03 for the APC fee and an overall increase of \$129.50 for the disciplinary levy.

**Table 1: APC fee and disciplinary levy for dental hygienists and orthodontic auxiliaries**

	<b>2017/18</b>	<b>2018/19</b>	<b>Movement</b>
APC fee	557.91	610.94	53.03
Disciplinary levy	(4.33)	125.17	129.50
Total excl GST	553.58	736.11	182.53
GST	83.04	110.42	27.38
Total incl GST	636.62	846.53	209.91

The increase in the APC fee is the result of additional costs incurred by Council predominantly related to business continuity as a result of the Kaikoura earthquake, a lower volume of registration applications, and the transfer of the operating reserve balance relating to practitioners who hold a dual scope of practise in dental hygiene and therapy to the oral health therapists operating reserve.

A minimum operating reserve balance of \$41,335 is required to sustain the dental hygienist and orthodontic auxiliary profession. The 2018/19 budgeted operating reserve opening balance is a deficit of \$(7,395). Council can address reserve shortfalls over a two year period and as a result, the operational reserve requires additional funding of \$24,365 (equivalent to \$37.95 per practitioner).

There has been significant hygienists disciplinary activity during 2017/18 and, as a result, the 2018/19 budgeted disciplinary reserve opening balance is expected to be overdrawn by \$(44,088) with a Professional Conduct Committee (PCC) and a Health Practitioner Disciplinary Tribunal (HPDT) hearing to be held in 2018/19. Additional funding of \$71,088 (equivalent to \$110.73 per practitioner) is required to return the disciplinary reserve to its minimum balance.

Excluding GST, a breakdown of the APC fee and disciplinary levy for dental therapists (table 2) shows an overall increase of \$84.53 for the APC fee and an overall increase of \$92.32 for the disciplinary levy.

**Table 2: APC fee and disciplinary levy for dental therapists**

	<b>2017/18</b>	<b>2018/19</b>	<b>Movement</b>
APC fee	620.07	704.60	84.53
Disciplinary levy	(2.25)	90.07	92.32
Total excl GST	617.82	794.67	176.85
GST	92.67	119.20	26.53
Total incl GST	710.49	913.87	203.38

As with hygienists, the top-up of the minimum reserve is the result of additional costs incurred by Council predominantly related to business continuity, a lower volume of registration applications, and the transfer of the operating reserve balance relating to practitioners who hold a dual scope of

practise in dental hygiene and therapy to the oral health therapists operating reserve. Accordingly the therapists operating reserve is below the minimum acceptable level.

A minimum operating reserve balance of \$43,273 is required to sustain the dental therapist profession. The 2018/19 budgeted operating reserve opening balance is overdrawn by \$(74,649). Council can address reserve shortfalls over a two year period and as result a contribution of \$58,961 is required (equivalent to \$82.35 per practitioner).

There has been significant therapists' disciplinary activity during 2017/18 and, as a result, the 2018/19 budgeted disciplinary reserve opening balance is overdrawn by \$(32,226). The disciplinary reserve requires funding of \$59,226 (equivalent to \$82.72 per practitioner).

Yours sincerely

A handwritten signature in black ink, appearing to read "Marie Warner". The signature is written in a cursive, flowing style.

Marie Warner  
Chief Executive

## Appendix 1: Submission themes and responses

Other queries (and Council's responses) from the submissions to the consultation document on the 2018/19 proposed budget, annual practising certificate fees, disciplinary levies and other fees effective from 1 April 2018.

Theme	Council response
Part-time work not reflected in the APC fee	<p>Activities required to fulfil our statutory responsibilities such as accreditation, the setting of standards or scopes of practice are on a per registered person basis rather than on the number of hours each person is employed within the profession.</p> <p>In addition, the volume of activity required to grant an APC is similar applicant to applicant, regardless of whether the applicant is practising on a full-time or part-time basis.</p>
Payment of fees to Council and then have to seek refund from DHB's	<p>With the introduction of the new IT system practitioners will be able to apply for their APC online, and once their applications are complete, and paid for, they will download their new practising certificates themselves which will streamline the process significantly.</p> <p>The new online system for APC renewal requires practitioners to process their online application form and payment and therefore does not have the capability to receive bulk payments from employers – e.g DHB. This change was communicated to all DHBs in August 2017.</p> <p>Whilst the IT system is not going live with online APC's for the 1 April 2018, some DHB have chosen to continue with the amended process of requiring practitioners to submit their own application and payment.</p> <p>In accordance with section 17 of the Health Practitioners Competence Assurance Act 2003 practitioners are responsible for payment of the fee:</p> <p>17 Applications for registration of health practitioners and authorisations of scopes of practice</p> <p>(1) This section applies to every application by—</p> <p>(a) a person who applies to be registered as a health practitioner permitted to practise within a scope of practice; and</p> <p>(b) every health practitioner who applies for a change in the authorisation of his or her existing scope of practice.</p> <p>(2) Every application to which this section applies must be made to the responsible authority, and must—</p> <p>(a) be made in a form, and contain the information, that is determined by the authority; and</p> <p>(b) be accompanied by—</p> <p>(i) an indication of the scope of practice within which the applicant proposes to practise, or, as the case requires, an indication of the changes the applicant wishes to have made to his or her existing scope of practice; and</p> <p>(ii) any evidence in support of the application that is required by the authority; and</p> <p>(iii) the fee (if any) set by the authority.</p>

## Appendix 2: Other fees

Fee	Current fee \$	Fee from 1 April 2018 \$
Retention fee	110.16	112.36
Application fee to transfer from non-practising to practising status, where application is subject to Council's recency of practice policy	279.36	284.95
Application for registration fee	465.61	474.92
Application for registration for overseas applicant with prescribed qualifications and experience	1,164.04	1,187.32
Application for registration for applicant with non-prescribed qualifications and experience to be registered under section 15(2) of the Act for Dentists, hygienists, therapists, clinical dental technicians, dental technicians, orthodontic auxiliaries	3,513.56	3,583.83
Application for registration for applicant with non-prescribed specialist qualifications and experience to be registered under section 15(2) of the Act for dental specialists	4,479.72	4,569.31
Resubmission of application for assessment of non-prescribed qualifications and experience to be registered under section 15(2) of the Act	2,734.88	2,789.58
Application for removal of an exclusion(s) on the scope of practice after completion of a Dental Council approved course for hygienists, therapists and orthodontic auxiliaries	256.08	261.20
Application for removal of an exclusion(s) on the scope of practice after completion of a course not approved by the Dental Council for hygienists, therapists and orthodontic auxiliaries	465.61	474.92
Application for registration with a prescribed qualification in an additional scope of practice for therapists and clinical dental technicians	465.61	474.92
Application for registration with a non-prescribed qualification in an additional scope of practice for therapists and clinical dental technicians	719.86	734.26
Application to undertake supervised activities for orthodontic auxiliaries while undertaking an approved training course.	93.11	94.97
The New Zealand Dental Hygiene Registration Examination		
NZDHREX - written examination where there are fewer than a total of five candidates sitting the same examination	3,131.30	3,193.93
NZDHREX - written examination where there is a total of five or more candidates sitting the same examination	2,570.00	2,621.40
NZDHREX - clinical examination where there are fewer than a total of five candidates sitting the same examination)	4,846.61	4,943.54
NZDHREX - clinical examination where there is a total of five or more candidates sitting the same examination	4,330.30	4,416.91

Fee	Current fee \$	Fee from 1 April 2018 \$
The New Zealand Dental Therapy Registration Examination		
NZDTREX - written examination where there are fewer than a total of five candidates sitting the same examination	3,131.30	3,193.93
NZDTREX - written examination where there is a total of five or more candidates sitting the same examination	2,570.00	2,621.40
NZDTREX - clinical examination where there are fewer than a total of five candidates sitting the same examination	4,846.61	4,943.54
NZDTREX - clinical examination where there is a total of five or more candidates sitting the same examination	4,330.30	4,416.91
The New Zealand Dental Technology Registration Examination		
NZDTechREX - Combined Examination where there are fewer than a total of five candidates sitting the same examination	3,871.51	3,948.94
NZDTechREX - Combined Examination where there is a total of five or more candidates sitting the same examination	3,263.05	3,328.31
The New Zealand Dental Specialist Registration Examinations		
New Zealand Dental Specialist Registration Examination	18,277.13	18,642.67
Professional standards programme fees <sup>1,2,3</sup>		
Supervision <sup>1,2,3</sup> (12-month programme)	5,996.28	6,116.21
Oversight <sup>1,2,3</sup> (12-month programme)	3,891.00	3,968.82
Competence/Recertification Programme <sup>1,2,3</sup> :		
Distance learning - per module	3,013.80	3,074.08
Clinical training - per practice area of training	5,157.84	5,261.00
Health programme fees <sup>1,2</sup>		
Drug and alcohol screening programme, set up and administration <sup>1,2,3</sup>		
Set-up and administration for the first 12 months	852.23	869.27
Administration fee for each 12 month period thereafter	426.11	434.63
Third party testing <sup>1,3</sup> - fee per test	122.40	124.85
<p><sup>1</sup>Fee will be adjusted for any specific requirements of the individual programme and third party costings at the time the programme is established.</p> <p><sup>2</sup>The practitioner will be charged direct professional fees and travel and accommodation expenses for supervisors, those providing oversight, tutors, course administrators etc. These expenses will be charged on an actual and reasonable basis in accordance with the Dental Council's fees and payments and expenditure decisions and probity policies. Course materials, venue costs and administration expenses such as printing and postage will also be charged based on actual costs.</p> <p><sup>3</sup>The practitioner will be charged for secretariat administrative overheads at \$61.23 an hour.</p>		

Fee	Current fee \$	Proposed fee \$
Education fees		
Application for “removal of exclusion” course approval by providers <u>who do provide training</u> as part of a primary Dental Council accredited qualification	1,771.54	1,806.97
Application for “removal of exclusion” course approval by providers <u>who do not provide training</u> as part of a primary Dental Council accredited qualification	3,838.41	3,915.18
Application for approval of courses to equip registered oral health practitioners for registration in an additional scope of practice for course providers who do provide training as part of a primary Dental Council accredited qualification	3,444.44	3,513.33
Application for approval of courses to equip registered oral health practitioners for registration in an additional scope of practice for course providers who do not provide training as part of a primary Dental Council accredited qualification	6,031.11	6,151.73
Other fees		
Administration fee	45.00	45.90
Application for additional registration advice	465.61	474.92
Application for restoration to the register	465.61	474.92
Supply of certificate of good standing	93.11	94.97
Supply of replacement registration certificate or any other certificate	93.11	94.97
Supply of electronic copy of register	204.00	208.08