

Dear [REDACTED]

I am submitting a response to the consultation on the Dental Councils proposals for the draft 2019/2020 Budget, APC fees and disciplinary levies for oral health practitioners issued on the 18 October 2018.

It is with considerable concern that I am objecting to the cost of the dental hygienist Annual Practising Certificate given the increase in March 2018 was from \$636.62 to \$846.53 from the previous year( an increase of 33 %).  
Reasons given for the sharp increases are:

- ***A decreasing number of registered dental hygienists*** – this will continue to decrease as dental hygienists are no longer trained in New Zealand and current clinicians retire or resign.
- ***DCNZ need to maintain an operational reserve of money at the prescribed level for our trade*** – but if we are a decreasing pool why is the reserve to be kept at the original level?
- ***Disciplinary levies*** – why are law abiding dental hygienists are being punished for the dishonesty of other clinicians? Why aren't the dentists who sub contract or employ the offending dental hygienists being held accountable and disciplined? They have a duty of care to ensure that the APC are current and compliance is being made by the people they have working for them. Why should a dental hygienist in another part of the country be liable?

I would be so bold as to foresee our APC increasing continuously in years to come so that we may even surpass that of a dentist/dental specialist if the reasons you have given are adhered to.

Other healthcare professions also have APC they must pay in order to practice but can you explain why they are so shockingly less than ours? I have examples below from a list of many.

Doctors	\$680.60
Midwives	\$445.00
Nurses	\$110.00
Physiotherapists	\$354.00
Radiographers	\$275.00

Given the recent discussion in parliament and the media regarding the cost of dental treatment I would suggest it is time for the DCNZ to bring itself into modern times, to look at its general management of dental trades, and to, quite frankly, look at the changes

in housekeeping that are long overdue. I appreciate that the DCNZ is an establishment which is there to protect the general public but it has a duty of care to the practitioners. Those increases in our APC are ultimately passed onto the practices we work for and thus onto the public who are already paying a lot for their dental treatment. It is because of this last reason that I am also contacting my local MP about this matter. I am sure I am not the only person unhappy and submitting a response but I would hope that you, the DCNZ will not turn a deaf ear on us.

With Regards,  
Kelly O'Sullivan