

[REDACTED]
[REDACTED]
Dental Council of New Zealand
P.O Box 10-448
Wellington 6143

11th December 2018

Dear [REDACTED]

RE: Consultation on 2019/2020 budget, APC fees and disciplinary levies

My name is Jiljane Delaney and I am a registered dental hygienist. I would like to provide the following feedback on the Council's consultation on 2019/2020 budget, APC fees and disciplinary levies.

The consultation document clearly makes it clear that the Council budget, fees and levies are calculated at a 'full recovery basis' and while the Council is 'committed to operating cost effectively for our practitioners' that commitment must be balanced with Council's 'obligations to protect the public'.

I agree with the proposed disciplinary levy for dental hygienists of \$1.11 per practitioner. I believe the budgeted minimum disciplinary reserve balance of \$25,000 for dental hygienists is fair (taking into account one potential professional conduct committee) and welcome the fact our refund of \$5,611 in disciplinary levies reduces the cost for APC's of dental hygienists. I propose that it is time to look at cost being recovered by the DCNZ from the individuals involved in any such disciplinary matters, rather than the whole professional body.

I note the vast bulk of the proposed dental hygienists fee relates to the APC fee which is proposed at \$736.77 per practitioner. I welcome the detail in which Council have provided in how the APC levy for each profession has been calculated to provide the overall income required by Council. With respect to the profession of dental hygiene, I welcome Council's suggestion a reduction based on the reduced proportion of time spent servicing the dental hygiene profession (a drop from 11.8% to 7.2%) but question why the balance of the APC in operating reserves. I note it seems to have gone into deficit as a result of an under recovery in the 2017/2018 year due to a lower than forecasted number of dental hygienists registering following the creation and implementation of the oral health therapist scope of practice and profession. I find this reasoning disappointing as the Council had opted to change the scope and commence with a new profession thus they should have been able to amend the budget so this forecast was accurate before the departure of those Oral Health Therapists from the Dental Hygiene professional group. It saddens me that dental hygienists are being penalised for this error in judgement and planning on the part of the DCNZ.

I request a detailed analysis of the operating costs of the Council, which I believe would involve a degree of forensic accountancy, to see if any significant cost savings can be made. I note the Council's budget for a total 2019/2020 expenditure of \$3.3 million of which \$1.8 million is wages. Dental Hygiene is a limited number and will not likely grow much in the future as there are no hygienist training schools in NZ and all new registrations will be from overseas qualified persons.

I look forward to Council's response and subsequent outcome and welcome any feedback from Council.

Kind regards,

Jiljane Delaney

