

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.

I am objecting to the cost of the dental hygienist APC 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 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?

At this rate, our APC will increase 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. How can this be justified with our earnings and so many working part-time to raise families? Surely APC fees should reflect the scope of the practitioner?

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?

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 therefore 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 you will receive many responses against proposed increases, but I would hope our collective voice is not ignored.

With Regards,

Elizabeth Currie