

16 December 2020  
Dental Council of New Zealand  
109/125 Willis Street  
Te Aro, Wellington 6011

To whom it may concern,

On behalf of myself and John Penny Service Manager for Bee Healthy Regional Dental Service I would like to provide feedback on the following consultation:

**Proposed 2021/22 budget and fees, and policies on the allocation of costs for inquiries and competence remediation.**

1. **Costs for inquiries and competence reviews.** No feedback
2. **Competence remediation.**  
No feedback
3. **Do you wish to make any other comment on the Council's approach to costs for inquiries and competence remediation?**

As a DHB service provider employing approximately 60 Dental and Oral Health Therapists (19 Dental Therapists and over 40 Oral Health Therapists), it is important that all therapists who work solely for us are able to have their fees paid by a bulk funding arrangement not only this year but going forward for future years. The reasons why this is so important are:

- Many therapists, especially Dental Therapists, will struggle to find the money to pay the fees this year, even though will be reimbursed by the DHB. This reimbursement can take 2 – 3 weeks (depending on the timing of the pay runs) which can be very difficult for them with regard to cash flow. This requirement to pay a considerable amount of money up front, and the delay in reimbursement, causes considerable anxiety for some of our staff.
- There is considerable time and cost required to process reimbursements for 60 staff. Bulk funding is a far more efficient process and better use of limited DHB resources.

There is a risk that that under current policy there will one day be a single remaining individual with the dental therapy scope who will have to bear the fixed costs of that entire profession. DCNZ must urgently find a solution to the dwindling numbers of dental therapy scope clinicians having to bear the burden of fixed costs for their profession.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Kathryn Fuge".

Kathryn Fuge  
Clinical Director  
Bee Healthy Regional Dental Service