

16 December 2020

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Tēnā koe Marie

**Re: Consultation on proposed 2021/22 budget and fees, and policies on the allocation of costs for inquiries and competence remediation**

Thank you for the opportunity to comment on this detailed and transparent consultation document.

Firstly, it is good to see that the Council is doing what it can to minimise fee increases in a year where the COVID-19 pandemic has placed a significant burden on practitioners. It is also good to see the Council learning from the COVID-19 pandemic and being able to significantly reduce Council and committee costs, such as those saved by using videoconferencing facilities, as a result. The Council is also to be applauded for developing a plan to support the new function around respectful interaction with Māori.

One concern to note is that the application for registration fees for overseas practitioners with non-prescribed qualifications is increasing by \$2,200 (excluding GST). While I acknowledge that the Council follows a cost recovery model, these increases may prove to be a real obstacle to such applications, impacting on the workforce pipeline. Has the Council reviewed its process to see where costs might be reduced?

A further concern is the approximately 70 percent increase in Annual Practising Certificate fees for dental therapists. While I appreciate that the pool of therapists is decreasing and so there are less people to top up the reserve funds, it would have been good to increase fees gradually over time to lessen the impact. However, it is good to hear that you are looking at legislative steps to address this problem going forward.

Lastly, it seems fair that accreditation and monitoring fees for education institutions are introduced on a full cost-recovery basis for educational programmes that have an accreditation condition(s) placed on them, and that there is a CPI adjustment.

Please also find my responses to the consultation questions on page nine as follows.

**Consultation questions**

- 1. Costs for inquiries and competence reviews. Do you agree that all practitioners within a profession continue to meet the costs of inquiries and competence reviews into an individual practitioner?**

Agree.

AND

2. **Competence remediation. Do you agree that where an individual practitioner has undergone a Competence Review and the Council has found that the practitioner is not practising at the required standard of competence, the full costs associated with the practitioner undertaking the remedial action ordered by the Council should be met by the individual practitioner?**

Agree.

**AND**

3. **Do you wish to make any other comment on the Council's approach to costs for inquiries and competence remediation?**

No.

Once again, thank you for the opportunity to provide comments on the proposals.

Nāku noa, nā



Dr Riana Clarke  
**National Clinical Director, Oral Health  
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