



21 December 2020

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*Sent via email only*

## Submission on behalf of New Zealand Dental Association

- **Draft 2021 /22 budget,**
- **Annual Practising Certificate fee and disciplinary levies for oral health practitioners.**
- **Other fees,**
- **Costs for inquiries and competence remediation**

Thank you for providing us with the opportunity to comment and to ask questions regarding the above matters.

### **Draft 2021 /22 budget**

We have a few comments and questions regarding the consultation process and some regarding specific budget line items

#### **1. Timing of Consultation**

##### Comment:

The Council is setting dentist and dental specialist fees and levies nine months in advance and without providing any actuals for the current year. The current environment is subject to uncertainty and volatility and an 'early' (as well as Christmas) consult seems less than ideal.

It is our view that the consultation should be accompanied at least with real time actuals for the current year, and preferably should be occurring after March 31<sup>st</sup> end of financial year.

##### Question:

- 1.1 Could the Council review their process and move subsequent budget consultations to April of the year the fees and levies are to be charged?

#### **2. Cultural Competency Standard**

Comment: It is our understanding that over the last 4 years the Council has already budgeted, levied and collected from practitioners the budgeted sum of \$258,257 (\$42,743, \$48,897, \$99,069 and \$67,548) for this project. The Council has then diverted that budgeted funding to other priorities. The repetitive nature of this is very concerning. To repeatedly consult on a particular 'spend', levy for that purpose and then use the collected sum elsewhere is in our view, unreasonable. There appear to be either priority or planning issues that need to be addressed.

We are of the view that the development of a cultural competence standard should be a high priority for the Council.

Question:

- 2.1 Could the Council give us written confirmation that on this further occasion when they levy this money, it will be spent on the development of a cultural competence standard?

### 3. Salaries

Comment: The actual salaries spend to March 2020 was \$1,580,000 and the proposed budget for March 2022 is \$1,773,709. This is a 12% increase in budget expenditure over actual expenditure, across the two years.

Question:

- 3.1 Is this due to salary increases (average 6% per year) or additional staffing?
- 3.2 Have the wage and salary costs that were to reduce once the IT system (costly) was in place, materialised?

### 4. Strategic and organisational planning – projects

Question:

- 4.1 What are the projects and costings that have led to an increase from \$50,197 (2020 actual) to \$163,156 (2021/22 budgeted)?

## **Annual Practising Certificate fee and disciplinary levies**

### 5. Reserves – Dentist and Dental Specialist

Comment: Last year NZDA questioned the level of reserves the Council was holding to sustain the dentist and dental specialist professions which we considered to be too high. NZDA thanks the Council for now reducing that level of reserves.

### 6. Dental Therapists

Comment: With respect to the fees and levies for dental therapists, it appears the Council's current charging policy, in conjunction with the shrinking dental therapy workforce, is leading to a looming unsustainability regarding the fees and levies for dental therapists. At the time (near future) when there are only a few dental therapists left, surely they will not be expected to share between themselves, the cost distribution?

Question:

- 6.1 Has the Council considered absorbing the dental therapists into the OHT category sooner rather than later? If not,
- 6.2 When there are only a handful left how is Council anticipating funding regulation of that profession?

Comment: Perhaps we are misunderstanding the consultation document which describes Council accepting an invoice from a DHB of \$60,000 for unexpected charges due to extended supervision of a therapist. We have not heard of a similar occurrence within the private practice environment.

Questions:

- 6.3 Given the supervision was prescribed and known, why was the charge 'unexpected'?
- 6.4 Can other employers, say dental practices owned by a practitioner, or perhaps a corporate, charge Council costs of supervision of that practitioner? If not then,
- 6.5 Why can DHB's cost recover supervision costs but dental practices not cost recover supervision costs from the Council?

## **Costs for inquiries and competence remediation**

Comment: The NZDA supports the continuation of the current policies on the allocation of costs for inquiries and competence remediation.

Specifically, the Association agrees:

1. that all practitioners within a profession should continue to meet the costs of inquiries and competence reviews into an individual practitioner
2. where a 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

## **Fees**

Comment: During monitoring/ supervision and/ or investigation of practitioners, the Association encourages the Council to proactively reduce costs through the appropriate use of online meetings rather than onsite meetings wherever possible.



**David Crum ONZM**

**Chief Executive**

**New Zealand Dental Association**