



Marie Warner
Chief Executive Officer
Dental Council of New Zealand
PO Box 10-448
Wellington
17th November 2021
Tēnā koe Marie

Re: Dental Council's Budget & Fee/Levy Consultation 2022/2023

Ngā mihi nui ki a koe, thank you for taking the time to engage with our members in Palmerston North last week regarding the new recertification guidelines. It is always great to have a member of the DCNZ present to meet with our members to answer any question they may have. Thank you for also allowing us to comment on the Budget & Fee/Levy Consultation 2022/23. The NZDHA would like to have feedback on the information requested below. On the 2nd of November 2020 the 'Level of Reserves' policy was reviewed. We have previously asked for a summary of this policy review hui but did not receive a response. In order for us to gain a more broad understanding, we are requesting the minutes in relation to this review. We asked for this last year but did not seem to receive a response.

The NZDHA have ongoing concerns about the dental hygiene profession being able to afford the continual increases in the APC Fee which are increasing every year due to the profession always being in deficit because of the minimum level of reserves set by Council and the Audit Risk Management Committee (ARM). This has continued for the last 3 years even though we have declining numbers in our profession. It is our understanding that reserve levels are set by Council on the recommendation of the ARM Committee and then Council approve this policy.

We are asking Council and the ARM Committee to assess the dental hygiene profession level of reserves; specifically the operational reserve and disciplinary reserve levels.

To maintain appropriate operational reserves, Council and the ARM Committee adjust the APC Fees to meet operational activities and provide a buffer against an unknown number of competence cases. Anticipated cases are based on Council's assessment on the Professional Conduct Committee

(PCC) and Health Practitioners Disciplinary Tribunal (HPDT) case trends over the last 3 years.

The NZDHA would like to seek clarification on disciplinary levies that are set at the same reserve of \$27,000 across the dental hygiene, dental therapy and oral health therapy professions excluding the dental profession with differing numbers of practitioners in each profession.

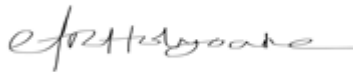
If the dental hygiene profession has a lower than forecasted volume of practitioners following the creation of the oral health therapist profession in 2017 (four years ago), then why can the operational and disciplinary levels not be based on these lower practitioner numbers? To date the dental hygiene profession has not had any PCC or HPDT cases in over 4 years.

It has since been disclosed that the amortisation of the quake damaged building was going to be spread over 5 years but has since been shortened to 2 years. The NZDHA would like to seek clarification on why this decision was made. We would like to also seek clarification on where this cost has been absorbed in relation to the dental hygiene profession APC costs?

We encourage Council to disclose its position on recovering costs associated with the design fault of the building that has been written off. Is there an insurance claim and what could that mean for practitioners currently holding an APC?

We look forward to your response after consulting with the ARM Committee.

Ngā mihi



Anna Holyoake
NZDHA President