



NZ Dental & Oral Health Therapists Association,
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24th November 2021

Re: Submission on behalf of the New Zealand Dental and Oral Health Therapists Association

- 1. The proposed 2022/23 budget**
- 2. The 2022/23 annual practising certificate (APC) fees and disciplinary levies excluding GST**
- 3. All other fees (registration, examination, competence, accreditation, and other miscellaneous fees) with a proposed CPI adjustment equivalent to 2.0%**

Thank you for providing us with the opportunity to provide feedback on the above matters.

1. The proposed 2022/23 budget

Advertising

The proposed forecast for Advertising is shown as \$1500 for the year 2022. However, no advertising expenditure was noted on the actual spending in 2021, nor is there any allowance for advertising expenditure proposed for 2023.

Question

What is the council advertising for that's only relevant for the year 2022?

Strategic and organisational planning.

The forecasted spending on strategic projects for 2021 was \$164,656, but the actual expenditure was only \$64,932. Likewise, the actual expenditure for the year 2020 was \$50,197. The forecast expenditure for the next two years for this same expense are \$163,156 (2022) and \$114,799(2023).

Question

What are these strategic and organisational planning and their projects that are allocated such high costings when their actual spending is less than 1/3 of the allocated amount? Would the council be a little more descriptive of the various projects that they are investing in?

Salaries

Forecasts for salary appears to be increasing by \$211,942 per year from 2021 to 2023.

Question

Has the council hired additional staff, or are the staff getting salary increases?

Staff welfare, training, ACC levies and recruitment

Forecast for the above expenditure is considerably low for the last four years (2020-2023), 2021 forecast for the same expense was \$83,953 while the actual spending was \$369,429, even 2020 actual expenditure was around \$300,000, yet the forecast for 2022 allocation is \$99,270, and for 2023, the allocation is \$130,254.

Question

If there has been considerable spending (over 300,000) in this sector for two consecutive years, shouldn't the council readjust the budget and increase the forecast expenditure amounts?

Pandemic and other costs

The council has disclosed that the legal expenses, among others, have increased the pandemic costs from actual spending of \$ 78,176 in 2021 to proposed spending of \$252,284 in 2023.

Question

How is the council able to justify this exponential increase in pandemic costs? The financial year ending 2021 showed spending of \$78,176, and that would have included the legal costs surrounding the pandemic as well as providing a framework to work out the future costs. Will the council please disclose to the association as to how they have calculated an increase of \$174,108 for the financial year 2023?

2. The 2022/23 annual practising certificate (APC) fees and disciplinary levies excluding GST

We are happy that the APC fees for the year 2022/2023 has been significantly reduced for dental hygienists, orthodontic auxiliaries, dental technicians, and clinical dental technicians, this will be accepted with a lot of relief from our fellow practitioners so a huge thank you for making this happen. We, however, are not happy that dental therapists still have to pay over \$1000 for their APC for the following APC cycle. While a reduction from \$1,786.07 to \$1,050.41 will be received with somewhat relief, it is still a long way away from being

standardised to the rest of the oral health community. We want to remind the council that neither the dental therapists' qualification nor their salary and nor the number of disciplinary issues is in any way comparable to that of a dentist or a dental specialist. The council themselves have disclosed that the pandemic costs have risen due to the level of inquiries from practitioners (particularly dentists and the Dental Association) during COVID-19. This will impact the increase in legal fees. Our question, therefore, is why are dental therapists then still paying only \$28.23 less than dentists and dental specialists as part of their APC? We as an association strongly advocate for the standardisation of APC fees across all oral health professions based on their salaries and qualifications rather than using the eligible number of practitioners as their price guide.

3. All other fees (registration, examination, competence, accreditation, and other miscellaneous fees) with a proposed CPI adjustment equivalent to 2.0%

The association agrees with the proposed CPI adjustment in all other fees. However, the examination fees seem to be unfairly distributed. The written and practical examinations fees are standardised across all disciplines of oral health except for dental specialists, which is a considerable \$ 15,000 more than what the dentists have to pay.

Considering the severe shortage of dental specialists in New Zealand, the council should rethink this decision as the high examination fees impact an increase in the quality dental specialist workforce that our country desperately needs.

We look forward to receiving your feedback after reviewing the submissions.

Kind Regards,

New Zealand Dental and Oral Health Association
NZDOHTA