

27 February 2020

Dear practitioner/stakeholder,

Outcome from 2020/21 proposed budget and fee consultation

Thank you for your feedback on the 2020/21 proposed budget and fee consultation.

We received nine submissions from a total of 5,067 practitioners and stakeholders. The submissions were considered by the Audit and Risk Management Committee on 29 January 2020 and by Council on 3 February 2020.

Budget and fees approved by Council take effect on 1 April 2020

Council agreed to reduce the APC fee proposed in [the consultation document](#) after considering feedback, revisiting the full year forecast, and considering the work planned and budgeted over the next two years. A reduction of \$59.68 per practitioner for the in-year APC fee has been made and is detailed in the table below.

All other fees have increased by 2% as set out in Appendix 2.

The 2020/21 fees were [published in the New Zealand Gazette](#) on 26 February 2020 and take effect from 1 April 2020.

The following table shows the approved APC fee and disciplinary levies payable for the 2020/21 year.

APC fee (excluding GST) by profession for 2020/21

Profession	Consulted in-year APC fee \$	Reduction in in-year APC Fee following consultation \$	In-year APC fee \$	Top-up/refund from previous year \$	Net APC fee payable \$
Dentists and dental specialists	874.43	(59.68)	814.75	(30.66)	784.09
Dental hygienists and orthodontic auxiliaries	736.78	(59.68)	677.1	60.02	737.12
Dental therapists	842.44	(59.68)	782.76	84.56	867.32
Dental technicians and clinical dental technicians	654.98	(59.68)	595.30	246.02	841.32
Oral health therapists	752.09	(59.68)	692.41	47.04	739.45

Disciplinary levy (excluding GST) by profession 2020/21

Profession	In-year disciplinary levy \$	Top-up/refund from previous year \$	Net disciplinary levy payable \$
Dentists and dental specialists	146.73	43.24	189.97
Dental hygienists and orthodontic auxiliaries	1.11	9.74	10.85
Dental therapists	(46.46)	83.64	37.18
Dental technicians and clinical dental technicians	73.95	(8.62)	65.33
Oral health therapists	(101.26)	82.05	(19.21)

APC fees for dental therapists

A key theme in the submissions received from dental therapists was that they considered the APC fee to be high. Several of these submitters noted the dental therapists are a smaller population and that the fee is much higher for them than for oral health therapists.

Due to the allocation methodology over a smaller number of practitioners in the profession, the increase in the APC fee for dental therapists from last year is \$24.88 as shown in the table below.

Proposed APC fee and disciplinary levy for dental therapists	2018/19	2019/20	2020/21	Change 2020/21 from 2019/20
	Actual	Actual	Approved	
APC fee	537.54	524.78	787.12	262.34
Capital replacement reserve	84.71	84.10	25.91	(58.19)
Minimum reserve top-up / (refund)	82.35	233.56	54.29	(179.27)
Total APC fee	704.60	842.44	867.32	24.88
Disciplinary levy	7.35	12.88	18.50	5.62
Minimum reserve top-up / (refund)	82.72	(59.34)	18.68	78.02
Total disciplinary levy	90.07	(46.46)	37.18	83.64
Total APC fee and disciplinary levy excl GST	794.67	795.98	904.50	108.52
GST	119.20	119.40	135.68	16.28
Total APC fee and disciplinary levy incl GST	913.87	915.38	1,040.18	124.80

Combining of dental therapists and oral health therapists

Another key theme in the responses was the suggestion that the dental therapist and oral health therapist professions be combined.

As both dental therapist and oral health therapists are named as independent professions within the Health Practitioners Competence Assurance Act 2003 (the Act), Council cannot currently merge them into a single profession.

At this stage, the Office of the Auditor General has determined that cross subsidisation across the independent professions in the Act is not permitted, therefore this is not currently possible.

Other themes from submissions

A table summarising the other main themes from the submissions is attached as Appendix 1.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Marie Warner', with a small flourish at the end.

Marie Warner
Chief Executive

Appendix 1: Submission themes and responses

Feedback (and Council's responses) from the submissions to consultation on 2020/21 proposed budget and fees

Theme	Council response
How does a smaller population affect the fee charged?	<p>Council have taken this into account when determining the APC for the 2020/21 budget and consulted on a revised cost allocation methodology.</p> <p>The level of APC fee per practitioner depends on:</p> <ul style="list-style-type: none"> • the budgeted number of practitioners • direct profession income and expenditure budgets; and • minimum reserve levels set for each profession. <p>As a result of this analysis, Council have proposed to allocate net Council expenditure based on the number of practitioners who hold an APC.</p>
Can the dental therapist and oral health therapist professions be combined?	<p>To combine these professions, Council would be required to cross subsidise one profession with another.</p> <p>The Office of the Auditor General has determined that cross subsidisation is not permitted, therefore this is not possible.</p>
Can training / incentive services be made available, so practitioners don't feel isolated?	<p>This feedback has been passed onto the recertification project.</p>
NZIDT raised questions about the number of practitioners, the disciplinary levy and the calculation of the APC fee.	<p>The Chief Executive responded directly to NZIDT's request for information.</p>
What is the breakdown of personnel related costs?	<p>A response was sent directly to the single respondent who requested this information.</p>

Appendix 2

Other fees (excluding GST)

Fee	Proposed fee \$
Retention fee	116.91
Application fee to transfer from non-practising to practising status, where application is subject to Council's recency of practice policy	296.47
Application for registration fee	494.11
Application for registration for overseas applicant with prescribed qualifications and experience	1,235.30
Application for registration for applicant with non-prescribed qualifications and experience to be registered under section 15(2) of the Act for dentists, hygienists, therapists, clinical dental technicians, dental technicians, orthodontic auxiliaries	3,728.63
Application for registration for applicant with non-prescribed specialist qualifications and experience to be registered under section 15(2) of the Act for dental specialists	4,753.92
Resubmission of application for assessment of non-prescribed qualifications and experience to be registered under section 15(2) of the Act	2,902.28
Application for removal of an exclusion(s) on the scope of practice after completion of a Dental Council approved course for hygienists, therapists and orthodontic auxiliaries	271.75
Application for removal of an exclusion(s) on the scope of practice after completion of a course not approved by the Dental Council for hygienists, therapists and orthodontic auxiliaries	494.11
Application for registration with a prescribed qualification in an additional scope of practice for therapists and clinical dental technicians	494.11
Application for registration with a non-prescribed qualification in an additional scope of practice for therapists and clinical dental technicians	763.93
Application to undertake supervised activities for orthodontic auxiliaries while undertaking an approved training course.	98.81
The New Zealand Dental Hygiene Registration Examination	
NZDHREX - written examination where there is less than a total of 5 candidates sitting the same examination	3,322.97
NZDHREX - written examination where there is a total of 5 or more candidates sitting the same examination	2,727.31
NZDHREX - clinical examination where there is less than a total of 5 candidates sitting the same examination)	5,143.26
NZDHREX - clinical examination where there is a total of 5 or more candidates sitting the same examination	4,595.36
The New Zealand Dental Therapy Registration Examination	
NZDTREX - written examination where there is less than a total of 5 candidates sitting the same examination	3,322.97
NZDTREX - written examination where there is a total of 5 or more candidates sitting the same examination	2,727.31
NZDTREX - clinical examination where there is less than a total of 5 candidates sitting the same examination	5,143.26
NZDTREX - clinical examination where there is a total of 5 or more candidates sitting the same examination	4,595.36
The New Zealand Oral Health Therapy Registration Examination	
NZDOHTREX - written examination where there is less than a total of 5 candidates sitting the same examination	3,322.97

Fee	Proposed fee \$
NZDOHTREX - written examination where there is a total of 5 or more candidates sitting the same examination	2,727.31
NZDOHTREX - clinical examination where there is less than a total of 5 candidates sitting the same examination	5,143.26
NZDOHTREX - clinical examination where there is a total of 5 or more candidates sitting the same examination	4,595.36
The New Zealand Dental Technology Registration Examination	
NZDTechREX - Combined Examination where there is less than a total of 5 candidates sitting the same examination	4,108.48
NZDTechREX - Combined Examination where there is a total of 5 or more candidates sitting the same examination	3,462.78
The New Zealand Dental Specialist Registration Examinations	
New Zealand Dental Specialist Registration Examination	19,395.84
Professional standards programme fees ^{1,2,3}	
Supervision ^{1,2,3} (12-month programme)	6,363.31
Oversight ^{1,2,3} (12-month programme)	4,129.17
Competence/Recertification Programme: ^{1,2,3}	
Distance learning - per module	3,198.28
Clinical training - per practice area of training	5,473.55
Health programme fees ^{1,2,3}	
Drug and alcohol screening programme, set up and administration ^{1,2,3}	
Set-up and administration for the first 12 months	904.40
Administration fee for each 12-month period thereafter	452.19
Third party testing - fee per test	129.90
¹ Fee will be adjusted for any specific requirements of the individual programme and 3rd party costings at the time the programme is established.	
² The practitioner will be charged direct professional fees and travel and accommodation expenses for supervisors, those providing oversight, tutors, course administrators etc. These expenses will be charged on an actual and reasonable basis in accordance with the Dental Council's fees and payments and expenditure decisions and probity policies. Course materials, venue costs and administration expenses such as printing and postage will also be charged based on actual costs.	
³ The practitioner will be charged for secretariat administrative overheads at \$63.70 an hour.	
Education fees	
Application for "removal of exclusion" course approval by providers <u>who do provide training</u> as part of a primary Dental Council accredited qualification	1,879.98
Application for "removal of exclusion" course approval by providers <u>who do not provide training</u> as part of a primary Dental Council accredited qualification	4,073.35
Application for approval of courses to equip registered oral health practitioners for registration in an additional scope of practice for course providers who do provide training as part of a primary Dental Council accredited qualification	3,655.28

Fee	Proposed fee \$
Application for approval of courses to equip registered oral health practitioners for registration in an additional scope of practice for course providers who do not provide training as part of a primary Dental Council accredited qualification	6,400.26
Other fees	
Administration fee	41.52
Application for additional registration advice	494.11
Application for restoration to the Register	494.11
Secretariat overhead administration fee	63.70
Supply of certificate of good standing	98.81
Supply of replacement registration certificate or any other certificate	98.81
Supply of electronic copy of Register	216.49