

Canterbury

District Health Board

Te Poari Hauora o Waitaha

Office of the Executive Director of Allied Health,

Scientific & Technical

Corporate Office, Level 1 32 Oxford Terrace

PO Box 1600, Christchurch 8140, New Zealand

Dental Council
PO Box 10-448
Wellington 6143

Via email: consultations@dcnz.org.nz

21 December 2020

Dear Marie,

I am writing to you on behalf of the National Directors of Allied Health.

We have been made aware of the recent Consultation on the Dental Council's proposal that has been circulated. Included in the proposal is an increase Annual Practising Certificate costs for Dental Therapists from \$904 to \$1,687 for next year.

You will be aware that Dental Therapists sit within the portfolio of Allied Health and they make up a significant number of our workforce. The National Directors of Allied Health were not consulted prior to this proposal being circulated and we have some concerns with the proposal.

We are concerned that this is a significant change in costs to Dental Therapists who will be required to pay for their new Annual Practising Certificate before seeking reimbursement from their employer. This also has significant effect on DHBs, whom are required under Multi-Employer Collective Agreements to reimburse the full cost of Dental Therapist's Annual Practising Certificate (unless members are employed by other employers in which case DHBs are required to reimburse a portion of this cost.)

For Canterbury District Health Board alone, this equates to an **additional \$23,490** in Annual Practising Certificate fees in the current financial year. Even with the proposed \$111 decrease in Annual Practising Certificate for Oral Health practitioners, due to the ratio of Dental Therapists to Oral Health Therapists in DHBs currently, this still results in approximately \$20,000 additional spend for Canterbury District Health Board. This increase in fees appears excessive, particularly during a time of national fiscal restraint alongside a significant increase in operating costs for DHB dental services relating to additional PPE requirements etc.

We would value a discussion regarding this.

Noho ora mai,



Dr Jacqui Lunday Johnstone OBE

Executive Director of Allied Health, Scientific and Technical
Canterbury and West Coast District Health Boards