

26 May 2016

Marie Warner
Chief Executive Officer
Dental Council
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Wellington

Dear Marie

Comments on a proposed Oral Health Therapy Scope of Practice

I wish to support the NZDA's response to this proposal. I have not changed my views from my earlier response.

Some other comments:

1. I am not convinced that there is a need for the Council to create this new profession. I feel that there is a definite need for both of these separate dental professionals, to enable graduates who wish to or are only able to practice in either field. Many people enjoy working as hygienists and would not have undertaken a longer and more expensive training programme when they only wish to utilise the hygiene skills.
2. I do agree that restorative procedures should be restricted to people under 18 years of age
3. I have reservations about a lack of a written and signed agreement with a dentist. I still feel that dental therapists and hygienists do not have sufficient knowledge and training to be able to practice safely and adequately without having a professional relationship with a dentist/dental specialist (i.e. a signed professional agreement). This provides reassurance to the patient. The dentist/dental specialist must be onsite and available at all times for assistance and advice in treatment planning and treatment implementation.
4. I agree with Q3.
5. Orthodontic activities should be under the direct clinical supervision of a dentist/orthodontist who is currently registered to practice in New Zealand.
6. Therapists do not have sufficient knowledge and training to "take and interpret all intra- and any extra-oral radiographs. Extra-oral radiographs include OPGs, lateral cephalometric radiographs and even CBCTs. Their limited knowledge in anatomy, physics, radiology, pathology, orthodontics, dental development etc, make it impossible for them to "interpret" extra-oral radiographs. Some intra-oral radiographs such as occlusals and some periapicals are also beyond their training and knowledge. Indeed, identifying the pathology and unusual anatomy sometimes seen within the peripheries of bitewing and PA radiographs is beyond their ability.

Yours sincerely



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