

19 May 2016

Marie Warner  
Chief Executive  
Dental Council of New Zealand  
PO Box 10-448  
WELLINGTON 6143



Dear Marie

**Re: Follow-up Consultation on a proposed Oral Health Therapy Scope of Practice**

Thank you for the invitation to comment on the *Follow-up Consultation on a Proposed Oral Health Therapy Scope of Practice*, issued by the Dental Council of New Zealand (the Dental Council) on 31 March 2016. I have discussed the consultation document with Health Workforce New Zealand for this response. We wish to acknowledge the extensive work of the submissions committee and the Dental Council regarding the proposal and your consideration of our submission in the previous consultation.

**Changes to the Oral Health Therapy Scope of Practice**

We are in general agreement with the Dental Council's proposal to develop an Oral Health Therapy Scope of Practice and the proposed name of the scope being the Oral Health Therapy Scope of Practice. We note the proposed name reflects the training of oral health therapy graduates. The title Oral Health Therapist is also consistent with the combined scope and designation of registered practitioners in Australia and Singapore. We understand that the Dental Council intends to correspond with the Ministry of Health regarding the designation of a new profession, Oral Health Therapy, under the Health Practitioners Competence Assurance Act 2003 (HPCA Act).

As outlined in our previous submission, we are also supportive of oral health practitioners being enabled to practise to the fullness of their scope of practice, as with other health practitioners. We are also mindful of the development of the oral health workforce and its potential to contribute to the needs of the population.

We have several comments for consideration by the Dental Council.

**Patient age limit for dental therapy activities**

We recognise a long history of dental therapists providing safe care to children, and in a limited number, for dental therapists with an adult scope of practice, to adults.

Our previous submission noted that at that stage we did not agree with extending dental therapy activities to persons 18 years and over. We note that the Dental Council has taken account of the concerns raised in the submissions, and proposes to limit diagnosis of dental caries and the provision of restorative treatment to patients up to age 18 years.

### **Consultative professional relationship**

While recognising that the duty of care rests with the individual practitioner, there is some concern about the lack of a requirement to have a written agreement with a dentist or dental specialist to formalise the support that an oral health therapist may require. Not having a formal written agreement may undermine the importance of such a professional arrangement. We would welcome further discussion around this issue when we meet to discuss the arrangement for registration in the new scope of practice.

We agree with the proposal to remove direct clinical supervision, as practitioners should work within their level of confidence and within the scope of practice in which they are registered by the Dental Council.

### **Orthodontic activities, Orthodontic Auxiliary Scope and Proposed Competency Standards**

We have no comment on these proposals.

### **The proposed registration transition for Oral Health Therapy Scope of Practice**

Rather than comment on the proposed registration transition, it would be useful to meet and discuss the new arrangements and timeframes for the introduction of registration in the oral health therapy scope, as well as some of the feedback outlined in this letter. Please contact me using the contact details below to arrange a suitable time to discuss. I will also invite Health Workforce New Zealand and Health Legal to this meeting.

As mentioned in our previous submission, a Medicines Regulations 1984 amendment would be required to allow oral health therapists to access medicines currently exempted for dental therapists.

Thank you once again for the opportunity to comment.

Yours sincerely



**Dr Riana Clarke**  
**National Clinical Director, Oral Health**  
**Service Commissioning**

