



28 November 2021

Re: Consultation on proposed risk management principles for oral health during COVID-19 pandemic
Submission to Dental Council on behalf of the New Zealand Association of Orthodontists

Thank-you for the opportunity to comment on the proposed additions to the Council's Infection prevention and control practice Standard.

The NZAO Executive has identified four particular areas of concern with the proposals.

1. Protective clothing requirement. The justification/evidence for replacement of a protective over-garment, typically in the form of a plastic apron, for every patient including those deemed low risk appears to be deficient. This requirement also presents several problems such as cost, availability of supply, and significant environmental impact.
2. Stand-down times. It would be beneficial to clarify the wording with regard to stand down periods. Pages 4/5 refer to the stand down period starting after a patient leaves the room, whereas the table in Figure 3 on page 8 refers to stand down starting from the time the instrument is last used. This may cause some confusion.
3. Management of patients under the age of 12. This problematic group, with its current inability to receive the vaccine, presents some inconsistencies. Many of the NZAO membership are grateful for the accommodation of multi-chair clinics, but if a patient in this category can be seen in a multi-chair clinic without a stand-down period, why is a stand-down period required when the same patient is seen in a single chair room?

NZAO appreciates the challenges in formulating policy to enable care to continue as safely as possible for this group. Could a more consistent approach be achieved by instead placing a temporary restriction on the circumstances under which this group may receive treatment? Hopefully this could be discontinued in the very near future and replaced by a requirement for a negative Rapid Antigen Test result on arrival (in addition to all existing screening methods), for both patient and caregiver?

4. Ventilation. We have had requests from members that Council provide specific details at their earliest opportunity of the minimum ventilation requirements that are likely to be required for orthodontic practices. If minimum standards are to be implemented practices will require as much notice as possible to achieve the required changes.

PETER DYSART
President NZAO

(Electronically sighted and approved)