

21 March 2011

Dear Stakeholder,

**Consultation on Proposed Changes to the Scope of Adult Care in Dental Therapy Practice**

The Dental Council is now consulting on a proposal for the existing scope of Adult Care in Dental Therapy practice to be amended to allow practitioners to practise under either *direct clinical supervision* or *clinical guidance*, depending on the practitioner's qualifications.

A consultation document is attached for your information. The objective of the consultation is to gather views from the sector in order for Council to make a final decision on the proposal.

The Dental Council therefore seeks any comments on the proposal by the close of business on Monday **16 May 2011**.

In accordance with section 14 of the Health Practitioners Competence Assurance Act 2003, this letter and the attached consultation document have been sent to all dentists, dental therapists, relevant associations and societies, the Ministry of Health, District Health Boards and other organisations with an interest in this area. They will also be published on the Council's website, with a similar invitation to comment.

Responses should be sent to:

Dental Council  
PO Box 10-448  
Wellington 6043

Fax: 04 499 1668

Email: [marie.warner@dcnz.org.nz](mailto:marie.warner@dcnz.org.nz)

I look forward to receiving your submission.

Yours sincerely



Marie Warner  
Chief Executive

# Consultation Document

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## Proposed changes to the Scope of Practice of Adult Care in Dental Therapy

RELEASED 21 MARCH 2011

SUBMISSIONS DUE 16 MAY 2011

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### Introduction

The Dental Council is seeking submissions on the current Adult Care in Dental Therapy Scope of Practice, which currently allows provision of care under *clinical guidance*<sup>1</sup>, to be amended to contain provision for practitioners to practice under either *direct clinical supervision*<sup>2</sup> or *clinical guidance*.

### The current scope of practice

The current scope of Adult Care in Dental Therapy practice is described as:

Providing care to adult patients within the general dental therapy scope of practice (and/or any additional scope) in a team situation with *clinical guidance* provided by a practising dentist/s.

It is important to note that the scope of practice as it is currently gazetted requires the practitioner to work under *clinical guidance*.

Whilst a number of practitioners are registered in the scope of Adult Care in Dental Therapy practice, there are currently no Dental Council accredited qualifications for the scope.

### Background

In 2010 New Zealand Defence Force (NZDF) approached Council with a view to obtaining accreditation for a proposed new course of study that it had commissioned to permit NZDF Dental Therapists who had successfully completed that course, to practise in the scope of Adult Care in Dental Therapy.

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<sup>1</sup> **Clinical guidance** means the professional support and assistance provided to a dental therapist by a practising dentist or dental specialist as part of the provision of overall integrated care to the adult patient group. Dental therapists and dentists/specialists normally work from the same premises providing a team approach. Clinical guidance may be provided at a distance but appropriate access must be available to ensure that the dentist or specialist is able to provide guidance and advice, when required and maintain general oversight of the clinical care outcomes of the adult patient group.

<sup>2</sup> **Direct clinical supervision** means the clinical supervision provided to a dental hygienist or therapists by a practising dentist or dental specialist when the dentist is present on the premises at the time the dental hygiene work is carried out.

It was NZDF's proposal that those of its therapists who completed the proposed new course of study would be able to practise in the existing scope, but subject to *direct clinical supervision* rather than *clinical guidance*, as is currently mandated.

For a proposed qualification to be accredited, it must first be successfully benchmarked against a scope of practice. A proposed qualification requiring a different level of practitioner supervision or guidance from that of the existing scope cannot appropriately be measured against it, nor accredited to it. Accordingly, either a new scope to co-exist with the existing scope or an amended scope of practice would be required to accommodate a level of practitioner supervision that differed from the currently accepted level.

Council considers that the *clinical guidance* requirement of the existing scope may be restrictive to course development. The training of practitioners and delivery of safe oral health care could equally be accomplished with less intense and detailed training but subject to a requirement of *direct clinical supervision*. Council sought legal opinion and after consideration of the advice received, agreed the most appropriate pathway was to maintain a single scope of practice for Adult Dental Therapy Practice, but to provide in the scope for both *clinical guidance* or *direct clinical supervision* by describing the scope in a way that included both categories. Council could then, when prescribing the qualifications for the scope, link specific qualifications to a category i.e. to the provision of adult dental therapy under *clinical guidance*, or to the provision of adult dental therapy under *direct clinical supervision*. Legal advice also ruled out restricting the availability of a scope of practice to a single employer or to restricted group of practitioners.

If this proposal on the draft Adult Care Scope of Practice is accepted; the normal accreditation review process of the proposed qualification programme will follow. If Council then proposes that this qualification programme be granted accreditation as a prescribed qualification for the Adult Care Scope of Practice normal consultation will follow.

The wording of the proposed scope of Adult Care in Dental Therapy practice is as follows:

***Proposed Scope for Adult Care in Dental Therapy Practice***

*Providing care to adult patients within the general dental therapy scope of practice in a team situation under direct clinical supervision<sup>3</sup> or clinical guidance<sup>4</sup>, dependant on the prescribed qualification, provided by a practising dentist/s or dental specialists.*

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<sup>3</sup> **Direct clinical supervision** means the clinical supervision provided to a dental hygienist or therapists by a practising dentist or dental specialist when the dentist is present on the premises at the time the dental hygiene work is carried out.

<sup>4</sup> **Clinical guidance** means the professional support and assistance provided to a dental therapist by a practising dentist or dental specialist as part of the provision of overall integrated care to the adult patient group. Dental therapists and dentists/specialists normally work from the same premises providing a team approach. Clinical guidance may be provided at a distance but appropriate access must be available to ensure that the dentist or specialist is able to provide guidance and advice, when required and maintain general oversight of the clinical care outcomes of the adult patient group.

## **Consultation**

The Dental Council is now consulting on the proposal for the existing scope of Adult Care in Dental Therapy practice to be amended to contain provision for practitioners to practise under either *direct clinical supervision* or *clinical guidance*, depending on the practitioner's qualifications.

The Dental Council seeks any comments on the proposal by the close of business on **Monday 16 May 2011**.

In accordance with section 14 of the Health Practitioners Competence Assurance Act 2003, this consultation document and the attached letter have been sent to all dentists, dental therapists, relevant associations and societies, the Ministry of Health, District Health Boards and other organisations with an interest in this area. This consultation document and the attached letter will also be published on the Council's website, with a similar invitation to comment.

The objective of the consultation is to gather views from the sector in order for Council to make a final decision on the proposal.

## **Consultation points**

The Council invites all stakeholders to comment on this consultation document by responding to the following questions:

1. Do you agree/disagree with the proposal to amend the Adult Care in Dental Therapy scope of practice to contain provisions for *direct clinical supervision* or *clinical guidance* with specific qualifications attached to the different provisions?
2. Do you agree with the wording of the proposed amendment to the scope?
3. Do you agree that the changes will not compromise public safety?
4. Any general comments related to this proposal.

## **Address for responses**

Responses should be sent to:

Dental Council  
PO Box 10-448  
Wellington 6043

Fax: 04 499 1668

Email: [marie.warner@dcnz.org.nz](mailto:marie.warner@dcnz.org.nz)

**to arrive no later than the close of business on Monday 16 May 2011**