



25 May 2106

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

Dear Ms Warner

Proposed Oral Health Therapy Scope of Practice

Thank you for the opportunity for the NZAO to provide written comment on the proposed oral health therapy scope of practice. Our comments are attached to this email.

Yours sincerely

Dr Alan Isaac
President
NZ Association of Orthodontists

New Zealand Association of Orthodontists' submission to the Dental Council of New Zealand re Proposed Oral Health Therapy Scope of Practice

Thank you for the opportunity for the New Zealand Association of Orthodontists (NZAO) to comment on the proposed oral health therapy scope of practice.

The following comments relate to the points that are relevant to NZAO.

Comment 1:

2.5 Supervision levels for the proposed Oral Health Therapy Scope of Practice

-Concern was raised regarding the apparent anomaly of requiring orthodontic procedures to be carried out under direct clinical supervision, while more invasive techniques were proposed on adults, autonomously.

NZAO comment. NZAO supports the requirement that orthodontic procedures be carried out under direct clinical supervision. The proposed Oral Health Therapy Scope of Practice does include competence in a number of orthodontic procedures that assist the Dentist/Orthodontist but the scope does not include the theory behind the procedures which the Oral Health Therapist is able to perform – in very simple words the “Oral Health Therapist” is able to perform the procedures under direct supervision but does not have the knowledge and training in their scope to understand the objectives and mechanics of treatment and to recognize when problems are developing. Consequently direct clinical supervision is required at all times for orthodontic procedures.

Comment 2.

Q 3 Do you agree that the following orthodontic activities from the oral health therapy scope of practice be moved from direct clinical supervision to being performed within the consultative professional relationship:

- tracing cephalometric radiographs
- fabricating retainers and undertaking simple laboratory procedures of an orthodontic nature?

NZAO comment. Yes agree.

Comment 3.

P7 All oral health practitioners have the same requirement to remain competent in their registered scope(s) of practice, and the creation of an oral health therapy scope of practice would not prevent or limit these practitioners to maintain competence across all scope activities. The potential risk of a practitioner not maintaining competence across the full scope of practice was not significantly higher than other health practitioners.

P8 An oral health graduate registered in the oral health therapy scope of practice does not need to additionally register in the orthodontic auxiliary scope of practice. The two oral health programmes would be end dated as prescribed qualifications for the orthodontic auxiliary scope of practice, similar to the dental hygiene and dental therapy scopes of practice. Oral health graduates that register as an oral health therapist will be removed from the orthodontic auxiliary scope of practice, if registered as an orthodontic auxiliary.

Q4 Do you agree with the proposal to end-date the two oral health programmes as

prescribed qualifications for the orthodontic auxiliary scope of practice? Consequently oral health graduates that register, as an oral health therapist will be removed from the orthodontic auxiliary scope of practice- if registered in the orthodontic auxiliary scope of practice. If you do not agree with the proposal please explain.

NZAO comment. Yes agree.

Comment 4

Q6 Do you agree with the proposed registration transition for oral health graduates? If not, please explain.

NZAO comment. Yes agree but would like to see the Oral Health Therapist's APC issued with a condition not to perform orthodontic activities if the applicant is not able to demonstrate that they are competent in the orthodontic activities listed in the proposed scope of practice. Demonstration of competence should involve a minimum amount of clinical orthodontics over the past 12 months to show currency as well as some orthodontics in their previous CPD points.

Comment 5

P1 Based on the balance of information provided by the oral health programmes, it is proposed that restorative activities on patients 18 years and over under prescription of a dentist, be removed from the proposed oral health therapy scope of practice.

NZAO comment. NZAO supports this position.

Comment 6

NZAO endorses the comments made by NZDA about the proposed oral health therapy scope of practice.