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**From:**  
**Sent:** Thursday, 12 May 2016 11:14 a.m.  
**To:** Consultations  
**Subject:** Oral Health Therapy scope of practice

Dear Sir/Madam

Re: Oral Health Therapy scope of practice.

1. Do you agree with the proposed changes to the oral health therapy scope of practice? If not, please explain.

No.

Main reasons:

- a- Full treatment planning is very important rather than isolated (one filling/one thing) approaches.
- b- The quality of restorative work will deteriorate leading to many re-dos and problems including the need for more endodontic treatments and extractions. Most oral health therapists do not have the appropriate knowledge and experience to perform the required restorative work on adults.
- c- Many practice owners will use the new oral health therapists for fast financial gains (cheap dentistry).
- d- Most patients are already confused about the difference between all the new emerging dental professions. I do not think we need another one.

2. Do you agree with the proposed consultative professional relationship between an oral health therapist and one, or more, dentists/dental specialists, without the need for a signed agreement? If not, please explain.

No. Signed agreement is required.

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? a. tracing cephalometric radiographs b. fabricating retainers and undertaking simple laboratory procedures of an orthodontic nature If not, please explain.

Yes.

4. 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.

Yes.

5. Do you agree with the proposed competency standards for oral health therapists? If not, please explain.

Yes but written agreements are needed.

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

No.

Most therapy/hygiene graduates practise as dental hygienists or dental therapists (not both). Getting those practitioners to practise everything at once with no appropriate training will put the NZ public at risk.

Lastly, I really support the New Zealand Dental Association proposal/response.

**Kind Regards**

**Dr Ali Baker**  
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Dental Surgeon