

Page 2: Information about the person or organisation completing this submission

Q1 This submission was completed by:

Name **Leslie**

Q2 Are you making this submission **as a registered practitioner**

Q3 Please tell us which part of the sector your submission represents **a registered dentist or dental specialist**

Page 3: Area one: new core recertification programme

Q4 What, if anything, do you like about our proposed core recertification programme? **Respondent skipped this question**

Phase two consultation on recertification

Q5 Is there anything about our proposed core recertification programme you would change?

Yes,

Please explain.:

Eye examination for over 40 year old practitioners every 2 years. I consider that the New Zealand Association of Optometrists has a conflict of interest in providing the advice which created this proposal. Their members will most certainly benefit financially from the increased number of vision assessments that will be required by this proposal. Also consider those practitioners who may already have a visual impairment but are under the age of 40. They will not be covered by this proposal until they reach the arbitrary age of 40. Perhaps the Dental Council be seeking the advice of an independent body eg Ophthalmologists on whether this proposal is founded in good evidence-based science. Can the Dental Council give examples of other similar professions or Dental jurisdictions that have this proposal as part of their recertification requirements? Who gets to determine whether "Practitioners whose vision is not adequate to perform the tasks associated with their scopes of practice..." Any visual acuity test would have to define what is and is not acceptable with respect to performing tasks and the arbitrary cut-off point must surely be scientifically proven in order to provide any degree of legitimacy to this proposal. Also is the visual acuity requirement going to cover a very wide range of tasks in the practitioners scope ie everything from locating very fine sclerosed Endodontic canals to taking a dental impression? These require very different levels of visual acuity but will the practitioner be measured against the most demanding standard? This proposal is also prescriptive and adds additional regulatory costs (which the optometrists are the primary beneficiaries) and does not allow the practitioner to use their own professional judgement as to whether they need to address this issue.

Q6 Do you support our proposal to change the recertification cycle to 12 months?

No,

Please explain.:

Some practitioners may take time off during the annual cycle for varying reasons but have ample opportunity to catch up on their recertification requirements under the current scheme. I do not believe that shortening the cycle to 12 months will provide any more reassurance to the public but rather add additional burden and cost to the current process.

Phase two consultation on recertification

Q7 Do you think our proposed core recertification programme should include a requirement for practitioners to complete an online open-book assessment of their technical and clinical knowledge and skills?

No,
Please explain.:
This does not necessarily prove competency and so how can the public have more confidence in practitioners just because they passed a test? It does not prove that a practitioner is continually using "good judgement" on a daily basis and the answers provided may not reflect their daily practice.

Q8 If a proposal about an online open-book assessment of a practitioner's technical and clinical skills and knowledge is supported, how often should practitioners be required to complete an assessment?

Every four years

Q9 Do you have other proposals about our proposed core recertification programme you would like us to consider? Please explain.

Respondent skipped this question

Page 4: Area two: support for new registrants

Q10 What, if anything, do you like about our draft proposals for supporting new registrants?

Respondent skipped this question

Q11 Is there anything about the draft proposals for supporting new registrants you would change?

Yes,
Please explain.:
New registrants from overseas need more support but this should not be mandated. That may be construed as highly insulting to those highly trained and competent new registrants.

Q12 Do you think the proposed two year minimum period for the mentoring relationship is:

too long

Q13 Do you think all new registrants should participate in a mentoring programme, or are there some new registrants who should not be required to participate in a mentoring programme?

No,
Please explain.:
New registrants from overseas should be offered mentoring but it shouldn't be compulsory

Q14 Do you have other proposals about supporting new registrants you would like us to consider? Please explain.

Respondent skipped this question

Page 5: Area three: addressing health-related competence decline concerns

Phase two consultation on recertification

Q15 What, if anything, do you like about our draft proposals for addressing health-related competence decline concerns?

see previous answers re vision assessment

Q16 Is there anything about the draft proposals for addressing health-related competence decline concerns you would change?

Yes,
Please explain.:
remove mandated requirement for vision testing

Q17 Do you have other proposals for addressing health-related competence decline concerns you would like us to consider? Please explain.

Respondent skipped this question

Page 6: Area four: addressing recurring non-compliant practitioner behaviours

Q18 What, if anything, do you like about our draft proposals for addressing recurring non-compliant practitioner behaviours?

Respondent skipped this question

Q19 Is there anything about the draft proposals for addressing recurring non-compliant practitioner behaviours you would change?

Respondent skipped this question

Q20 Do you have other proposals for addressing recurring non-compliant practitioner behaviours you would like us to consider? Please explain.

Respondent skipped this question

Page 7: Final thoughts and comments

Q21 Do you have any other comments, suggestions or information you want to share with us about the draft proposals for improving our approach to recertification?

Respondent skipped this question
