



Consultations  
Dental Council of New Zealand  
PO Box 10-448  
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12 December 2019

Dear Council Members

**Consultation on proposed changes to scopes of practice and prescribed qualifications**

The New Zealand Association of Orthodontists (NZAIO) wishes to present a submission on the proposed “**Changes to scopes of practice and prescribed qualifications**” as they relate to the scope of practice for orthodontic specialists.

The NZAIO is the largest group of dental specialists in New Zealand with 102 full members (orthodontic specialists). All members of NZAIO are also members of the New Zealand Dental Association (NZDA), and with very few exceptions all orthodontists in New Zealand are members of NZAIO.

The NZAIO welcomes this timely initial review of the scopes of practice and prescribed qualifications and recognizes that there is more work required to the proposed changes.

**The NZAIO wishes to comment on the following proposed changes to the scope of practice for orthodontic specialists:**

The proposed alternative or other pathway is “**two** years or more of full-time equivalent postgraduate training in the specialty, evidence of research activity and a pass in the New Zealand Orthodontic Specialist Examination”.

The wording “at a recognised tertiary academic institution or equivalent” has been removed from the other pathway.

**1. NZAO comment:**

- a. The New Zealand and the Australian qualifications for the scope of practice for orthodontic specialists both involve **three** years of full-time equivalent postgraduate training in the specialty.

We would suggest that the time frame for training at other institutions should be the same or equivalent. Therefore, we recommend that the wording change from “**two** years or more of full-time equivalent postgraduate training in the specialty” to

**“THREE years or more of full-time equivalent postgraduate training in the specialty”.**

The regulations for the Degree of Doctor of Clinical Dentistry (DClinDent) at Otago University (the New Zealand qualification for the specialty of orthodontics) include “the research should be of a kind which a diligent and competent student might reasonably be expected to complete within the **three** years of the study programme”. The change to the above wording would encompass the research component of the full-time equivalent postgraduate training and replace the loose wording of “evidence of research activity”.

- b. The removal of the wording “**at a recognised tertiary academic institution or equivalent**” should be replaced by

**“at a recognised and accredited tertiary academic institution”.**

The proposal advises “a pass in the examination assessments is the threshold for competence, not where the candidate obtained their original qualification”. It is also claimed that this wording removes ambiguity around which institutions are recognized by DCNZ.

The DCNZ has never advised NZAO of any problems with ambiguity. The removal of this wording reflects a lack of understanding by the advisors (Claro) about the significant variations in quality and quantity of post graduate training that exist overseas.

There are well defined and widely accepted international standards for the quality of postgraduate orthodontic education.

- i. The programme should be comprehensive and structured to provide a solid foundation for all theoretical and practical aspects of Orthodontics.
- ii. The programme should be regularly assessed and accredited by formal Institutions, such as Dental Councils and internationally recognised professional organizations.
- iii. The programme should be full-time, run in an academic institution, and lasting at least three years.



- iv. The programme should include regular (at least once per year) examinations/assessments of orthodontic knowledge and clinical skills.
- v. The candidate should have treated at least 50 new patients, under the continuous supervision of qualified and experienced orthodontists.
- vi. The candidate should be ready to present a minimum number (10) of finished and fully documented cases of varying complexity.
- vii. The candidate should have conducted a research project in the form of a dissertation that has been assessed by external examiners/reviewers that is equivalent to a University of Otago Doctorate of Clinical Dentistry.
- viii. The course endeavours to ensure cultural competency and culturally safe care.

Inclusion of the eight points above would represent an extension of DCNZ's current eligibility criteria (i.e. holding an appropriate certification from a recognised academic institution), and could act as an initial quality check of the applications.

- c. The proposal recommends that **candidates whose postgraduate training cannot be verified** are allowed to progress to the New Zealand Orthodontic Specialist Examination.

This proposed change will allow a candidate to be eligible for specialist examination when both undergraduate and postgraduate training are not verifiable. Previously such a candidate was not eligible to sit the New Zealand Orthodontic Specialist Examination. The proposed change weakens the assessment process and lowers the standard of candidates for the examination.

Problems will arise when a proportion of a candidate's formal training occurs in clinics away from the main university base where the quality and the supervision of treated cases can be difficult to assess as equivalent. In Australia assessors have declined recent post graduates from Hong Kong due to changes in the structure of their post graduate training program which involved working in clinics away from the university. In Europe it is common for post graduates to complete part of their training course in a private practice settings where the quality of assessment is not standardised.

Currently any postgraduate's training is thoroughly investigated by DCNZ. Qualifications from a relatively small number of overseas tertiary institutions have automatic acceptance. In all cases DCNZ enlists a pair of qualified investigators (orthodontists) to assess the training of a candidate, who is required to provide material on their clinical, theoretical and research content.

- d. It is important that the new rules specify the number of times a candidate is entitled to sit the exam.



- e. There appears to be no reference to addressing the requirements of the “Trans-Tasman Mutual Recognition Act 1997” which legislates the mutual recognition of specialist qualifications between Australia and New Zealand. DCNZ regulations must align with those of the Australian Health Practitioner Regulation Agency (AHPRA). New Zealand is already seen as the weak link in terms of ease of Australasian specialist registration and this has been openly acknowledged and exploited by some applicants through the DCNZ. The proposed changes will compound this situation.
- f. There is no provisions made to assess cultural competence and the provision of culturally safe care for overseas graduates applying for specialist registration via the “other pathway”. The New Zealand Medical Council released a statement in May 2019, which outlines the statutory responsibilities. Such issues are very important to consider with overseas candidates who may have limited exposure to cultural essentials required to treat patients in New Zealand.

- 2. **NZA O considers that the application for registration as an orthodontic specialist in NZ under “other” should include a three-step process;**
  - a. **An assessment of the quality of postgraduate education received by the candidate to ensure equivalence to an Australian or New Zealand qualification.**
  - b. **The New Zealand Orthodontic Specialist Exam.**
  - c. **An assessment of cultural competence.**

Thank you for the opportunity to comment. We look forward to continuing dialogue on this important policy.

Yours sincerely

A handwritten signature in black ink that reads 'Marguerite Crooks'.

Dr Marguerite Crooks  
President, NZA O



**References:**

<https://www.otago.ac.nz/dentistry/postgraduate/dentistry/dclindent/index.html>

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