

[Redacted]

[Redacted]

[Redacted]

Page 2: Your demographics

Q1 Your details

Name

Neil Stephen

City/town

[Redacted]

Email

[Redacted]

Q2 Your submission is in the capacity as

dentist or dental specialist

Page 3: The proposal

Q3 Do you agree or disagree with the proposal to remove the 18-year age limit for restorative activities from the OHT scope of practice including: accredited, gazetted programmes allowing oral health therapists to perform restorative treatment on patients 18 years and older an exclusion, such as "Restorative treatment on patients 18 years and older", being placed on oral health therapists' scopes of practice until they complete an accredited adult restorative programme which will allow them to apply to have the exclusion removed (noting that the activities registered oral health therapists can currently perform within their scope of practice remain unchanged).

Strongly disagree

Page 4: Your support

Q4 Please describe why you support the proposal

Respondent skipped this question

Page 5: Your concerns

Consultation on the age limit for restorative activities in the oral health therapy scope of practice

Q5 Please describe your specific concern/s with the proposal

This appears to be a deeply divisive issue mostly along the specific interests of varying health professional groups, professional bodies and institutions. The consultation document does not in my opinion provide any real assurance that the public safety will be enhanced by the adoption of the proposal, nor is there any compelling evidence that it will result in either improved access, reduced costs or effective management of what is wrongly considered to be a group of adult patients with low complexity needs. There is insufficient evidence to support a belief that there are likely to be robust and meaningful training programmes and meaningful relationships within "teams". Furthermore there is very limited consideration (or evidence presented) as to the impact that this may or may not have on the workforce available to manage the at least historical *raison d'etre* for therapy practice the primary care management of children and adolescents in New Zealand.

I would look forward to reconsidering my view if a document were offered that specifically addresses my concerns. I urge the Council to delay a decision on this matter until a wider development process is undertaken engaging with all stakeholder groups.

Page 6: Details about OHT scope, qualifications and competencies

Q6 Do you have any specific feedback on the proposed amendments to the OHT scope of practice, prescribed qualifications or competencies as set out in appendices 1 & 2? **No**

Page 7: Specific comments on the proposal

Q7 Please provide us specific comments related to the OHT scope, qualifications and competencies. **Respondent skipped this question**

Page 8: Anything else

Q8 Do you have any further comments on the proposal? **Yes**

Page 10: Last thoughts

Q9 Please provide us your feedback

The Council has in the past (perhaps unjustifiably) been subject to criticism for disregarding the extent of feedback on its proposals. This is a very contentious issue I would like to see Council proceed with caution I think there remains work to be done if the division amongst health practitioners on this issue is to be resolved.
