

Consultations Committee  
 Dental Council of New Zealand  
 Level 8  
 Kordia House  
 109 – 125 Willis Street  
 Wellington  
 6011

18<sup>th</sup> April 2019

Dear Marie,

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

I would like to take this opportunity to provide feedback on the “Consultation on the age limit for restorative activities in the oral health therapy scope of practice” consultation document sent on 28<sup>th</sup> February 2019

My response to the consultation questions are as follows:

Consultation Question	Response	Rationale/Comments
1. Q1. 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: <ul style="list-style-type: none"> <li>○ • accredited, gazetted programmes allowing oral health therapists to perform restorative treatment on patients 18 years and older</li> </ul>	I fully support the removal of 18-year age limit for restorative activities from the OHT scope of practice.	I recognise that oral health therapists already treat adults and therefore acknowledge why this proposed exclusion is for restorative care for over 18 year olds and not an ‘adult scope’. I believe it is only appropriate for oral health therapists to be able to restore on patients over the age of 18 years within their scope of practice. Oral health therapists are already practising hygiene skills on over 18 years old and restoring permanent dentition.

<ul style="list-style-type: none"> <li>○ • an exclusion, 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).</li> </ul> <p>If you disagree, please detail why.</p>		
<p>Q2. Do you have any specific feedback on the proposed amendments to the OHT scope of practice, prescribed qualifications or</p>	<p>Yes</p>	<p>OHT's ability and scope of practice should rest on their educational preparation and competency for practice.</p> <p>There is good evidence to show that oral health</p>

<p>competencies as set out in appendices 1 &amp; 2?</p>		<p>therapists can reliably determine the boundaries of their own practice and act accordingly. Measures are in place for unprofessional practice.</p> <p>I strongly suggest that Dental Council of New Zealand regulation should not impose age limits on practice but enable practice to match educational preparation and competence: regulation should not contain wording that limits patient age and dental caries diagnosis and restorative procedures for oral health therapists</p>
<p>Q3. Do you have any further comments on the proposal?</p>	<p>Yes</p>	<p>There is enough evidence available to show New Zealander's are living with chronic dental pain and the lack of access to oral health care is a key concern. I agree with Council that having this exclusion of scope removed for oral health therapists is a start to better access for primary dental health care for the general population. Having oral health therapists' assist in meeting the oral health needs of New Zealanders should also be take into consideration when making the final decision on this consultation. Our population is ageing and it is evident that the needs of older New Zealanders will</p>

		not be met by the existing workforce and current model of dental care for over the age of 18. The role of oral health therapists in addressing the unmet need in older adults would be vital for good oral health for all; for life.
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If you have any questions or require clarification about my submission, please feel free to contact me using the contact information below.

I look forward to reading Council's decision.

Kind Regards

Kathryn Kanara  
Registered Oral Health Therapist  
Email: