

17 March 2019

Marie Warner  
Dental Council of New Zealand  
Chief Executive  
PO Box 10-448  
WELLINGTON 6143

Dear Marie

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

Thank you for the opportunity to provide comments on the Dental Council (the Council) of New Zealand's Consultation document on the age limit for restorative activities in the oral health therapy scope of practice dated 21 February 2019.

- 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:
- accredited, gazetted programmes allowing oral health therapists to perform restorative treatment on patients 18 years and older
  - 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).

If you disagree, please detail why.

**Agree**

- Q2. 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**

- Q3. Do you have any further comments on the proposal?

The Ministry recognises there are potential benefits to extending the scope of practice of Oral Health Therapists. If oral health services are to become more affordable and accessible to adults then OHTs may be able to provide publicly

funded services to eligible adults which may include the growing elderly population. Extending the scope of practice would also allow OHTs to maximise their skill set and potentially increase job satisfaction. Clearly, the provision and accreditation of relevant courses is a prerequisite to extending the scope either at undergraduate or postgraduate level.

Thank you for your work on this matter. The process of consultation is robust and will provide a true picture of the stakeholder's views.

The Ministry of Health's Oral Health Team, Healthy Ageing Team and Health Workforce support the Council's proposal and the Ministry has no further comment to make on this issue.

Once again, thank you for the opportunity to provide comments on the proposal.

Yours sincerely

Dr Riana Clarke  
National Clinical Director, Oral Health  
Population Health and Prevention