

[Redacted]

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Page 2: Your demographics

Q1 Your details

Name	[Redacted]
Company/organisation	Revive a Smile NZ Dental Charitable Trust
City/town	[Redacted]
Email	[Redacted]

Q2 Your submission is in the capacity as **company/organisation**

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
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Page 4: Your support

Q4 Please describe why you support the proposal	Respondent skipped this question
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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

As NZ's only dental charity for low income adults and at-need Kiwis we see first hand the dental problems affecting this subset of the population. Revive A Smile has been helping Kiwis since 2011 and we run mobile dental clinics that travel around NZ working in the most deprived regions and cities. We have many concerns summarised below:

- Oral health therapists are not qualified to safely treat high-risk groups such as the elderly and those with complex medical conditions taking a variety of medications. Any suggestion that giving therapists an adult scope will increase access to care for this patient group is unfounded as such patients require access dentists and dental specialists with a multi-disciplinary approach to treatment planning.

- Increasing the scope to include adults will only increase oral health inequities. It is essentially telling impoverished Kiwis that they can only access lesser trained therapists whereas Kiwis who are well off can access dentists. We believe every New Zealander should have access to a fully qualified dentist. Dentistry needs to be subsidised to make it more affordable for at-need communities. Dental council should focus on efforts to lobby the Ministry of Health to subsidise dental care rather than de-regulate the entire dental system.

- In NZ early childhood caries is prevalent throughout the country. A recent study showed 40% of children in Auckland and Northland have decayed, missing and filled teeth. DHBs have waitlists of children requiring treatment under GA. Oral health therapists are meant to be treating children to avoid such problems from occurring in the first place. Sadly, this is not happening in many parts of NZ. Increasing the oral health therapy scope to adults will take the workforce away from children and increase the rates of childhood caries and numbers of children without access to care.

- There is no evidence that increasing the scope of oral health therapists will make dental care more affordable. Therapists will have the same overhead and operational costs as dentists and it is false to say that they will charge less. It is not clear if the council is planing to put restrictions on what prices an oral health therapist can charge adults.

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? **No**

Page 10: Last thoughts

Q9 Please provide us your feedback **Respondent skipped this question**
