

[Redacted]

[Redacted]

[Redacted]

Page 2: Your demographics

Q1 Your details

Name

Carmen

Email

[Redacted]

Q2 Your submission is in the capacity as

Other (please specify):
Oral Health Therapist and Dental Student

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

The proposal to remove the 18 year age limit needs to be more carefully considered. Currently, Oral Health Therapists (OHT) in New Zealand are only trained to do simple restorations and do not have the necessary skills to deal with more complex issues which may arise during treatment, e.g. deep cavities and pulpal exposure. Without this knowledge, OHTs would not be able to offer all possible treatment options that are available for patients. This also raises the question on where to draw the line for their scope of practice. At what point of a complex procedure does an OHT's scope of practice end and a dentist's scope of practice begin? By removing the age limit, OHTs may be faced with patients with medical issues which complicate oral treatment, which is not as extensively covered in the 3 year BOH programmes compared to the 5 year BDS programme. Additionally, OHTs cannot prescribe antibiotics for patients who require antibiotic prophylaxis, thus, will require the patient to see a dentist in any case. Extending the scope of practice will be counterproductive and does not necessarily address the need to reduce oral health disparities in New Zealand.

The Community Oral Health Services is currently an aging workforce with many DHBs understaffed of dental therapist/OHTs, resulting in long waitlist for school children. Along with this, many OHT's only stay in the workforce for 1-2 years before moving to the private sector. Introducing the adult scope may result in DHBs having more difficulty in recruitment and retention of dental therapist/OHTs. Many DHB's do not treat children/adolescents past year 8 and these patients are commonly seen by a dentist, increasing the adult scope may not be very effective in reducing inequalities in individuals over 18. Efforts should be redirected in improving the Community Oral Health Services rather than increasing the scope of practice, which is already covered by other dental professionals, i.e. dentist.

Although programmes extending the scope of practice were introduced in Australia, these recently went under review by the Australian Dental Council. The approval of these Programs was decided to be phased out, meaning they are no longer accredited by the Australian Dental Council. There is no need to broaden the scope of oral health professionals in New Zealand as this skill set is already covered by dentists. The state of dental care in New Zealand is not in need of extending skill sets as there are already plenty of qualified professionals who are able to provide this care, but rather redirecting of these skills and resources that are already available.

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**