

Consultations  
Dental Council of New Zealand  
PO Box 10-448  
Wellington 6140

Via email

14 November 2022

Tēnā koutou katoa,

**RE: Dental Council's Budget & Fee/Levy Consultation 2024/25**

Te Ohu Pūniho Ora o Aotearoa – the New Zealand Oral Health Association Inc (NZOHA) represents over 1100 registered oral health therapists, dental therapists, and dental hygienists, all working across the public and private sectors all throughout Aotearoa. Our association was established to serve the oral health therapy, dental therapy and dental hygiene professions by preserving and promoting their interests and enhancing their professional profile. Our professions are steeped in history, with the establishment of the School Dental Service and training of School Dental Nurses back in 1921, to incorporating dental hygiene training and care from the 1970s, to now having trained oral health therapists who work primarily in the public (Te Whatu Ora) and private sectors throughout Aotearoa.<sup>1</sup>

Our members work within the Community Oral Health Service (COHS), which services kōhanga reo, early childhood education centres, Kura Kaupapa Māori, primary schools, and intermediate schools as well as private practices all throughout Aotearoa.

This letter is in response to feedback being sought from the Dental Council of New Zealand – Te Kaunihera Tiaki Niho (DCNZ) on the consultation on proposed budget and fee/levy consultation 2024/25 issued Friday 6 October 2023.

We would like to thank the DCNZ for consulting with the wider health and oral health sectors on the proposed consultation document. We have a few concerns and comments and have listed these as follows:

1. The cost of annual practicing certificates for our members is becoming unsustainable. In the current model, the lower the numbers of professionals in a

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<sup>1</sup> Please see: <https://www.nzoha.org.nz/the-new-zealand-oral-health-professions-history/>

Email: [contact@nzoha.org.nz](mailto:contact@nzoha.org.nz)

[www.nzoha.org.nz](http://www.nzoha.org.nz)

profession, the higher the cost the Dental Council of New Zealand needs in order to regulate the said profession.

2. Te Ohu Pūniho Ora o Aotearoa The New Zealand Oral Health Association acknowledge:
  - In 2007, Aotearoa New Zealand ceased the single-stream training programmes for dental hygiene and dental therapy.
  - The University of Otago and Auckland University of Technology introduced the oral health degree, that combined dental therapy and dental hygiene (introduced in 2009 and 2008 respectively). At that stage the oral health graduates were registered in the dental hygiene and dental therapy scopes of practice.
  - The HPCA Act recognised the creation of the new profession oral health therapy, established 1 November 2017
  - Both dental hygiene and dental therapy as professions will cease to exist in time and this will prove to be exceedingly expensive and unsustainable as each group declines in size. Only limited overseas trained dental hygienists enter the profession, with no new entries to the dental therapy profession - and a mean age of 58 years.<sup>2</sup>
  - Recognising this reality, the two separate then professional associations (NZ Dental Hygienists' Association and the New Zealand Dental and Oral Health Therapy Association) have merged their membership, and created a new professional association "Te Ohu Pūniho Ora o Aotearoa – the New Zealand Oral Health Association".
  - Orthodontic auxiliaries are a subset of the dental hygiene profession.<sup>3</sup>
  - No cost cross-subsidisation between professions can occur under Office of the Auditor General guidelines.<sup>4</sup>
3. To ensure the capability for dental hygienists and dental therapists to continue to practise with affordable and sustainable annual practising fees, and for the reasons above, we support the DCNZ's proposal to:
  - Merge the dental hygiene, dental therapy and oral health therapy professions under the umbrella profession of oral health therapy

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<sup>2</sup> See <https://www.dcnz.org.nz/assets/Uploads/Publications/workforce-analysis/Workforce-Analysis-2018-2019.pdf>

<sup>3</sup> See <https://www.dcnz.org.nz/i-practise-in-new-zealand/orthodontic-auxiliaries/>

<sup>4</sup> See <https://oag.parliament.nz/2021/fees-and-levies/docs/fees-and-levies.pdf>

- Under the oral health therapy profession, the following four scopes of practice continue to exist:
    - scope of practice for oral health therapy
    - scope of practice for dental therapy
    - scope of practice for dental hygiene
    - scope of practice for orthodontic auxiliary.
  - Practitioners will remain registered in their respective scope/s of practice. The proposed change will **not** change their scopes of practice; i.e what clinical care can be provided, or what they call themselves.
4. Points 1 – 3 were written in a support letter the DCNZ were submitting concerning a review of the HPCA Act 2003. Our letter was given to Council on 28<sup>th</sup> October 2022 and yet regrettably, no actions have been taken to address our concerns. For more than a year, we have been consistently informed that we are awaiting a submission from the dental technologists to supplement ours. However, as of the time of this submission, it has not yet been received, and we hold significant concerns regarding this delay. **We ask that Council prioritise this work immediately to ensure the viability of the dental therapy and dental hygiene professions being regulated without the cost being exorbitant.**
5. We support Council’s strategic project expenditure and implementing all three initiatives identified in the strategic plan<sup>5</sup>.
6. We acknowledge the disciplinary levy for dental therapists and dental hygienists is higher this year due to a projected Professional Conduct Committee’s (PCC) however question why dental therapists require \$25,000 for ‘professional ongoing discipline workstreams’, but only \$20,000 for dental hygienists considering there is only one PCC per profession.
7. It is an exciting time to be an oral health therapist and a dental therapist with the accreditation of the adult restorative care courses at the University of Otago and the University of Melbourne. Once completion of these courses, dental therapists will gain an additional scope of practice (Adult Care in Dental Therapy) whereas oral health therapists will have an exclusion removed from their scope. We see these courses as a positive step to having mid-level dental providers offering more

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<sup>5</sup> See: <https://www.dcnz.org.nz/assets/Uploads/DCNZ-Strategic-Plan-20222032-FINAL-web.pdf>

equitable basic oral health care that is so desperately needed for all in Aotearoa. Keeping these points in mind, in appendix 2 of the consultation document:

- a. We welcome the 'Application for registration with a prescribed qualification in an additional scope of practice' current fee (excluding GST) going from \$550.05 to a proposed fee of \$332.76. This lower cost will benefit those dental therapists being able to register their new scope of practice on successful completion of a prescribed adult restorative care programme
- b. We note for oral health therapists who have successfully completed a prescribed adult restorative care course, the proposed fee for 'Application for removal of an exclusion(s) on the scope of practice after completion of a Dental Council approved course will be \$332.76 (excluding GST), bringing the cost into line with point 7a.
- c. As the number of applications for these particular fees from oral health therapists and dental therapists is expected to increase in the future, we kindly request that the Council undertake a comprehensive review of these costs and consider reducing them. We firmly believe that OHTs and DTs seeking new qualifications, whether for the removal of exclusions or for an additional scope, should not bear the full burden of this expense, whether out of pocket or from the public sector. Charging \$332.76 (excluding GST) for a simple backspace correction seems arbitrary and in need of adjustment.

Ngā mihi



Anna Holyoake  
President – Tūmuaki  
On behalf of the NZOHA Executive