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Page 2: About your submission

**Q1**

First name

Aee

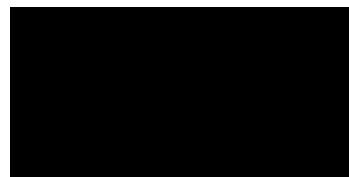
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**Q2**

Last name

Chou

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**Q4**

Are you primarily based in New Zealand or overseas?

**Overseas,**

If overseas, where?:

Canada

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**Q5**

Company/organisation name

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**Respondent skipped this question**

**Q6**

In what capacity are you making this submission?

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**Registered oral health practitioner**

Page 3: About your submission

**Q7**

What is your profession?

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**Dentist**

**Q8**

Please enter your Dental Council Person ID, if applicable

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**Respondent skipped this question**

Page 4: Proposed registration pathways

**Q9**

**Yes**

Do you believe the proposed changes will help reduce barriers to registration for suitably trained overseas practitioners?

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**Q10**

Please tell us why:

Yes, I believe the proposed changes will meaningfully reduce barriers to registration for suitably trained overseas practitioners.

The introduction of registration pathways based on recent clinical practice in recognised competent authorities and comparable health systems represents a pragmatic and proportionate approach to regulation. These pathways acknowledge that clinical competence is not solely determined by the original awarding institution, but can also be demonstrated through sustained, regulated practice in jurisdictions with robust regulatory frameworks and comparable health outcomes.

In particular, the proposed Competent authority registration and Comparable health system pathways address a long-standing gap for practitioners who are demonstrably competent, in good standing with their regulators, and actively practising, yet previously required to undertake lengthy and costly examination pathways that may not reflect their current scope, experience, or level of practice.

The inclusion of structured oversight or supervision programmes, along with the Dental practice in New Zealand module, appropriately balances reduced entry barriers with public safety. This risk-based framework ensures that overseas practitioners are supported to transition safely into the New Zealand context while allowing them to practise sooner under appropriate safeguards.

Overall, these proposals promote fairness, workforce sustainability, and regulatory consistency, while maintaining the Council's primary responsibility to protect the health and safety of the New Zealand public. I therefore support the proposed changes as a necessary and well-considered evolution of the current registration framework.

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Page 5: Introduction of the proposed 'Competent authority - registration' pathway

**Q11**

**Support**

Do you support the introduction of the 'Competent authority - registration' pathway? [Click to learn more about the proposed pathway](#)

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## **Q12**

Please tell us why:

Yes, I support the introduction of the Competent authority registration pathway.

This pathway appropriately recognises practitioners who are already registered, regulated, and practising in jurisdictions with equivalent regulatory standards to New Zealand, even where their original qualification is not directly recognised as a prescribed qualification. It reflects the reality that competence is best demonstrated through sustained clinical practice within a robust regulatory environment, rather than through qualifications alone.

By requiring recent, substantial clinical practice in a recognised competent authority, along with evidence of good standing, the pathway provides strong assurance of practitioner competence and professionalism. The additional requirement for a defined period of oversight and completion of the Dental practice in New Zealand module further ensures that patient safety and local practice standards are upheld during the transition into the New Zealand healthcare context.

Importantly, this pathway reduces unnecessary duplication of assessment for experienced practitioners who have already met rigorous regulatory, competence, and professional standards overseas. It supports workforce mobility, improves access to skilled oral health practitioners, and aligns New Zealand's regulatory approach with international best practice, while maintaining an appropriate risk-based framework.

For these reasons, I believe the Competent authority registration pathway is a balanced, fair, and well-justified addition to the existing registration framework.

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Page 6: Introduction of the proposed 'Comparable health system' pathway

## **Q13**

### **Support**

Do you support the introduction of the 'Comparable health system' pathway for dentists? [Click to learn more about the proposed pathway](#)

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## **Q14**

Please tell us why:

Yes, I support the introduction of the Comparable health system pathway for dentists.

This pathway appropriately recognises that clinical competence can be demonstrated through regulated practice in jurisdictions with comparable health system infrastructure, population health outcomes, and regulatory frameworks to New Zealand. By drawing on established methodologies used by other New Zealand health regulators, including the Medical Council of New Zealand, the proposed approach is evidence-based and consistent with wider health sector regulation.

The requirement for recent, substantive clinical practice in a comparable health system, combined with a period of direct, onsite supervision and completion of the Dental practice in New Zealand module, provides a proportionate and risk-appropriate safeguard. This ensures that dentists transitioning through this pathway are supported to adapt to the New Zealand clinical, regulatory, and cultural context, while maintaining patient safety.

Importantly, the Comparable health system pathway addresses a gap for experienced dentists who are competent, in good standing with their regulators, and actively practising, but who may not qualify under existing competent authority or examination-based pathways. It offers a fair and transparent alternative that reduces unnecessary barriers without lowering standards.

Overall, this pathway strengthens workforce sustainability, improves access to skilled dental practitioners, and reflects a balanced regulatory response to workforce needs while upholding the Council's public protection mandate.

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Page 7: Introduction of the proposed 'Teaching and research' pathway

## **Q15**

### **Support**

Do you support the introduction of the 'Teaching and research' pathway? [Click to learn more about the proposed pathway](#)

## **Q16**

Please tell us why:

Yes, I support the introduction of the Teaching and research registration pathway.

This pathway appropriately recognises the specialised role of oral health practitioners who contribute to clinical teaching, learning, and research within New Zealand tertiary education institutions, but who may not meet the requirements of existing clinical registration pathways. It reflects the reality that academic and educational roles require a different form of professional engagement and should be regulated proportionately.

The proposed safeguards, including permanent supervision, restrictions on independent clinical practice, and reliance on the tertiary institution's employment and oversight processes, provide strong assurance of public safety. These conditions clearly delineate the scope of practice and ensure that the pathway does not become an alternative route to unsupervised clinical practice.

In the context of a global shortage of oral health educators, this pathway supports the sustainability and quality of New Zealand's oral health education and research programmes, while maintaining clear regulatory boundaries between academic and clinical practice.

Overall, the Teaching and research pathway is a targeted and well-defined addition to the registration framework, addressing a specific workforce need without compromising patient safety or professional standards.

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Page 9: Proposed removal of requirement for a medical degree for oral medicine specialist registration

**Q17**

**Support**

Do you support removing the requirement for a medical degree for oral medicine specialist registration in New Zealand, subject to the relevant medical training and clinical experiences being embedded into the specialist training programme? [Click to learn more about the proposed changes.](#)

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**Q18**

Please tell us why:

Yes, I support removing the requirement for a stand-alone medical degree for oral medicine specialist registration in New Zealand, provided that the necessary medical training and supervised clinical experience are clearly embedded within an accredited oral medicine specialist training programme.

Requiring a separate medical degree as a blanket prerequisite creates a barrier that is not aligned with contemporary international training models in recognised competent authorities. In many jurisdictions, oral medicine specialists are trained through integrated programmes that incorporate substantial medical sciences, clinical medicine, and interdisciplinary care, without requiring completion of a full medical degree.

What is essential for patient safety is not the possession of a medical degree per se, but demonstrable competence in the medical knowledge, clinical assessment, and multidisciplinary management relevant to oral medicine practice. Embedding clearly defined medical competencies, supervised medical exposure, and assessed clinical outcomes within an accredited specialist programme provides a more proportionate and outcomes-focused approach.

This proposed change would align New Zealand with international best practice, reduce unnecessary barriers to specialist registration, and help address workforce constraints, while maintaining robust safeguards to ensure practitioners are competent to meet the medical complexities encountered in oral medicine practice.

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Page 10: Proposed removal of requirement to register in dental technology before registering in CDT

**Q19**

**Support**

Do you support removing the requirement to register in dental technology before registering in clinical dental technology? [Click to learn more about the proposed changes.](#)

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**Q20**

Please tell us why:

Yes, I support removing the requirement to register in the dental technology scope of practice before registering in the clinical dental technology scope of practice.

Clinical dental technology is a distinct and recognised scope of practice under the Health Practitioners Competence Assurance Act. Requiring prior registration in dental technology creates an additional administrative barrier that is not applied consistently across other oral health professions, including dental specialties, where registration in one scope is not a prerequisite for registration in another.

Where an applicant has completed an accredited clinical dental technology training programme and can demonstrate competence against the required scope-specific competencies, separate prior registration in dental technology is not necessary to ensure public safety. Competence should be assessed based on education, training, and demonstrated capability within the intended scope of practice, rather than through duplicative registration requirements.

Removing this prerequisite would improve consistency, reduce unnecessary barriers to registration, and better reflect the standalone professional status of clinical dental technology, while maintaining appropriate regulatory safeguards through accredited training and competence assessment.

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Page 11: Proposed changes to the New Zealand registration examination requirements

**Q21**

**Support**

Do you support the proposed changes to the New Zealand registration examination requirements? Click to learn more about the proposed changes.

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**Q22**

Please tell us why:

Yes, I support the proposed changes to the New Zealand registration examination requirements.

The proposed updates appropriately reflect changes in international examination models and clarify expectations around the assessment of clinical competence. In particular, the requirement that overseas licensing examinations must include a psychomotor clinical skills component is important to ensure that applicants demonstrate hands-on clinical capability, not solely theoretical knowledge. This is essential for maintaining patient safety and public confidence in the profession.

I also support the proposed clarification and expansion of eligibility criteria for dental hygiene, dental therapy, and oral health therapy registration examinations. Allowing candidates with a dental qualification to access these examinations, while relying on the examination outcome as the determinant of competence, is a transparent and proportionate approach. It enables applicants to make informed decisions about entry while preserving the integrity of the assessment process.

Overall, these changes improve clarity, consistency, and alignment with contemporary regulatory standards, while ensuring that New Zealand registration examinations remain focused on assessing the competencies required for safe and effective practice.

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Page 12: Proposed administrative changes to the prescribed qualifications

**Q23**

**All scopes**

Do you have feedback on the proposed administrative changes to prescribed qualifications for any of the scopes of practice, as reflected in the draft Gazette notices?

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**Q24**

Please tell us your feedback. When discussing multiple scopes, please indicate clearly which scope of practice you are referring to in your comment.

Yes, I generally support the proposed administrative changes to the prescribed qualifications as reflected in the draft Gazette notices.

The proposed updates to terminology, structure, and scope-specific requirements improve clarity, consistency, and transparency across the different scopes of practice. Aligning the Gazette notices more closely with the requirements of sections 12 and 13 of the Health Practitioners Competence Assurance Act enhances regulatory coherence and supports more consistent interpretation by applicants, assessors, and employers.

In particular, clarifying the status of prescribed qualifications, updating outdated entry pathways, and distinguishing clearly between qualification-based and practice-based registration routes will assist overseas practitioners in better understanding the appropriate pathway for their circumstances, thereby reducing confusion and unnecessary administrative burden.

As a minor suggestion, the Council may wish to continue ensuring that the Gazette notices clearly articulate scope-specific competencies and expectations, particularly where substantive changes have been made, to support transparency for both applicants and education providers. Overall, the proposed administrative changes represent a constructive and necessary refinement of the regulatory framework.

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Page 13: Proposed fees for the new registration pathways

**Q25**

**Yes**

Do you find the proposed fees for the new registration pathways reasonable?Proposed fee notice

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**Q26**

Please tell us why or why not?

Yes, I find the proposed fees for the new registration pathways to be generally reasonable.

The proposed fees appear proportionate to the administrative, assessment, and monitoring requirements associated with each pathway, particularly given the inclusion of oversight or supervision programmes and ongoing review of reports. As registration operates on a cost-recovery basis, it is reasonable that fees reflect the actual resources required to ensure appropriate regulatory oversight and public safety.

Compared with the financial and opportunity costs associated with existing examination-based pathways, the proposed fees represent a more predictable and transparent cost structure for suitably trained overseas practitioners. This may also reduce indirect costs related to prolonged examination preparation, delays to workforce entry, and repeated application cycles.

It would be helpful for applicants if the Council continues to provide clarity on what services and monitoring activities are included within each fee, particularly where additional costs may arise. Overall, however, the proposed fees are reasonable and consistent with the objectives of the new registration pathways.

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Page 14: Thank you for your time

**Q27**

Is there any additional feedback you would like to share on the consultation?

I would like to commend the Council for undertaking a comprehensive and well-structured consultation that reflects a thoughtful, evidence-based approach to modernising registration pathways for overseas practitioners.

The proposed changes demonstrate a clear commitment to proportional, risk-based regulation, workforce sustainability, and international alignment, while maintaining the Council's core responsibility to protect public health and safety. The clarity provided through the consultation document, draft Gazette notices, and supporting rationale is particularly helpful for overseas-qualified practitioners seeking to understand their options.

As these pathways are implemented, ongoing monitoring and periodic review will be important to ensure they continue to operate as intended, remain fair and transparent, and adapt to evolving workforce and health system needs. Continued clear communication with applicants and employers will also be valuable in supporting smooth implementation.

Overall, this consultation represents a positive and necessary evolution of the registration framework, and I appreciate the opportunity to provide feedback.

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