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New Zealand Dental Therapists' Association  
(Incorporated)

5 December 2007

Ryan McLean  
Sector Policy Directorate  
Ministry of Health  
PO Box 5013  
WELLINGTON

Dear Ryan

**Submission to the Ministry of Health on the Review of the Health Practitioners Competence Assurance Act 2003**

The New Zealand Dental Therapists' Association respectfully submit the following comments on two of the questions in the document, "*Review of the Health Practitioners Competence Assurance Act 2003: Identification of issues and solutions.*"

Part 2 of the Act: Scopes of practice and Qualifications: Question 11

*"Do prescribed qualifications reflect scopes of practice?"*

The NZDTA notes that Appendix One of the review document states that one of the two new scopes of practice proposed by the Dental Council is a Scope of Adult Care in Dental Therapy. This scope of practice already exists and involves:

*"Providing care to adult patients within the general dental therapy scope of practice (and/or any additional scope) in a team situation with clinical guidance provided by a practising dentist/s."*

The prescribed qualifications include, in addition to the qualifications required to practice within the general (and/or any additional scopes of practice), the completion of a Dental Council of New Zealand accredited course in adult dental therapy practice as a pre-requisite for registration. No such course is available and the NZDTA understand that since the Act came into force only two *further* persons, both with overseas experience, have been registered in this scope.

The NZDTA argue that a) the requirement for an additional course is not necessary to protect the public and b) unnecessarily restricts the registration of persons currently registered in the General Dental Therapy Scope of Practice (and/or additional scopes) to practice within the Scope of Adult Care in Dental Therapy because:

- The care provided would be within, and limited to, the current dental therapy scopes of practice
- These current scopes of practice already allow the provision of care to persons up to the age of 18
- Those registered to provide care under the Scope of Adult Care in dental therapy will be required to practice, "*in a team situation with clinical guidance provided by a practising dentist/s.*"

Part 6 of the Act: Structures and administration: Q36

*"Are provisions for adding new professions or health services working and what if any, changes would you make?"*

Currently dental therapists and dental hygienists are covered by two separate workforce boards that operate as sub-committees of the Dental Council of New Zealand.

However, now that separate dental therapy and dental hygiene courses are no longer available and the first graduates with a conjoint dental therapy/dental hygiene qualification graduate at the end of 2008, the NZDTA believe that as a practical measure to reduce duplication and to help contain the costs associated with regulation, it is timely to amalgamate the two workforce boards into one. There would need to be recognition that for sometime to come, such an amalgamated workforce board would cover three oral health professions – dental therapy, dental hygiene, and dental therapy/hygiene.

Whilst this is possibly an internal matter for the Dental Council of New Zealand, under the Act, the potential for proliferation of sub-committees exists and this is of concern to the NZDTA in the same way as the potential for proliferation of authorities has raised concerns amongst other groups and individuals.

Yours sincerely

Ngaire Mune, Executive Officer, NZDTA