

To whom it may concern,

My name is Nelson Cornish-Bayer and I am a registered Oral Health Therapist. I am writing in regards to the public consultation on the 'Draft scope of practice registration standard and guidelines'.

1. Do you agree that the revision to the standard will provide greater clarity and certainty for dental practitioners to work within their scope of practice? (Why or why not?)

In regards to the revision, I feel that this is an adequate change needed in the industry to define the difference between dental practitioners and their abilities in treating patients. The scope of practice for Oral Health Therapists is very blurry in some areas and many practitioners are unaware of the exact lines in what they are able to treat and not treat.

2. Do you agree that the introduction of the guidelines further supports this clarity for dental practitioners and the public? (Why or why not?)

In regards to the clarity of the profession for the public and practitioners, I feel the guidelines will greatly improve the standard of what people expect, but also allow them to access precise guidelines in regards to a specific practitioner's scope of practice. It will outline the abilities that are allowed to be performed by each practitioner and allow for a common expectation by the public. There needs to be a clearer cut professional outline for Dental Therapists and Oral Health therapists alike

3. Are there additional factors which could be included in the guidelines to support the standard?

In agreeance with lifting the age restrictions for OHT's to work with I think is one of the most beneficial things that could happen for the public and practitioners alike.

I have experienced firsthand the lack of access to healthcare and/or providers in rural areas when compared to metropolitan

I feel that the change of the age group restrictions is much needed, especially working in areas where healthcare availability is limited.

It is sometimes very difficult (especially in rural areas) to have to refer patients to the supporting dentist when it is a simple filling that could be done by a trained/ qualified OHT or Dental therapist. With the long waiting times, and minimal access to providers, sometimes that patient will not be able to be seen by the dentist for up to several weeks.

It is understandable that all aspects of treatment will not be able to be provided by an OHT e.g. crown/ bridge, RCT etc, but for simple restorations etc I think it will be highly beneficial and also profitable for government and private institutions if these guidelines are to be passed.

Changing the age restrictions will allow for a wider range of care to be delivered to a larger demographic of people

In regards to any additional factors, I think that at this point it is fair to say that these initial changes will be sufficient at this point in time. I feel the industry and its professionals will take some time to adjust to the new changes and another review of the guidelines in 12-24 months or so should be adequate to readdress any new issues that have arisen.

4. Do you agree with the list of skills in the guidelines relating to programs to extend scope? Are there additional skills which the National Board should consider adding to the list?

I feel that if this revision is passed, it will widely benefit the entire public and practitioner base as it will allow greater access to healthcare and its providers. I strongly agree on these potential changes to the scope of practice and feel it should've been done sooner.

Some additional skills I think that would also benefit the profession is the ability to;

- Suture; in some cases when performing periodontal treatment on patients where the gingival tissue has been either raised or traumatised. Also in some extraction cases where suturing would be indicated.

- Orthodontic extractions

However in some of the above mentioned cases I feel it would be necessary for additional educational courses to be made available to all health practitioners by registered training organisations before being allowed to perform these skills.

5. Does the preferred proposal balance the need to protect the public with the needs of regulating the profession? (Why or why not?)

The mentioned proposal will give practitioners and the public the information needed in order to protect the best interests of the parties involved. In regards to regulation of the dental profession, I think that the scope of practice especially for Oral Health therapists and Dental therapists alike has been quite blurry for far too long. A definite outline needs to be established. Once this is done, it will in turn protect the public in regards to treatment being allowed to be performed by certain practitioners, but also regulate the industry in defining lines which cannot be crossed and prevent areas of potential litigation in the future.

I feel I have expressed my opinion thoroughly, also having fellow therapists in mind as I have written this. Furthermore, if you would like to contact me personally, I would be more than happy.

Kind regards

Nelson Cornish-Bayer