



**THE CANADIAN DENTAL HYGIENISTS ASSOCIATION  
L'ASSOCIATION CANADIENNE DES HYGIÉNISTES DENTAIRES**

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Dear Ms Harvey,

Thank you for chatting with me recently about your upcoming review of health professional regulations. The Canadian Dental Hygienists Association strongly encourages you to remove the supervision clause in your dental hygiene regulations, in order to enable direct access to dental hygienists (independent practice). The benefits for the public, including improved oral health status, cost benefits to public oral health programs/services and increased competition for oral health services are outlined in Appendix A. I have also outlined some benefits for the public to have dental hygiene regulations that make it mandatory for dental hygiene registrants to hold membership in the Canadian Dental Hygienists Association. I have provided a link in Appendix A to dental hygiene regulations in Alberta. They are model regulations that are the most progressive in Canada when it comes to providing public access to dental hygiene services. I encourage you to consider these regulations when forming your own regulations.

Please let me know if you have any questions about the information provided. I look forward to working collaboratively with you on this issue.

Regards,

Judy Lux, MSW

Health Policy Communications Specialist

## **Appendix A**

### **Background**

The majority of provinces across Canada have dental hygiene legislation that enables dental hygienists to practice independently from dentists, except in Newfoundland and Labrador, and Prince Edward Island, Nunavut, NWT and Yukon. New regulations that include independent practice in Newfoundland are anticipated within the next year.

Please find attached an Excel chart (file name: regulatory body chart) that has 5 tabs with information pertaining to professional liability insurance requirements, National Dental Hygiene Certification Board Exam requirements, and a clinical exam. The last three issues are classified into two categories, depending on whether or not the dental hygienist has graduated from an accredited or non-accredited dental hygiene program. The excel chart also includes information regarding mandatory continuing competencies and mandatory clinical practice hours.

Dental hygiene regulations in Alberta are the most modern regulations in Canada when it comes to independent practice. The regulations also allow dental hygienists to prescribe Schedule 1 drugs (see page 8 of the document link below). The following is a link to Dental Hygiene Regulations in Alberta: [http://www.qp.alberta.ca/574.cfm?page=2006\\_255.cfm&leg\\_type=Regs&isbncln=0779751108](http://www.qp.alberta.ca/574.cfm?page=2006_255.cfm&leg_type=Regs&isbncln=0779751108)

### **Benefits to the public when dental hygienists have independent practice**

#### **1. Improved Access to Care and Oral Health Status**

The Canadian Dental Hygienists Association (CDHA) believes that direct access to dental hygiene services will improve access to care, since dental hygienists in independent practices will be able to provide services in communities where dentists are not presently located. Dental hygienists have portable equipment and they can provide services in long-term care facilities, rural and remote communities, with little difficulty.

Health Canada, First Nations Inuit Health Branch (FNIHB), Non-insured Health Benefits (NIHB) program is now conducting a pilot project where dental hygienists provide services directly to NIHB eligible clients. Please find attached a press release (file name: FNIHB, NIHB) providing more information on this topic. This project is taking place in Alberta and it involves 10 dental hygienists. We are very pleased to report that they have served 89 clients since May 2010. NIHB is now encouraging other provinces/territories to consider starting a similar pilot project as it will improve access to care. In order for Nunavut to participate in this pilot project, regulations will need to be changed to enable dental hygienists to practice without a dentists' supervision.

## **2. Improved Cost Efficiencies for Public Oral Health Programs/Services**

Enabling dental hygienists to practice without the supervision of a dentist also means that the public will be able to choose the health professional who best suits their needs. They will not schedule appointments with more costly health professionals, such as dentists, unless they require those specific services.

In addition, dental hygienists focus on oral health promotion and disease prevention, so direct access to these services means that government dental programs will save money down the road on costly dental repairs and extractions.

## **3. Enhanced Competition and Improved Consumer welfare**

The Competition Bureau Canada has been very supportive of independent practice for dental hygienists. Please find below some links to several letters sent by the Competition Bureau Canada. They support independent practice for dental hygienists as this will result in better services to the public and less restrictions on competition for services.

1. <http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/02033.html>
2. <http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/02494.html>
3. <http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/02278.html>

## **Benefits to the Public when regulations include mandatory CDHA membership**

There are also 5 provinces (Alberta, British Columbia, Newfoundland and Labrador, Saskatchewan and New Brunswick) that have legislation that requires dental hygienists to obtain mandatory membership in the Canadian Dental Hygienists Association (CDHA). Mandatory membership in CDHA ensures that dental hygienists are linked with an organization that provides professional development opportunities to ensure they keep their skills and knowledge current. CDHA is committed to ensuring dental hygienists have access to high quality professional development opportunities, as it ensure quality service delivery. As part of our ongoing professional development services, we provide dental hygienists with easy access to the latest research and practice standards. We also provide dental hygienists with access to the Canadian Journal of Dental Hygiene, and clinical practice position papers (e.g. infection control), the code of ethics and professional competencies and standards. And, every second year, we offer a professional conference with workshops for educators and presentations on cutting edge research. Please see the attached excel spreadsheet for the competencies tab which describes 7 regions in Canada that require dental hygienists to report on how they have developed their ongoing continuing competencies. Two additional regions are in the process of making continuing competencies an important part of their regulations.

Mandatory membership in CDHA also ensures that dental hygienists receive professional liability insurance. CDHA's liability insurance gives dental hygienists 1 million dollars per claim and 3 million dollars per policy period, with no deductible. It also provides protection for the public with Abused Patient Therapy and Counselling Coverage for \$10,000 limit per member. For more information, please visit <http://www.cdha.ca/AM/Template.cfm?Section=Benefits>