

April 2022

Re: Position on proposed companion animal dental regulation 2021

Background:

The New Zealand Veterinary Nursing Association (NZVNA) is a voluntary representative body, leading by our values to protect, inspire and advance allied veterinary professionals in Aotearoa New Zealand.

We work closely with the Allied Veterinary Professional Regulatory Council (AVPRC) who currently hold a voluntary regulation scheme with 700 registered veterinary nurses and technicians. Registration requires demonstration of clinical currency, fitness to practice, and a formal veterinary nursing qualification of at least 240 credits, or 2400 learning hours, or two-years equivalent full time, that is also mapped for equivalency to New Zealand educational standards.

Issue of concern:

In 2015 the Animal Welfare Act 1999 was amended and this included criteria that defined *significant surgical procedures*. On 9th May 2021 the Animal Welfare (Care and Procedures) Regulations 2018 were enacted to allow for some of these significant surgical procedures to be undertaken by *non-veterinarians*. During the consultation phase for this regulation, there were multiple requests from the NZVNA, AVPRC and the New Zealand Veterinary Association to ensure a regulation was put in place to *continue to allow* subgingival scaling and periodontal probing to be undertaken by registered AVPs (specifically registered companion animal veterinary nurses and technicians). This regulation was not enacted, and without this regulation, it is now illegal for veterinary nurses and veterinary technicians to subgingivally scale and carry out periodontal probing, despite it being a common standard of practice in New Zealand.

This current regulation limits common standards of practice in New Zealand where companion animal veterinary nurses and technicians carry out subgingival scaling and periodontal probing as part of the comprehensive oral health examination and treatment (COHAT). In the 2019 New Zealand Veterinary Nursing Association Census of Veterinary Nurses ([page 22](#)), survey results showed that 95% of working veterinary nurses stated that they received training in dental prophylaxis, 58% perform the procedure regularly, and 27% perform the procedure at least once per week.

Dental care for companion animals, such as COHAT are common in New Zealand, and overseas where standards for veterinary nursing practice in the [UK Royal College of Veterinary Surgeons](#) and [USA American Veterinary Medical Association](#) provide guidelines for similarly trained companion animal veterinary nurses who are able to perform examination (including periodontal probing), scaling (including subgingival scaling) and polishing tasks on a routine basis.

In New Zealand, companion animal veterinary nurses undertaking the NZ Diploma in Veterinary Nursing receive COHAT training and current training standards are being improved even further as a new companion animal veterinary nursing diploma qualification has just been approved by the New Zealand Qualifications Authority (NZQA). This qualification has embedded AVPRC Graduate Competencies that have been mapped to UK and North American educational standards for qualified and registered veterinary nurses. Within these standards are criteria to facilitate full and complete COHAT, excluding extractions.

These new qualifications are very well supported by industry with more than 100 key industry stakeholders participating in the qualification development working groups, and several hundred supportive industry responses collected during the wider industry consultation for this qualification. The resulting qualification can be seen on the NZQA website [here](#). The mapped Graduate Competency can be seen in appendix 2 below.


Position:

In response to the current SSP legislation restricting subgingival scaling and periodontal probing to veterinarians only, it is our position that these regulations are unnecessary and restrictive to veterinary practice where the full range of veterinary nursing skills could be utilised to optimise efficiencies and patient outcomes.

It is our view that a regulation be enacted with urgency, that would allow *New Zealand registered companion animal veterinary nurses to undertake subgingival scaling and periodontal probing as part of companion animal comprehensive oral health examination and treatment procedures.*

We respectfully request that urgent and careful attention be paid to enacting this regulation.

Ngā mihi,



Amy Ross

NZVNA President

Appendix 1

Terminology used in the allied professional industry includes the following:

- *Allied veterinary professionals* - people with a formal qualification that includes the term 'veterinary' including veterinary nurses, veterinary technicians, and veterinary technologists. These people generally have a wider scope of practice within the veterinary industry, and specifically within veterinary clinical practice.
- *Allied animal healthcare professionals* – people with a formal animal healthcare qualification that does not include the term 'veterinary'. These include animal healthcare technicians, equine dental technicians, animal rehabilitation technicians, and may also in the future include animal behaviour technicians.
- *Animal healthcare paraprofessionals* – people who are trained or qualified to assist veterinarians, and allied veterinary professionals, working in a supportive role in a clinical environment such as an animal healthcare assistant, or rural animal technician.
- Other paraprofessionals - other fields such as groomers and farriers are not currently considered healthcare providers although it is acknowledged that there are some transferable skills related to animal healthcare provision.

Appendix 2

Graduate Competency 20 - Companion Animal Dentistry

About This Competency The companion animal veterinary nurse can competently apply knowledge of preventative and therapeutic dental care to ensure a high standard of animal welfare in the safe and effective delivery of animal healthcare.

Performance Standard	Indication of content
1. Apply knowledge of preventative and therapeutic dental care to patient assessment and treatment	A. Role and scope of nursing practice within nursing care provision for patients undergoing dental care B. Major anatomical, physiological, and pathological features of the mouth/oral cavity and teeth, and the implications for dental care. C. Knowledge of dental pathology and preventative care D. Knowledge of correct techniques for basic dental prophylaxis E. Care of the dental patient F. Safe practice in relation to protection, equipment and underlying physical principles for dental procedures.