



November 29, 2019

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Email to: [CDHBC@CDHBC.com](mailto:CDHBC@CDHBC.com)

and

BC Ministry of Health  
Health Professions Review Board  
PO Box 9429, Station Provincial Government  
Victoria, British Columbia  
V8W 9V1  
Email to: [hprbinfo@gov.bc.ca](mailto:hprbinfo@gov.bc.ca)

**Re: BC Reg 276/2008 – Proposal to Amend Dental Hygienists Regulation (*Health Professions Act*)**

On behalf of the Canadian life and health insurance industry, I would like to thank you for the opportunity to provide input on behalf of CLHIA members. Insurers, through dental plans provided by employers, play a significant role in providing access to care for British Columbians.

The CLHIA is a voluntary trade association with member companies that account for 99 percent of Canada's life and health insurance business. In BC, at the end of 2017, the life and health insurance industry, through employer plans, provided more than 3 million British Columbians with access to dental care and made payments of about \$1.3 billion.

As we understand the proposed changes, many of them can be considered 'housekeeping' changes that align the Regulation better to the *Health Professions Act*, considering the shared scope of practice statements and restricted activities, including changes to standardized terms to align to the other oral health colleges' regulations.

Canadian Life and Health Insurance Association  
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In addition to the housekeeping changes, there are more substantive changes that could have a positive impact on employer plans by potentially reducing unnecessary cost. It is proposed to remove the 365-Day Rule, a requirement whereby the dental hygiene patient must have been seen by a dentist in the previous 365 days. Also planned for removal is the 'dentist-on-site' requirement for local anaesthesia administration. Both changes would bring BC inline with other jurisdictions and ease access to care.

A new category of registrant is the Temporary (Visitor) Registration, which will allow a visitor to practice hygiene for up to 90 days, with appropriate qualifications.

Lastly, the proposed language clarifies that a Dental Hygiene Practitioner can operate a private dental hygiene practice while a Dental Hygienist cannot.

That being the case, the life and health insurance industry is supportive of these changes as they bring the practice of dental hygiene in line with other jurisdictions, clarifying scope and aligning regulation with other oral health professions in BC. In addition, they will increase access to dental hygiene services by removing barriers such as the 365-day rule.

We would be pleased to discuss this with your officials at their convenience or provide any other information that you would find helpful. Please contact me directly at (416)-359-2003 or [jweir@clhia.ca](mailto:jweir@clhia.ca).

Sincerely,

*Original signed by:*

Joan Weir  
Director, Health and Disability Policy