



2023-24 Pre-Budget Submission February 8, 2023

Summary of Recommendations

- Make Better Use of Ontario's Oral Health Human Resources through:
 - Scope Enhancement for Dental Hygienists
 - Policy Changes to Support Dental Hygienists Practicing in Long-Term Care
- Support Recruitment and Retention of Ontario's Dental Hygiene Workforce by Including Dental Hygienists in the Government's Portable Benefits Initiative
- Improve Access to Care by Alignment of Ontario Publicly Funded Dental Program and Federal Dental Care Benefit

There are over **14,000** registered dental hygienists in Ontario, working in a variety of practice settings, such as:

- Dental practices with other members of the oral health care team,
- Independent practices running their own small businesses,
- Public health units and long-term care homes providing important oral care to vulnerable populations, and
- Mobile clinics delivering their services to rural and remote communities as well as to individuals who find it difficult to leave their homes.

Dental hygienists play a critical role in providing oral health care to all Ontarians. Through preventative care and screening, dental hygienists help keep Ontarians healthy and reduce the number of individuals seeking urgent medical attention for dental pain and infection in already-overloaded emergency care settings.

Ontario Dental Hygienists' Association (ODHA) represents dental hygienists across the province. ODHA's vision is oral health for all Ontarians. Our recommendations for the 2023-24 provincial budget include:

1. Make Better Use of Ontario's Oral Health Human Resources through:

a. Scope Enhancement for Dental Hygienists

It is estimated over 40 million hours are lost annually due to dental problems and associate treatments, with subsequent potential **productivity losses of over \$1 billion dollars.**ⁱ

By enhancing the "tools" dental hygienists have to assess, treat and evaluate patient outcomes, dental hygienists can work to their full scope of practice. ODHA recommends expanding the tools for dental hygienists to provide services within the dental hygiene scope of practice:

- ordering radiographs (x-rays) in the orofacial complex;
- authority to be a Radiation Protection Officer;
- communicating a diagnosis within the scope of practice of dental hygiene; and
- ordering and administering local anaesthesia by injection within the orofacial complex.

This will improve access to the delivery of timely and effective patient-centred oral health care while enhancing capacity within Ontario's health human resources.

b. Policy Changes to Support Dental Hygienists Practicing in Long-Term Care

Shortages of health human resources in long-term care (LTC) settings have resulted in barriers to the delivery of high-quality care to residents, and the inability to meet basic needs related to activities of daily living, including oral care as required under provincial regulations.ⁱⁱ Improving the quality of oral health care services in LTC homes requires interventions directly tailored to overcome the barriers to quality care. Staffing approaches that reflect and respond to the complexity of the LTC sector and diverse resident needs are required.ⁱⁱⁱ

Ontario Regulation 246/22 under the *Fixing Long-Term Care Act, 2021* identifies mandatory interprofessional programs for long-term care homes. The regulation currently specifies four programs (falls prevention, skin and wound care, continence and bowel management and pain management). ODHA proposes the government add a comprehensive interprofessional oral health care program to the mandatory list of programs found in the Regulation 246/22. This would help ensure residents receive the care they need to protect their oral health which is vital for overall health and well-being.

2. Support Recruitment and Retention of Ontario's Dental Hygiene Workforce by Including Dental Hygienists in the Government's Portable Benefits Initiative

The government recognizes the important role dental hygienists play in the health system by considering them an essential service during the pandemic. Too often, these essential health care providers do not have coverage to access dental care themselves; **90%** of dental hygienists are paid on an hourly basis and do not receive benefits through their employers. Further, the majority of dental hygienists do not have access to benefits through their spouse or common law partner.^{iv}

Dental hygiene is a physically demanding profession, involving prolonged muscle strain and repetitive movements which increase the risk of work-related injuries leading to the inability to practice. A lack of access to a benefits program through an employer means it is difficult to offset the physical toll of this work.

ODHA requests the government include dental hygienists in the definition of workers under the proposed portable benefit program. This will assist Government initiatives to bolster Ontario's human health resources through recruitment and retention by helping to keep dental hygienists healthy and in the workforce.

3. Improve Access to Care by Alignment of Ontario Publicly Funded Dental Program and Canada Dental Benefit

The Canada Dental Benefit allows individuals who qualify for provincially publicly funded oral care to receive the Canada Dental Benefit.

The rules restricting extra billing for services covered by the publicly funded programs such as Healthy Smiles Ontario (HSO) were established when Ontarians served by this program did not have access to additional funding through the Canada Dental Benefit.

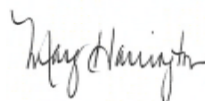
The fee schedule for HSO is well below the ODHA fee guide. This can make it financially unfeasible for dental hygienists to deliver care to HSO clients, thereby creating a barrier to access for this vulnerable population. We recommend the Ontario government update the rules governing the HSO program to enable Ontarians to use the Canada Dental Benefit to pay for the cost difference between HSO schedule of services and fees and the ODHA fee guide.

Thank you for the opportunity to provide input into the priorities for the 2023-24 provincial budget. Please do not hesitate to contact us if you have any questions or would like additional information.

Sincerely,



Jody Allen, RDH
President



Marg Harrington, MHS, MHE
Chief Executive Officer

ⁱ Hayes, A., Azarpazhooh, A., Dempster, L., Ravaghi, V. & Qinonez, C. (2013). Time loss due to dental problems and treatment in the Canadian population: analysis of a nationwide cross-sectional survey. *BMC Oral Health*. Retrieved from: <https://bmcoralhealth.biomedcentral.com/articles/10.1186/1472-6831-13-17>

ⁱⁱ Province of Ontario (2011). A guide to the Ontario Long-Term Care Homes Act, 2007 and Regulation 79/10. Queen's Press for Ontario. Retrieved on-line: <https://www.hqontario.ca/Portals/0/Documents/pr/ltc-mohltc-ltcha-guide-phase-1-1206-en.pdf>

ⁱⁱⁱ Ministry of Long-Term Care (2020). Long-term care staffing study. Ontario Long-Term Care Staffing Study Group. July 30, 2020. Queen's Printer. Retrieved on-line: <https://www.ontario.ca/page/long-term-care-staffing-study>

^{iv} Ontario Dental Hygienists Association (2022). Benefits Survey of ODHA Members. Unpublished.