



Canadian Life & Health
Insurance Association
Association canadienne des
compagnies d'assurances
de personnes

October 11, 2024

Comments on Proposed Dental Hygienist Profession Regulations
Policy, Legislation, and Intergovernmental Relations
Department of Health and Social Services
Government of the Northwest Territories
PO Box 1320
Yellowknife, NT, X1A 2L9

Sent via email to: dhsregs_feedback@gov.nt.ca

Re: Proposed Dental Hygienist Profession Regulations

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 Northwest Territorians.

About the CLHIA

The CLHIA is a voluntary association whose member companies account for 99 per cent of Canada's life and health insurance business. These insurers provide a wide range of financial security products including life insurance, annuities (including TFSAs, RRSPs, RRIFs and pensions) and supplementary health insurance to nearly 30 million Canadians. They hold over \$1 trillion in assets in Canada and employ almost 180,000 Canadians.

Canada's life and health insurers:

- Provided coverage for nearly 30 million – or 75 per cent of Canadians;
- Paid a record \$36.6 billion in claims for health, drugs and dental care – up 13 per cent from last year;
- Provided nearly \$10 billion in disability benefits, helping 12 million replace wages while they were unable to work;
- Employed nearly 180,000 Canadians – up more than 3,000 from 2022;
- Provided insurance products to nearly 120 million people worldwide.

Proposed Key Elements

As we understand the proposed changes, moving the *Dental Hygienist Profession Regulations* under the *Health and Social Services Professions Act (HSSPA)* instead of the *Dental Auxiliaries Act*, creates better alignment with the regulation of dental hygienists across Canada.

Removing the Dentist Supervision Requirement

This is a substantive change that could have a positive impact on employer plans by potentially reducing unnecessary cost and would align NWT with other Canadian jurisdictions.

This change also benefits Northwest Territorians who may live in communities where there is no dentist and are unable to travel to larger centres for care.

Protected Titles

Healthcare profession regulation and title protection are important steps in preventing health claim fraud in Canada.

It is recommended that it is clear to insurers and patients if there are any differences between the titles of Dental Hygienist and Registered dental hygienist.

Registration and Licensing

The proposal of dividing the Register into a General Register and Expanded Register will allow hygienists in NWT to practice a broader range of services.

It is recommended that there is a way for an insurer to identify if the hygienist is licensed under the General or Expanded Register so they can confirm the hygienist is practicing within their scope of practice.

Scope of Practice

Having an expanded scope of practice allows more patients to receive dental care, especially if they reside in an area where they do not have access to a dentist, but may be able to receive care from a hygienist. Including activities such as administering local anesthesia, prescribing drugs, orthodontic and restorative procedures will align with the scope of hygienists in other provinces and eases access to care.

Dental Hygienist Fees

We understand it is anticipated that fees, license expiry and renewal requirements will remain unchanged. However, we encourage consideration of the creation of a NWT Dental Hygienist Fee Guide as many other provinces have done.

The life and health insurance industry is supportive of the proposed changes as they bring the practice of dental hygiene in line with other jurisdictions, clarifying scope and aligning regulation with other jurisdictions in Canada. In addition, they will increase access to dental hygiene services by removing barriers such as the dental supervision requirement.

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 (613)-449-0679 or sburns@clhia.ca.

Sincerely,

Sheila Burns
Director, Health and Disability Policy