



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

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December 21, 2009

Sheila Fraser  
Auditor General of Canada  
240 Sparks Street  
Ottawa, Ontario  
K1A 0G6 Canada

Dear Auditor General:

**Re: First Nations and Inuit Health Branch, Non Insured Health Benefits program**

I am writing to you in my capacity as Chief Executive Officer of the Canadian Dental Hygienists Association (CDHA), in regards to the Standing Committee on Finance report, *A Prosperous and Sustainable Future for Canada: Needed Federal Actions*, that was submitted to the House of Commons in December 2009 with the following recommendation:

***“...the government should revise applicable programs and procedures within Health Canada’s Non-Insured Health Benefits Program for First Nations and Inuit to allow independent dental hygienists to receive payment for the services provided to beneficiaries of these health benefits.”***

CDHA joins the Standing Committee on Finance in urging the federal government to amend federal program spending policies and procedures within the First Nations and Inuit Health Branch, Non Insured Health Benefits (NIHB) program, to enable dental hygiene business owners to provide services to NIHB clients on a fee-for-service basis.

Many First Nations and Inuit peoples live in rural and remote communities, where poor oral health and limited access to service providers indicate a serious need for services. The House of Commons Standing Committee on Finance believes that: “...the federal government should address these challenges in order to ensure that our First Nations and Inuit peoples can contribute to our prosperous future.”

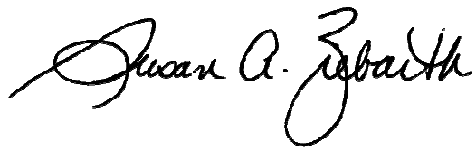
The prevention focus of dental hygienists puts them in a unique position to improve oral health and lower downstream restorative costs. Dental hygienists are positioned eighth in the size of health professional groups in Canada, giving them significant potential to meet the oral health needs of First Nations and Inuit peoples.

Today, a total of twenty-nine dental health benefit plans reimburse dental hygienists directly for their services, including three Government of Canada plans, four provincial government plans and twenty-two private plans. NIHB must follow the leading standards set by these dental insurance plans. Reimbursing dental hygienists for their services will increase access to care, increase competition in dental services, and create cost effective dental services for First Nations and Inuit peoples. In addition, NIHB program inconsistencies must be addressed, since the program reimburses dentists for dental hygienists prevention work but it does not pay dental hygienists directly for this work. This restricts competition and provides dentists with an unfair competitive advantage over dental hygiene business owners. NIHB should change these discriminatory policies and procedures and encourage the growth and development of new, small dental hygiene businesses.

We recommend that you make this matter of special importance in your role holding the federal government accountable for its stewardship of public funds. Enabling dental hygienists to provide services to NIHB clients on a fee-for-service basis is a solution that promotes cost effective, efficient service delivery models and improved quality of care.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Susan A. Ziebarth". The signature is written in a cursive style with a large, looped initial 'S'.

Dr. Susan A. Ziebarth,  
Chief Executive Officer  
Canadian Dental Hygienists Association

CC: Melanie L. Aitken, Commissioner of Competition, Competition Bureau