



November 28, 2025

British Columbia College of Oral Health Professionals
110-1765 8th Avenue W.
Vancouver, BC
V6J 5C6
Via Email: consultations@oralhealthbc.ca

Dear BCCOHP:

Re: BCCOHP Proposed Bylaws Feedback

As the collective voice for dental hygienists in British Columbia, we are writing to provide feedback on Parts 1, 13, and 14 of BCCOHP's proposed bylaws.

BCDHA has carefully reviewed Parts 1, 13, and 14 of the proposed bylaws that were recently released for consultation and are pleased to share the following comments:

Part 1 – Interpretation

The proposed definition of "facility" is limited to a facility where dentistry is practiced. However, our interpretation of "facility" under Part 14.25(1) is that a facility is a physical location in compliance with "standards for deep sedation or general anesthesia, or both, rather than a place where only dentistry is practiced.

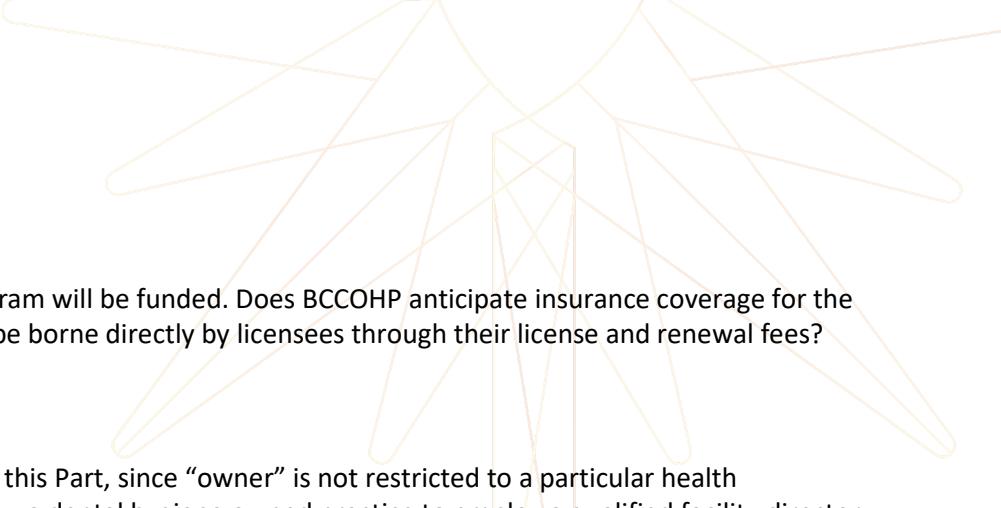
The proposed wording limiting a facility to the practice of dentistry prevents the practice of dental hygiene to be conducted for clients under deep sedation or general anesthesia, services which are part of a comprehensive oral health care plan.

BCDHA proposes that the definition of "facility" and the conditions that must be met for accreditation of the facility be based on the facility's capability to provide deep sedation and/or general anesthesia, rather than be defined by a particular oral health profession and its specific scope of practice. If the bylaw purports to include other forms of sedation, including mild sedation (i.e. nitrous oxide, oral conscious sedation), or specific forms of conscious sedation, this must be clearly defined in the bylaw.

Alternatively, we propose the definition of "facility" be revised to "a health care facility at a single physical location in which a designated **oral health** profession is practiced.

Part 13 – Support Programs

We recognize that the HPOA requires BCCOHP to establish a support program for complainants when sexual misconduct or similar conduct violations are alleged against a licensee. Our concern



relates to how such a program will be funded. Does BCCOHP anticipate insurance coverage for the program or will the funds be borne directly by licensees through their license and renewal fees?

Part 14 – Accreditation

We have no concerns with this Part, since “owner” is not restricted to a particular health profession. This would allow a dental hygiene owned practice to employ a qualified facility director and supports the need to revise the definition of “facility” in Part 1 to include the practice of dental hygiene, as we have previously noted.

BCDHA once again applauds BCCOHP for its proposed bylaws that lift some of the current restrictions that limit access to preventive oral health care for British Columbians and restrict dental hygienists from practicing to their full scope as set out in the Entry-to-Practice Canadian Competencies for Dental Hygienists. We respectfully request your consideration of our feedback to further these initiatives.

Sincerely,



Leta Zaleski, DHP-C, BSc, MEd.
Interim Executive Director