



May 30, 2026

Legislative Unit
Manitoba Health, Seniors and Long-Term Care

Re: Consultation on the College of Dental Hygienists of Manitoba (CDHM) proposed Reserved Acts

On behalf of CAMRT-MB, thank you for the invitation to provide feedback regarding the College of Dental Hygienists of Manitoba (CDHM) proposed Reserved Acts and Change in Scope of Practice proposals under The Regulated Health Professions Act (RHPA). We appreciate the opportunity to participate in this consultation process.

CAMRT-MB recognizes the importance of modernizing and standardizing health profession regulation in Manitoba through the RHPA framework. We support approaches to enhance patient access to care while ensuring appropriate professional standards, competency requirements, and patient safety safeguards remain in place.

With respect to Reserved Act 10(e), CDHM has requested authority to “apply the application of dental x-rays” where appropriate to the practice of the registered dental hygienist (RDH). The proposal further identifies that the “application and interpretation of x-rays is essential in RDH practice to observing subgingival calculus and monitoring bone loss to properly assess and diagnose the oral health of an individual,” and notes that dental hygienists in Manitoba currently perform this activity routinely in practice.

CAMRT-MB does not oppose dental hygienists utilizing ionizing radiation for imaging within the context of their professional practice and scope of work. We acknowledge the proposal’s indication that the performance of Reserved Act 10(e) is already a regular component of RDH practice in Manitoba and other Canadian jurisdictions, and that the use of dental radiographic imaging supports timely assessment, diagnosis, and intervention in oral health care.

We also note the proposal’s reference to national competencies and entry-to-practice educational requirements supporting the performance of this reserved act. CAMRT-MB



supports the continued expectation that appropriate education, competency assessment, quality assurance processes, and radiation safety standards remain in place to ensure the safe and effective use of ionizing radiation in patient care.

More broadly, we encourage Manitoba Health, Seniors and Long-Term Care to ensure that any expansion or clarification of reserved acts under the RHPA continues to prioritize:

- patient safety;
- clear competency and educational standards;
- appropriate regulatory oversight;
- interprofessional collaboration; and
- transparent communication regarding professional roles and responsibilities.

Thank you again for the opportunity to provide input on these proposals.

Sincerely,

A handwritten signature in black ink, reading "DMcTaggart", is positioned below the word "Sincerely,".

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