From: Jeff Kestenberg

Sent: Tuesday, 8 May 2018 12:03 AM

To: dentalboardconsultation <dentalboardconsultation@ahpra.gov.au>

Subject: Scope of Practice Consultation

Dr John Lockwood Chairman Dental Board of Australia

Dear Dr Lockwood,

I would like to express my disappointment and sincere concern that the Dental Board of Australia is considering changing the scope of practice for Dental Auxiliaries. I fully support the Australian Dental Association position on this proposal but would like to also express my own thoughts.

As an employer of 6 dental hygienists and an oral health therapist, I oversee the treatment provided by these auxiliaries. Every single day I find it necessary to discuss patient treatment and treatment plans to provide the best possible treatment and outcome for our patients. This can only be done in an environment where dentists and auxiliaries work together under the one roof, with close supervision and "instant access" for the dentist and the hygienist to provide an efficient and hence cost efficient service for the community.

I understand that the rationale for the consideration of changing the scope of treatment is predominantly to lower the cost of dental services for patients. However, I believe that this would have exactly the opposite effect for most people as they would need to seek separate visits for dentists and auxiliaries and has the potential to lead to over servicing. The experience in other jurisdictions has shown that the provision of more practitioners in itself will create more 'demand'. This is exactly why the government, for example, limits the number of licences for retail pharmacies.

In addition, there is no evidence anywhere in the world that an increase in the number of providers of dental services or the access to dental services, leads to an improvement in the dental health of a community or a reduction in fees. We have already seen this in Australia with an oversupply of dentists in many areas has resulted in no changes in dental fees for patients. Simply the overheads of running a dental practice doesn't change when there are more practitioners and profit margins are small compared to many other industries.

Indeed I believe resources of the Dental Board and government should be redirected to education of the community, particularly children with respect to oral hygiene and well balanced diets, together with the promotion of water fluoridation, and the legislative control of sugars in processed foods and modification of other 'unhealthy lifestyle choices' such as smoking, etc.

Finally, I implore the Board to research the dental needs of the community with good independent research and investigations before making final decisions which may be detrimental to the community and the dental profession. Until finite conclusions about dental manpower can be made, the status quo should be maintained.

Thank-you for considering my submission.

Dr Jeffrey Kestenberg Dentist