

From: David Drew
To: [dentalboardconsultation](#)
Subject: Proposed changes to scope of practice
Date: Saturday, 12 May 2018 2:19:05 PM

Dear Sir/Madam,

The DBA has suggested changes The Scope of Practice Registration Standard and Guidelines for Scope of Practice that concern me a great deal. I have been a Periodontist for 18 years and worked as a general dentist for 17 years prior to that.

I would be most happy with Option 1 in this paper (see point 58, page 8, retain the Status Quo).

Nevertheless, if the DBA did decide to go with Option 2 (point 60 page 8) I am deeply concerned for the safety and wellbeing of patients if Dental Therapists and Oral Health Therapists will be free to carry out 'tooth removal' as suggested Under 'Proposed Revised Guidelines for Scope of Practice' page 14. Extractions can appear to be simple in some cases but often don't turn out that way, and many involve surgical intervention, particularly dilapidated adult teeth. Deciduous teeth are generally less complicated. Perhaps restriction to 'deciduous tooth removal' may be better wording.

I understand the DBA wants to revise and update this document (Option 2) for many valid reasons. However, under Option 2, point 60 (page 8) I would like to put my support behind removal of dot point 4 that states 'Remove requirements for Dental Hygienists, Dental Therapists and Oral Health Therapists not to practice as independent practitioners'. I refer you to submissions from the ADA and ANZAP outlining some of the reasons supporting this argument.

Thank you for considering this matter.

Kind Regards,

Dr David Drew, BDS, MDS