24 December 2015

Dr John Lockwood AM
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By email: chair@dentalboard.gov.au

Dear John

Re: Public Consultation - Consultation on proposed entry level competencies for dental specialties

Thank you for the opportunity to comment on the proposed entry level competencies for dental specialities. The Australian Dental Council (ADC) would like to make the following general comments.

It is pleasing to see that draft entry level competencies for dental specialities are being developed as this completes the suite of professional competencies for all of the dental professions. It is particularly timely given that the 'Accreditation Standards for Dental Practitioner Programs', effective from 1 January 2016, requires ADC accredited program providers to map their program outcomes to the relevant attributes and competencies. It is noted in the 'Assumptions' section of the consultation document that the intention is for the proposed competencies to build on the ADC professional attributes and competencies of the newly qualified dentist. This will ensure alignment and consistency between the various sets of professional competencies.

In terms of the general structure, we support the principle of identifying generic competencies that are common across all specialities while identifying those that are specialty specific. This aligns well with the revised format of the 'professional competencies for dentists/dental hygienists/dental therapists/oral health therapists/dental prosthetists' which will be published early in 2016.

However, linking the 'equivalence of qualifications assessment' (Page 20 of the consultation document) to an Australian Qualifications Framework (AQF) Level 9 (Masters Extended) program is not necessarily a requirement for a specialist dental education program and does little to distinguish specialist programs for those that train a general dentist given that there are three ADC accredited (and DBA approved) programs at AQF 9 that enable graduates to register as dentists.

The ADC currently accredits two programs that are not required to comply with the AQF framework (via two Royal Colleges) and there is nothing precluding another education provider from developing a similar program as an alternative pathway to specialist registration. As there is no requirement in the ADC/DC(NZ) accreditation standards or in the Dental Board of Australia's published documents that would require an education program to conform to the AQF, linking and using similar descriptors does not seem to be required and if anything adds an unnecessary level of complexity to the document.

Linking to an AQF Level 9 also implies that the graduates of accredited and approved programs or overseas graduates seeking assessment of their qualifications must have a substantive research component to their education (i.e. execute a substantial research based project). This is not a requirement for accreditation according to the ADC/DC(NZ) accreditation standards and is not addressed in the registration standards, guidelines to the registration standards, nor is it reflected in the competencies as described for each of the specialties. The competencies address research literacy and the ability to incorporate research into evidence based practice, but this is separate from requiring a research component or equivalent be included in a program. If it is not a requirement to practice as a specialist, then it should not be highlighted in the document.

Please do not hesitate to contact Mr Michael Carpenter at the ADC should you require further information or clarification.

Yours sincerely

Professor Michael Morgan
President
Australian Dental Council

Cc: Ms Michelle Thomas, EO, Dental Board of Australia