From: [redacted]
To: dentalboardconsultation
Subject: Re Draft Proposal for Scope of Dental Practice
Date: Saturday, 25 May 2013 9:53:38 AM

RE: Dental Board, proposed Scope of Dental Practise document.

To whom it may concern:

The draft proposal for the so-called "scope of practice for dental practitioners" purports to change what dental practitioners will be allowed to do. There are quite a few questionable proposals, which to all intents do not appear in the interests of the patients we treat. That it contains ambiguity could cause problems for dentists and dental specialists, and is a flaw that will impact on the general public. My concerns are listed as follows:

1) On the one hand it is stated several times (pages 8 and 15) that dentists and dental specialists "... may practise all parts of dentistry ...", yet on pages 8 and 14 is stated "... must only perform those dental procedures for which they have been formally educated and taught in programs of study approved by the Board ..." This latter statement applies to all the 'divisions' of dental practitioners and the list includes dentists and dental specialists, along with the ancillary "technicians" (prosthetists, hygienists etc). Furthermore the document states that "The approved programs are those which ... lead to registration as a dental practitioner in the division or speciality..."(page 18). Herein lies not just an overt contradiction, but a fundamental flaw to the detriment of the dentist or dental specialist and ultimately of the patient. The issues are manifold:

- *What, exactly, is the board's intent with this approach?*

- *If a dentist cannot perform any procedure not proscribed by his/her formal education, is the patient then forced to seek specialist treatment elsewhere in every instance?*

- *what happens if the patient cannot afford specialist services?*

- *what happens if the patient is unable to travel to seek specialist services?*

- *what happens (as is the case with most of my Italian-speaking migrants) if a dentist is not allowed to carry out such treatment, and there simply is no specialist available who can adequately communicate and inform the patient due to restricted language ability?*

Again, how does such an intent, from the proposal, benefit the patient?

2) The National Board "... has not specified an approval process for courses or course providers who provide CPD." (page 19). Programs to 'extend scope' and CPD courses

are specifically excluded when it comes to programs of study that are Board-approved.

Yet it is CPD that has enabled the adaptation of so much of what dentists do. Given the time since my personal completion of the 'approved course' for registration (ie. my BDS in 1986) most of what I do I have learned from CPD and thus am practicing illegally, it would seem, according to the document.....?!

Rotary endodontics, adhesive restorations, ceramics, piezo-electric surgery, digital radiography, implant dentistry, etc, etc are all evidence-based, efficacious, state-of-the-art, "best-practice" treatment modalities. None of these were part of my "formal education" (as defined by the board's proposal).

- *Should I then cease to practice these and go back to inferior methods, at the cost of my patients' well-being?*

- *if CPD courses have no approval, and (from the draft proposal) are not recognized as formal training, then it goes that the compulsory annual CPD requirements are a sham. Why should any dentist continue with any "professional development", if it cannot be utilized for the benefit of the patient?*

3) I note that the ancillary dental technicians (hygienists, therapists, prosthetists, etc) will have their scope widened, and allowed to perform without dentist supervision.

- *How does this benefit the public?*

- *How is it that whilst the board is seemingly restricting the scope of university-educated dentists, it will permit non-degreed technicians greater scope to treat complex cases (prosthetists issuing splints for TMD?.....seriously??) via so-called "add-on" programmes?*

- *how does the patient benefit from such ancillary technicians learning from "add-on" courses, yet the higher-qualified dentists are not recognized for their CPD education?*

Like many of my colleagues that I have spoken to, I feel quite concerned in the direction, and the seeming intent, the Dental Board has proposed in the Draft Scope of Practice document. The questions and concerns I have raised are genuine, and in the greater interest of the public we serve. I await your reply to the issues i have raised.

Most Sincerely

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