Dental Board of Australia  
GPO Box 9958  
Melbourne VIC 3001

Attention: Dental Board of Australia - Consultation

**ACT Health, Dental Health Program submission on the proposed revised Scope of practice registration standard and Guidelines for scope of practice**

The ACT Health, Dental Health Program is a public health organisation that employs dentists, therapists, prosthodontists and hygienists. We welcome the opportunity to provide feedback on the revised Scope of practice registration standard and Guidelines for scope of practice as it relates to dental practitioners.

The Dental Health Program supports the changes to the revised Scope of practice registration standard and Guidelines for scope of practice.

Below is feedback in response to questions posed by the Board:

1. **From your perspective, how is the current registration standard and guidelines working?**

There is currently confusion regarding what is meant by a structured professional relationship. The current arrangements create additional bureaucracy to formally administer some processes including the development and renewal of the professional relationship contracts.

In the public health environment it would be helpful to have consistency across all AHPRA registered allied health professions and this is not the case with current scope of practice document.

2. **Are there any issues that have arisen from applying the existing registration standard and guidelines?**

The existing Scope of practice registration standard and Guidelines for scope of practice restrict capacity to develop new models of care within our organisation to improve services for our clients. This is mainly due to confusion surrounding implementation of the structured referral relationship outside a traditional dental service model.
3. Is the content and structure of the proposed revised registration standard and guidelines helpful, clear, relevant and more workable than the current registration standard and guidelines?

The Dental Health Program agrees that the content and structure of the document is clearer and easier to understand. We believe it aligns with scope of practice standard and guidelines of other allied health professionals within the organisation.

4. Is there any content that could be changed or deleted in the proposed revised registration standard and guidelines?

The Dental Health Program supports the revised document without amendment.

5. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?

The DHP agrees that a review period of 5 years is an acceptable timeframe. This would be enough time to implement and imbed changes before the next review.

6. Do you have any other comments on the proposed revised registration standard and guidelines?

No

7. Is the content and structure of the new reflective tool helpful, clear and relevant?

The Dental Health Program welcomes and supports the new reflective tool and believes it will aid dental practitioners in reflection of their practice and in the continuous learning of the individual.

8. Is there anything missing that needs to be added to the new reflective tool?

At this point no. However once health practitioners have an opportunity to use the tool, some suggestions may be forthcoming.

Yours sincerely

[Signature]

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9/5/18