

**From:** [REDACTED]  
**To:** [dentalboardconsultation](#)  
**Subject:** Scope of Practice Registration Standard  
**Date:** Wednesday, 19 June 2013 1:35:58 PM  
**Attachments:** [Scope of practice.docx](#)

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To Whom It May Concern:

Re: Scope of practice registration standard and draft guidelines – scope of Practice

I do not agree with the key recommendation, Recommendation 2,:

“To remove the bar on ‘independent practice’ on dental hygienists, dental therapists and oral health therapists.”

This decision will undoubtedly have a negative affect on Australian dental standards and therefore the quality of care administered to patients. Without proper quality control, health standards of Australia will be compromised.

I also do not agree with, description of the dental profession in the accompanying Guidelines document:

“Dental practitioners must only perform dental treatment for which they have been formally educated and trained in programs of study approved by the Board”.

Dental practitioners investing in continuous development should be given incentive to seek a standard of learning that sets Australia apart from other developed nations. Professionals lose income and time to improve their standard of care and this should be rewarded not punished, especially in an increasingly competitive market, where specialization and upskilling prevents oversupply of substandard practices.

When government spending is tight and costs need rationalization, intellectual capital and health standards should be the last to be compromised.

Kind regards,

Dr Joo Choi