

Please find attached some comments on the Dental Board of Australia's draft registration standards 66, 68, 69 and guidelines for supervision. As you can see from these comments the standards are supported by SA Dental Service with very minor suggested improvements.

Martin Dooland

Dr Martin Dooland
Director

Comments on Dental Board of Australia drafts December 2010

2. Guidelines on Supervision (for Limited Registration)

Comment closing date: 18/3/11

Summary: Describes in some detail the supervision requirements for limited registrants including:

- For DT, DH and OHT the supervision of other dental practitioners or students must be included in the arrangements of a structured relationship with a dentist
- Supervisors must have at least 4 years experience & current registration as general dental practitioner in Australia
- In the PS the supervisor must hold a position that is higher than the limited registrant (see Comment 2)
- Practice Induction/Orientation for those who have not practiced in an Australian health care setting must include an overview of the health system in Australia, and introduction to professional standards information on cultural differences and practice policies and procedures. (see Comment 3)
- Supervisors should not themselves be subject to supervisory arrangements (see Comment 2)
- Reports for PSDWS dentists are 12 monthly (see Comment 4) unless the dentist does not have an ADC listed qualification in which case they are 3 monthly (see Comment 5)
- Reports for dentists in teaching or research positions are required 3 monthly (see Comment 6)

Comment:

1. Overall the requirements seem appropriate. Some of the prescriptive detail described in the former Queensland arrangements has been omitted, such as specified levels of practice and supervision. If included, from a SA Dental Service perspective these would have increased complexity and cost while reducing country clinic practice. The templates for both the supervision plan and report seem appropriate without being too onerous.
2. This would not usually be an issue as the supervisor will be a Senior Practitioner (including the Induction/Mentoring role), Senior Practitioner or Regional Clinician.

3. The wording about induction/orientation to the Australian health system etc differs between the Supervision draft and components of the draft Registration Standard for Section 66. In particular, the former doesn't specify by whom the information should be provided while the latter specifies that it must be provided by the PS employer. Unless the differences are intended, it would be preferable for these clauses to be identical.
4. Currently these are required 6 monthly so this will relieve some of the current reporting burden
5. SA Dental Service has resolved to not employ dentists without ADC listed qualifications so this will not be an issue
6. Registration for these practitioners can extend to 4 years after which they can reapply for registration. Given that this is the longest potential period of limited registration, the 3 monthly reporting appears unusually onerous.