

17 June 2013

Ms Tanya Vogt
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AHPRA
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Dear Tanya

Public Consultation - Draft Scope of Practice Registration Standard and Guidelines

Thank you for the opportunity to respond. As I have indicated before, I believe the Dental Board has taken a significant step forward and the public sector will appreciate the changes being made. DHSV also looks forward to the review of independent practice restrictions within three years.

Background: The Dental Board of Australia (National Board) has invited feedback on a consultation paper on the draft *Scope of practice registration standard* and draft *Guidelines – Scope of practice registration standard*.

I note that a number of comments from DHSV's previous submission have not been incorporated. Many of those are still relevant so I have reattached our submission and ask that they be reconsidered. This response is directed according to the questions posed in the discussion paper and is additional to our previous response but DHSV is happy to have further discussions where required.

Questions:

- 1. Do you agree that revision to the standard will provide greater clarity and certainty for dental practitioners to work within their scope of practice? (why or why not)**

Yes – refer to past submission

- 2. Do you agree that the introduction of the guidelines further supports this clarity for dental practitioners and the public? (why or why not)**

Yes – refer to past submission. The major concern I would have is that the guidelines may be seen as too detailed and therefore introduce confusion but until it's released it will be difficult to know. I realize that resources may be constrained but maybe some form of blog may assist people to ask questions for clarification.

3. Are there additional factors which could be included in the guidelines to support the standard?

Yes – refer to past submission

In addition, I would suggest these minor amendments to the guidelines.

P15 of 23 Paragraph 2 remove the word 'work' to read '*....scope of practice and must only work within....*'

P15 of 23 Paragraph 3 replace the word 'agreements' with 'arrangements' – otherwise there are confusions with industrial agreements

P16 of 23 Paragraph 5 and 6 replace '*restorative/fillings treatment*' with '*restorative treatment/fillings*'

P16 of 23 Paragraph 6 remove the words '*bachelor degree*'. It is inconsistent with the previous descriptions and unnecessary for a recent graduate as they all receive a bachelor degree.

P17 of 23 Section 2, Paragraph 2 add a sentence. *Oral Health Therapists in Victoria are all formally educated and trained to treat patients up to the age of 25 years.*

P17 of 23 Section 2, Paragraph 3 Dotpoint 1 adjust to '*Clinical restorative skills allowing the provision of simple direct tooth restoration in the adult patient.*'

P18 of 23 Paragraph 2, Can I suggest that you either delete the courses listed and refer to a website (Approved Programs to extend scope) where they are listed so that any new ones can be added or add a sentence that indicates that any additional courses will be identified on the DBA website under Approved Programs to extend scope.

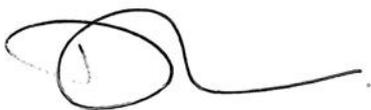
4. Do you agree with the list of skills in the guidelines relating to programs to extend scope? Are there additional skills which the National Board should consider adding to the list?

Yes – refer to past submission

5. Does the preferred proposal balance the need to protect the public with the needs of regulating the profession?

Yes – refer to past submission

Yours sincerely



Dr. Deborah Cole
Chief Executive Officer
Dental Health Services Victoria