

To Whom It May Concern:

I am currently undertaking studies towards of my degree in Dental Science and am concerned with the proposed plan and further changes in the definition and scope of professional competencies which make the distinction between the Dentists and other oral health professionals less distinct. The problem is that if the public does not have clear idea of what each occupation does and is able to practice, the profession offering the cheapest service will win with the not much attention paid to the level of expertise of the operator. The problem becomes more obvious when a lot of oral diseases and other problems will be missed by “over confident” oral health professionals practicing on the border of what is allowed and what is beyond the scope.

- 1) The draft scope of practice does not balance the available workforce against the burden of oral disease. There is an expanding workforce of dentists to meet the needs of an adult population and an unmet need in child and adolescent oral health and prevention.
- 2) A change to the ‘registration standard’ places a requirement on university curricula to then ensure they match this standard. The length of courses may have to be increased to absorb extra curricula. The DBA has no place in requiring universities to change curricula, particularly when it is not specifically to address an area of need.
- 3) Correct diagnosis of adult patients requires a variety of skill sets which require 5-7 years to acquire through a dentist’s degree. Without this complete skill set accurate diagnosis is not possible.
- 4) The definition of dentistry for a dentist is overly restrictive. A dentist degree provides a core skill set, which allows further evaluation and integration of additional skills. However, DT, OHT, DH and DP offer a restricted scope of practice and should have all of the elements of their scope of practice defined as their degrees do not provide the necessary foundation to allow for the addition of advanced skill sets.

Furthermore, if an all inclusive definition is adopted, the public will have difficulty differentiating between who is a dentist, and who is a "dental practitioner".

We need to ensure the term 'dentist' is not confused with, or equated to, other oral health professionals.

I oppose these changes and believes the DBA proposal is seriously flawed and has the potential to undermine public safety.

Kind regards

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