

Australian Dental Association
Northern Territory Branch
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Australian Health Practitioner Regulation Agency
Dental Board of Australia
dentalboardconsultation@ahpra.gov.au

RE: Consultation - registration standards

This is a submission to the Dental Board of Australia regarding the public consultation and review of the Registration Standards and Guidelines. The Australian Dental Association Northern Territory (ADANT) wishes to provide comment on the registration standards: Continuing Professional Development (and Continuing Professional Development Guideline), Recency of Practice, Endorsement for Conscious Sedation and Specialist Registration. In submitting this response, it is noted that ADANT membership is exclusively for dentists and specialists practising in the Northern Territory and views presented do not represent allied dental practitioners.

Continuing Professional Development Standard and Guideline – General Comment:

Dentists residing in Australia's more regional or remote areas, such as the Northern Territory, are not afforded equitable access to Professional Development. The Australian Dental Association Northern Territory Branch is small compared to other state branches, is run by a voluntary council and does not have designated training facilities. This effectively means that the capacity to provide suitable and frequent CPD courses is reduced, as is the ability to recruit presenters. Territorian practitioners report utilising electronic CPD activities and often travel vast distances at a substantial cost to access high quality activities. It is difficult for practitioners residing in regional and remote areas to access broad-ranging, frequent practical or scientific CPD activities in the local area. It is even more impractical for Territorian dentists who are not in full time practice to achieve the 60-hour CPD requirement over the three-year cycle. The ADANT would support provisions in the Standard to adjust CPD requirements for affected practitioners.

The ADANT feels that many members are able to readily access a range of non-clinical activities in the local area. The ADANT feels that non-clinical CPD activities are extremely beneficial for dentists and tend to provide indirect benefits to patient care – benefits which are negated by categorising the CPD activities into clinical and non-clinical components.



Revisiting the need for a distinction of the type of CPD courses to be attended may alleviate many of the disparities faced by dentists in regional and remote areas.

With regard to the CPD Guideline, it is noted that many CPD courses combine clinical and non-clinical components and dentists would benefit from clarification as to the basis for differentiation and recording of these activities within the Guideline. The ADANT also feels that less requirements for recording of CPD activities may assist members – simply keeping a log of the course date, duration, activity and record of attendance (such as a certificate or letter) would suffice.

Conscious Sedation Standard

It is noted that only two dentists in the Northern Territory undertake conscious sedation. This is proportionately less than most other states. The ADANT feels that, despite public demand, conscious sedation is under-utilised in the Northern Territory, primarily due to challenges in maintaining adequate training, equipment, clinical support and extensive associated costs which are exacerbated due to geographical location. The Northern Territory dental workforce is comparatively small and access to training, recertification and support staff is logistically challenging and financially costly in regional areas. Costs are further heightened for dental practitioners as Medicare does not rebate intravenous (IV) sedation services provided by qualified and registered IV sedationists if they are dentists, only anaesthetists. The ADANT believes that there is a need for more IV sedation services in the Northern Territory and that these services can be safely provided in adequately equipped regional and remote clinics, but is currently cost prohibitive.

Additionally, the requirement of a two-year postgraduate training period stipulated by the standard creates a significant barrier for many dentists in utilising conscious sedation. For the Northern Territory, in which a significant portion of the workforce consists of young dentists, the standard essentially prevents the uptake of conscious sedation. The requirement of a two-year period of practice seems arbitrary and does not consider the dentists individual skills and competencies. The ADANT feels that many of our members maintain an exceptionally broad scope of practice due to the nature of clientele and the burden of dental disease in the Northern Territory, particularly in rural and remote areas. The level of oral disease in the Northern Territory's population further lends itself to an increased need for conscious sedation services. The ADANT feels that under the current standard, utilising conscious sedation is unfeasible for many dentists.

Specialist Registration Standard

The ADANT advocates that specialists should be able to maintain the option of obtaining general dentist and/or specialist registration. Many specialists in the Northern Territory practise specialist and general dentistry. This forms an essential component of the



workforce and improves the provision of dental services in areas of great need. This is particularly important in a small (and largely rural or remote) workforce, where specialists may be called on to provide emergency general services, clinical mentoring and supervision, teaching, remote community services, defence force services, forensic services, public dental services or other general dental services. The dual-registration approach provides a suitable solution. The ADANT emphasises that most specialists tend to offer general services by way of filling gaps within the workforce, and asks that the Board considers the costs which may result from dual membership. It is the ADANT's strong recommendation that it should not cost our specialists more to maintain their general scope of practice.

The ADANT is concerned that the standard stipulates a requirement of a two year period as a general dentist prior to qualifying for specialist registration. This is impractical for numerous dentists in a fluctuating workforce. The demand for specialist services in the Northern Territory is profound, but to some degree could be prevented by the stipulation of the two-year period.

The ADANT is particularly concerned about the wording of the specialist registration standard. The "Restricted Scope of Practice" section which describes a specialist's role gives an unrealistic and demeaning view of specialist practice. The ADANT recognises the high level qualifications and skills that our dental specialists possess and believes that specialist registration must be recognised in the wording of the standard as is its own unique form of practice, not a limited or restricted branch of general dentistry. The ADANT strongly recommends that the wording of the standard is amended to refer to specialist-only registration as 'Specialist Scope of Practice' as opposed to 'Restricted Scope of Practice'.

General comment – Review Period

Generally, the ADANT recommends that all standards are revised on a three-year cycle. This creates a consistent approach in bringing review periods in line with CPD and registration cycles. The ADANT believes that a three-year review cycle will provide dentists with the opportunity to comment on the standards more frequently and evolve the profession in a way which considers potential changes to the workforce (numbers, scope and distribution), available education courses and modern technologies.

Sincerely,

Dr. Steven Burlinson
President
Australian Dental Association Northern Territory

