



Public consultation on draft registration standards

June 2014

Responses to consultation questions

Stakeholder Details

Organisation name
SA Dental Service
Contact information <i>(please include contact person's name and email address)</i>
Dr Geoff Franklin Executive Director SA Dental Service GPO Box 864 ADELAIDE SA 5001

Your responses to consultation questions

<p>Registration standard: Professional indemnity insurance arrangements (PII)</p> <p><i>Please provide your responses to any or all questions in the blank boxes below</i></p>
<p>1. From your perspective how is the current PII registration standard working?</p> <p>SA Dental Service acknowledges variation and a degree of confusion still exists for dental practitioners who are government employees and indemnified by the SA Health Professional Indemnity program (Third Party PII). Each dental practitioner must be aware of the limitations of Third Party PII arrangements to ensure that the scope of the PII meets the standard.</p>
<p>2. Are there any state or territory specific issues or impacts that have arisen from applying the existing PII standard?</p> <p>Nil</p>
<p>3. Is the content and structure of the draft revised PII registration standard helpful, clear, relevant and more workable than the current standard?</p> <p>SA Dental Service considers the standard could be better structured, there seems to be duplication of content, but worded slightly differently. The inclusion of the 'What must I do' section is a valuable addition and contains a clear and concise explanation.</p>
<p>4. Is there any content that needs to be changed or deleted in the draft revised PII registration standard?</p> <p>SA Dental Service considers the following areas could be amended.</p> <ul style="list-style-type: none"> The 'Are there exemption to this standard?' section duplicates the information contained in the 'Does this standard apply to me' and the "What must I do?" – would advise to have one or the other. <p>Unsure if the inclusion of the "Factors that you should consider" in the Amount of cover section add any benefit. The pertinent issue is that dental practitioners should seek advice from an insurance broker or insurer to ensure their level of cover meets the standard.</p>
<p>5. Is there anything missing that needs to be added to the draft revised PII registration standard?</p> <p>Nil</p>
<p>6. Do you think that a review period of at least every five years (rather than three) is appropriate?</p>

Registration standard: Professional indemnity insurance arrangements (PII) <i>Please provide your responses to any or all questions in the blank boxes below</i>
Why or why not?
SA Dental Service agrees that 5 year maximum period is appropriate – however consideration could be given to the following wording change “-This registration will be reviewed every 5 years, or as required, whichever occurs first.’
7. Do you have any other comments on the draft revised PII registration standard?
Nil

Registration standard: Continuing professional development Guidelines: Continuing professional development (CPD) <i>Please provide your responses to any or all questions in the blank boxes below</i>
1. From your perspective how is the current CPD registration standard working?
SA Dental Service experience is that historically there has been some confusion over what would constitute an appropriate CPD activity. (ie does it need to be board approved) SA Dental Service has previously provided feedback regarding issues associated with what constitutes CPD vs Add on Programs and considers this still to be an issue which requires further discussion/ consultation and clarification.
2. Are there any state or territory-specific issues or impacts arising from applying the existing CPD standard that you would like to raise with the Board?
Nil
3. Is the content and structure of the draft revised CPD registration standard helpful, clear, relevant and more workable than the current standard?
SA Dental Service considers the draft standard to be clear, and believes the inclusion of penalties for non-compliance with the requirements to be of merit. One suggested alteration would be re the statement “this may not apply to some categories of limited registration”- it would be preferable to state in the registration standard for dental practitioners to refer to the guidelines for further information rather than include this.
4. Do you think that: (a) a percentage of the total CPD hours should be allocated to non-scientific activities? OR (b) all CPD activities should be scientific or clinically based? (Please provide your reasons)
SA Dental Service considers it appropriate to continue with a percentage of non-scientific activities as there are aspects to dental practice (ie legal, record keeping) that require revision at times, however would advise to change this to a minimum of 80% (48 hours) devoted to scientific – this is outlined in the draft guidelines, but not stated in the registration standard.
5. Recognising that a transition process would be required, do you agree with the Board’s proposed change that the three year CPD cycle should be aligned with registration period (i.e. each three year CPD cycle run from 1 December – 30 November)?
SA Dental Service supports the Board’s proposed change that the 3 year CPD cycle align with the registration period.
6. Is there any content that needs to be changed or deleted in the draft revised CPD registration standard?
SA Dental Service has previously provided feedback regarding issues associated with what constitutes CPD vs Add on Programs and considers this still to be an issue which requires further discussion/ consultation and clarification.
7. Is there anything missing that needs to be added to the draft revised CPD registration standard?
Refer to dot point 6
8. Is there any content that needs to be changed or deleted in the draft revised CPD guidelines ?
SA Dental Service suggests the following changes: <ul style="list-style-type: none"> • Section titled - ‘What kind of activities can I do’, there are paragraphs for the definition of relevant clinical/scientific & non-scientific activities, consider separation into two different paragraph “what does contribute to relevant activities” and “what does not contribute to relevant activities” and provide some examples for reference • Section titled - ‘The activities need to contribute to the maintenance and enhancement of your knowledge, skills...’ would be better placed towards the start of this section.

Registration standard: Continuing professional development	
Guidelines: Continuing professional development (CPD)	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
9. Is there anything missing that needs to be added to the draft revised CPD guidelines?	SA Dental Service suggests the inclusion of an example of a CPD register and the inclusion under the definition section of CPD vs Add on Programs with suitable examples.
10. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?	SA Dental Service agrees that 5 year maximum period is appropriate – however consideration could be given to the following wording change “-This registration will be reviewed every 5 years, or as required, whichever occurs first.’
11. Do you have any other comments on the draft revised CPD registration standard?	Nil
12. Do you have any other comments on the draft revised CPD guidelines?	Nil

Registration standard: Recency of practice (ROP)	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
1. From your perspective how is the current ROP registration standard working?	SA Dental Service considers the current Recency of Practice (ROP) registration standard to be working.
2. Are there any state or territory-specific issues or impacts arising from applying the existing ROP standard that you would like to raise with the Board?	Nil
3. Is the content and structure of the draft revised ROP registration standard helpful, clear, relevant and more workable than the current standard?	SA Dental Service considers the current ROP registration standard format to be clear, suitable and relevant. Potential exists for the inclusion of a section indicating how the board may assess applicability of this standard.
4. Is there any content that needs to be changed or deleted in the draft revised ROP registration standard?	SA Dental Service believes the content of the ROP standard could be improved by a statement to clarify that the standard is not applicable to both undergraduates and postgraduates if applying for registration within 12 months of completing the course (if the postgraduate is not registering as a general dentist as well). There is a lack of clarity in the section titled “Evidence” additional information indicating what is required as evidence, minimum expectations or forms of evidence required to meet the standard would be beneficial. For example does “evidence” means proof of having practiced in the previous 5 years, or evidence of adherence to activities as set by the board?
5. Is there anything missing that needs to be added to the draft revised ROP registration standard?	See issue raised under dot point 3 & 4.
6. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not??	SA Dental Service agrees that 5 year maximum period is appropriate – however consideration could be given to the following wording change “-This registration will be reviewed every 5 years, or as required, whichever occurs first.’
7. Do you have any other comments on the draft revised ROP registration standard?	Nil

Registration standard: Endorsement for conscious sedation (CS)	
<i>Please provide your responses to any or all questions in the blank cells below</i>	
1. From your perspective how is the current CS registration standard working?	

Registration standard: Endorsement for conscious sedation (CS)	
<i>Please provide your responses to any or all questions in the blank cells below</i>	
	The Conscious Sedation (CS) registration standard has no application with in SA Dental Service, therefore are unable to comment upon the current workability of this standard. It is noted that the initial lack of clarity regarding the use of relative analgesia and it's applicability to the standard has been addressed and is included in the revised standard.
2.	Are there any state or territory-specific issues or impacts arising from applying the existing CS standard that you would like to raise with the Board?
	Nil
3.	Is the content and structure of the draft revised CS registration standard helpful, clear, relevant and more workable than the current standard?
	SA Dental Service considers the draft revised CS registration standard to be much clearer and relevant, the inclusion of additional information relating to the requirements for practice provide a greater level of information and clarity and align with the specialist standard.
4.	Is there any content that needs to be changed or deleted in the draft revised CS registration standard?
	Nil
5.	Is there anything missing that needs to be added to the draft revised CS registration standard?
	Nil
6.	Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?
	SA Dental Service agrees that a 5 year maximum period is appropriate – however consideration could be given to the following wording change “-This registration will be reviewed every 5 years, or as required, whichever occurs first.’
7.	Do you have any other comments on the draft revised CS registration standard?
	Nil

Registration standard: Specialist	
<i>Please provide your responses to any or all questions in the blank cells below</i>	
1.	From your perspective how is the current specialist registration standard working?
	SA Dental Service considers the current Specialist registration standard to be working.
2.	Are there any state or territory-specific issues or impacts arising from applying the existing specialist standard that you would like to raise with the Board?
	Nil
3.	Do you support the proposed changes to the existing standard as outlined in Option 2? (Why or why not?)
	SA Dental Service supports the proposed changes to the existing standard as outlined in Option 2 for the following reasons: SA Dental Service supports the change to having a voluntary general registration for specialists, on the understanding that the scope of practice will be restricted to the individual dental practitioners nominated speciality. SA Dental Service considers there is potential for fewer issues where dental practitioners would be practicing outside their restricted scope than recency of practice issues, although inclusion of points highlighted in the discussion paper would add value to the standard.
4.	Is the content and structure of the draft revised specialist registration standard helpful, clear, relevant and more workable than the current standard?
	SA Dental Service considers the structure of the standard to be suitable but could be enhanced with the inclusion of additional information identified in dot points 3 & 6.
5.	Is there any content that needs to be changed or deleted in the draft revised specialist registration standard?
	Nil
6.	Is there anything missing that needs to be added to the draft revised specialist registration standard?
	It is unclear (and not included in the draft standard) for practitioners that have a primary qualification not recognised by the board, but specialist education that is, if they can be registered as a specialist, but either not as a dentist (ie only practice within the scope of their recognised formal training), or which limited registration pathway is applicable (teaching/research or postgraduate training/supervised practice). This issue requires more clarification.

Registration standard: Specialist	
<i>Please provide your responses to any or all questions in the blank cells below</i>	
Also, as per the Act, specialists can also use the generic title Dental Specialist/specialist dental practitioner. Consideration should be given to the inclusion / clarification of this.	
7. Do you agree that the name of the specialty oral pathology should be changed to oral and maxillofacial pathology? (Why or why not?)	
SA Dental Service agrees with the name change as it more accurately reflects the regions addressed.	
8. Do you agree with the minor change to the definition of the specialty oral medicine as outlined? Why or why not?	
SA Dental Service agrees with the suggested change in definition of the speciality oral pathology as it is reflective of the key aspects of diagnosis which central to the role of a OMF pathologist.	
9. Do you agree with the change to the definition of the specialty of forensic odontology as outlined? Why or why not?	
SA Dental Service agrees with the suggested change in definition of the speciality of forensic odontology as it aligns with other accepted definitions.	
10. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?	
SA Dental Service agrees that 5 year maximum period is appropriate – however consideration could be given to the following wording change “-This registration will be reviewed every 5 years, or as required, whichever occurs first.’	
11. Do you have any other comments on the draft revised specialist registration standard?	
Nil	