



Public consultation on draft registration standards

July 2014

Responses to consultation questions

Please provide your comments in a **word document** (not PDF) by email to dentalboardconsultation@ahpra.gov.au by close of business on **14 July 2014**.

Stakeholder Details

Organisation name
Australian Dental Association (NSW Branch)
Contact information
Bernard Rupasinghe Email: bernardr@adansw.com.au

[Our responses to consultation questions appear on following pages.](#)

Registration standard: Professional indemnity insurance arrangements (PII)

1. From your perspective how is the current PII registration standard working?

ADA NSW supports the current PII registration standard. The current standard has worked well and, like the Board, we are not aware of any significant issues with the existing standard that would justify change other than the proposed changes to the language and structure of the standard to make it easier to understand.

2. Are there any state or territory specific issues or impacts that have arisen from applying the existing PII standard?

No.

3. Is the content and structure of the draft revised PII registration standard helpful, clear, relevant and more workable than the current standard?

ADA NSW is satisfied that the content and structure of the draft revised PII registration standard is helpful, clear, relevant and more workable than the current standard.

4. Is there any content that needs to be changed or deleted in the draft revised PII registration standard?

Not that we are aware of.

5. Is there anything missing that needs to be added to the draft revised PII registration standard?

Not that we are aware of.

6. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?

ADA NSW supports the Board's view that moving from a three year to five year period of review would help stabilise AHPRA's processes and procedures and help practitioners to better understand the obligations placed on them by the standard.

7. Do you have any other comments on the draft revised PII registration standard?

No.

**Registration standard: Continuing professional development
Guidelines: Continuing professional development (CPD)**

1. From your perspective how is the current CPD registration standard working?

Although the Board encourages registrants to accumulate CPD hours gradually (i.e. it expects them to engage in some CPD activities each year) many registrants are fulfilling their CPD requirements in the last 6–12 months of each three year cycle. This works against the purpose of, or helps defeat the goal of, CPD. The standard should more explicitly emphasise the need for a gradual accumulation of CPD points/hours over a three year period.

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?

No.

3. Is the content and structure of the draft revised CPD registration standard helpful, clear, relevant and more workable than the current standard?

Yes.

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)

ADA NSW supports the current 80/20 arrangement for the same reasons articulated by the Board. There are a variety of non-scientific or clinical courses available to dental practitioners (i.e. courses involving practice management) that are equally as important to a practitioner as clinical courses are and which also bring value to overall practice proficiency and patient wellbeing.

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)?

Yes.

6. Is there any content that needs to be changed or deleted in the draft revised CPD registration standard?

No.

7. Is there anything missing that needs to be added to the draft revised CPD registration standard?

No.

8. Is there any content that needs to be changed or deleted in the draft revised CPD **guidelines**?

No.

9. Is there anything missing that needs to be added to the draft revised CPD **guidelines**?

No.

10. Do you think that a review period of at least every five years (rather than three) is appropriate?

Registration standard: Continuing professional development
Guidelines: Continuing professional development (CPD)

Why or why not?

ADA NSW supports a review period of at least every five years. We believe most practitioners are compliant with the Standard and are keen to engage in continuing professional development activities. Moving from a three year to five year period of review will help stabilise AHPRA's processes and procedures and help practitioners to better understand the obligations placed on them by the standard.

11. Do you have any other comments on the draft revised CPD registration standard?

No.

12. Do you have any other comments on the draft revised CPD **guidelines**?

No.

Registration standard: Recency of practice (ROP)

1. From your perspective how is the current ROP registration standard working?

The current ROP standard appears to be working well.

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?

No.

3. Is the content and structure of the draft revised ROP registration standard helpful, clear, relevant and more workable than the current standard?

Yes. We accept the rationale provided by the Board for proposed changes to be included in the revised ROP registration standard.

4. Is there any content that needs to be changed or deleted in the draft revised ROP registration standard?

No.

5. Is there anything missing that needs to be added to the draft revised ROP registration standard?

No.

6. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not??

Yes. Moving from a three year to five year period of review will help stabilise AHPRA's processes and procedures and help practitioners to better understand the obligations placed on them by the standard.

7. Do you have any other comments on the draft revised ROP registration standard?

No.

Registration standard: Endorsement for conscious sedation (CS)

1. From your perspective how is the current CS registration standard working?

ADA NSW is not aware of any issues to suggest the current CS registration standard is not working as it should. We support the proposed changes however on the basis that these will improve clarity and consolidate all relevant/important information into the one document.

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?

No.

3. Is the content and structure of the draft revised CS registration standard helpful, clear, relevant and more workable than the current standard?

Yes.

4. Is there any content that needs to be changed or deleted in the draft revised CS registration standard?

None that we are aware of.

5. Is there anything missing that needs to be added to the draft revised CS registration standard?

Not that we are aware of.

6. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?

Yes. Moving from a three year to five year period of review will help stabilise AHPRA's processes and procedures and help practitioners to better understand the obligations placed on them by the standard.

7. Do you have any other comments on the draft revised CS registration standard?

No.

Registration standard: Specialist

1. From your perspective how is the current specialist registration standard working?

The current specialist registration standard would appear to be working well except in relation to recruitment of specialists from overseas to fill academic staff positions.

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?

No.

3. Do you support the proposed changes to the existing standard as outlined in Option 2? (Why or why not?)

Yes.

1. Specialists should be required to have qualifications which entitle them to register as general dentists in Australia (i.e. in addition to their qualifications for specialist registration);
2. Specialists applying for renewal of registration as a dental specialist should not have to maintain their registration as a general dentist if they do not wish to;
3. There are significant risks involved in registering a specialist practitioner who is not qualified for general registration as a dentist, especially in relation to clinical competency and an appropriate understanding of Australian regulations and practice;
4. Although there may be some benefit in registering a specialist who is not qualified for general registration as a dentist, these do not outweigh the perceived risks, especially in relation to impacts on public safety (*note: see our exception in question 6 below*);
5. Generally speaking, it is felt there is little benefit to be gained by requiring specialist practitioners to maintain registration as a general dentist where that specialist wishes to narrow his or her scope of practice to provide dental care only in their area of specialisation.

4. Is the content and structure of the draft revised specialist registration standard helpful, clear, relevant and more workable than the current standard?

Yes.

5. Is there any content that needs to be changed or deleted in the draft revised specialist registration standard?

No.

6. Is there anything missing that needs to be added to the draft revised specialist registration standard?

The current specialist registration standard would appear to work well except in relation to the recruitment of specialists from overseas to fill academic staff positions.

A requirement that overseas trained specialists who are recruited to fill academic positions in Australia must also be registered as a general dentist has created unnecessary problems making it extremely difficult in some cases to fill these teaching positions with suitably qualified applicants.

Consideration might be given to excluding this requirement for overseas trained specialists who are recruited to fill academic positions in Australian universities.

Registration standard: Specialist

7. Do you agree that the name of the specialty oral pathology should be changed to oral and maxillofacial pathology? (Why or why not?)

Yes.

8. Do you agree with the minor change to the definition of the specialty oral medicine as outlined? Why or why not?

Yes.

9. Do you agree with the change to the definition of the specialty of forensic odontology as outlined? Why or why not?

Yes.

10. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?

Yes. Moving from a three year to five year period of review will help stabilise AHPRA's processes and procedures and help practitioners to better understand the obligations placed on them by the standard.

11. Do you have any other comments on the draft revised specialist registration standard?

No.