

To The Dental Board

I support the proposed changes revised Scope of Practice Registration Standard and Guidelines for Scope of Practice.

As a current practising dual registered Dental Therapist and Oral Health Therapist working within public health, I believe the proposed changes reflect the current best practice for referral pathway based oral health care for all Australians.

All dental practitioners are aware of the need to work within their personal scope and it is not good practice to have an individual scope limited by an employer due to the current ambiguous wording around structured professional relationships.

Referral pathways should take into account the best opportunity for optimal oral health for all. This should be encouraged by dentists referring to hygienists and OHTs, OHTs referring to GP dentists as well as specialists such as periodontists, paedodontists, oral medicine specialists and orthodontists. There is no need for dentists to control referral pathways as this adds an unnecessary layer to care for patients, can delay urgent specialist care and limits the scope of other practitioners.

I believe this proposal will bring dentistry into line with other registered health practitioners such as:

- physiotherapist-GP-orthopaedic surgeon pathway
- GP-midwife-obstetrician-maternal foetal specialist care model
- Physiotherapist-speech therapist-occupational therapist-psychologist referral pathways

The proposed scope of practice reflects MY personal working relationship where as an OHT I have the autonomy to exam, assess, diagnose, treat, review and refer. This should be the working environment for all who feel their individual scope of practice allows each step of this optimal patient care.

I and my OHT colleagues also pay for our own indemnity insurance, continuing professional development requirements and AHPRA registration – all hallmarks of allied health professionals with autonomy and trust to work within scope.

Questions for consideration

In addition to your general feedback, the Board is seeking your views about the preferred proposal outlined above. Please consider the following questions:

1. From your perspective, how is the current registration standard and guidelines working?
 - The current wording is ambiguous and non-reflective of the current quality and well-rounded education and training of Oral Health Therapists.
2. Are there any issues that have arisen from applying the existing registration standard and guidelines?
 - Scope limitation by Dentists who prevent OHTs from using their training to the fullest. This is due to a misinterpretation of the 'supervision' and 'structured

professional relationship' meaning dentists believe they can dictate the work OHTs perform.

- Misinterpretation of Independent Practice- some Dentists believe that means OHTs cannot work without a dentist on site while others interpret it as not able to own a dental practice. This is a huge variation on interpretation of the term.
3. Is the content and structure of the proposed revised registration standard and guidelines helpful, clear, relevant and more workable than the current registration standard and guidelines?
 - Yes
 4. Is there any content that could be changed or deleted in the proposed revised registration standard and guidelines?
 - No
 5. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?
 - Yes. It can take many years for workplace structural changes to occur once a new standard is put in place. Three years can be too soon for further changes.
 6. Do you have any other comments on the proposed revised registration standard and guidelines?
 - No
 7. Is the content and structure of the new reflective tool helpful, clear and relevant?
 - Yes
 8. Is there anything missing that needs to be added to the new reflective tool?
 - No

To reiterate, I support the changes to scope of practise registration standard.

Kind Regards,

Jodie Burton

- Registration number: DEN0001675170
- Status: Registered
- Registration expiry date: 30/11/2018
- Division/ Registration Type: Dental Therapist, General
Oral Health Therapist, General