

Public consultation on a proposed revised *Scope of practice registration standard and Guidelines for scope of practice*

September 2018

Australian Dental Association template submissions with examples

The Dental Board of Australia's (the Board) public consultation paper on a proposed revised *Scope of practice registration standard and Guidelines for scope of practice* opened for submissions on 22 March 2018 and closed on 14 May 2018.

As part of this public consultation process, the Board received over 1100 submissions. Among the individual submissions received, over 400 submissions (listed below) used an Australian Dental Association template ([Attachment A](#)) and included examples of lived experiences. These examples were intended to demonstrate the perceived risk of an adverse or unfavourable outcome to a patient in the event a structured professional relationship was not in place.

These submissions also contained personal information that gave rise to significant privacy concerns and therefore the Board has not published those individual submissions on its website. The Board has published this summation to provide a collective insight into the dominate issues raised by this group of submissions.

Summation of issues

These are:

- changes mean that dentists would be removed as the leader of the dental team which would place the public at risk
- expression of variations of the sentiment "You don't know what you don't know" as applicable to dental hygienist (DH), dental therapist (DT) and oral health therapist (OHT) and dental prosthetists (DP)
- where it is claimed that removal of the structured professional relationship between DH, DT and OHT's and dentists degrade the team concept that underpins dentistry
- the proposals creates a public risk from DH, DT and OHT's who do not have the education and training to recognise and manage complex clinical situations, including patients with complex medical conditions
- allowing independent decision making and autonomous practice provisions will result in treatment planning that is not comprehensive
- concerns about DH, DT and OHT's harming patients where performance is either below standard reasonably expected and/or outside scope of practice and not trained to perform and thereby placing patients at risk
- concerns about DH, DT and OHT's performance such as failing to adequately assess/diagnose which may require referral to dentist/medical practitioner for further investigation and diagnosis.

- members of other dental divisions are not trained in advanced diagnostic (do not have the knowledge to interpret and diagnose more complicated disease manifestations) or treatment planning
- members of other dental divisions may not recognize the signs of oral cancer
- members of other dental divisions do not have advanced trauma skills
- members of other dental divisions may not make or inappropriately refer patients to specialist, dentist or other health practitioners
- members of other dental divisions may make adverse treatment outcomes involving periodontal care or removal of caries/decay
- assertions that some dental prosthetists have made and will make dentures for unhealthy mouths with untreated dental disease
- dentists are frequently approached by workplace DTs, DHs and OHT's for assistance in the diagnosis of dental disease, developmental dental anomalies and radiographic interpretation
- members of other dental divisions do not possess sufficient competence to self-assess their own individual scope of practice
- some dentists lack knowledge and understanding of capabilities, understanding and experience of working with dental practitioners from other dental divisions
- general lack of acceptance of the professional status of other dental divisions and often referring these divisions as allied dental practitioners or mid-level providers
- patients will experience difficulty in identifying the qualifications of their treating dental practitioners resulting in confusion or delayed treatment
- members of other dental divisions are not eligible to have a Medicare provider number to enable processing of Medicare, Veteran Affairs and private health insurance claims for professional services rendered
- members of other dental divisions are not authorised by state and territory authorities to prescribe prescription medicines and in some jurisdictions are subject to holding or administering medicines under the authority of an authorised dentist
- members of other dental divisions are not eligible to have a prescriber number to enable access to the Pharmaceutical Benefits Scheme
- members of other dental divisions are not authorised to prescribe sedation through any route of administration
- unintended consequence of the dissipation of the oral and dental therapist workforce away from areas of need through commercial mechanisms
- greater potential for members of other dental divisions to hold out as dentists or specialists
- perceived over supply within the dental workforce
- speculation on the potential adverse business models that may members of other dental divisions

List of Submissions

Abdioglu, Hannah	Celine, Gregory	Dutta, Subin
Abood, John	Chandraweera, Lahiru	Easaw, Rebecca
Abu-glam, Sarmad	Chen, Becky	Eckersley, Narelle
Aijaz, Ayesha	Chen, Tiffany	Eighani, Shayan
Alic, Flaviu	Chew, Tallan	Eupene, Kerry
Amin, Alan	Chia, Minyen	Evans, Scott
Anastassiadis, Poppy	Chia, Sean	Farmer, Alistair
Andreasen-Cocker, Daniel	Chiang, Christina	Fast, George
Andritsakis, T	Chin, Eu Li	Fenton, Judith
Anonymous x 26	Chintala, Guru	Finnegan, Ed
Aouad, Dominic	Chiu, Kandy	Foster, Imogen
Arndt, Philip	Chou, Bradley	Freelander, Andrew
Atkin, Steve	Chou, Philip	Freeman, Ashley
Ayad, Noorhan	Chow, Stephanie	Freer, Alannah
Azher, Simra	Christensen, John	Frizzo, Neil
Back, Michael	Chui, Sin Ting	Fung, C
Bakouris, Peter	Chung, Andy	Furdas, Hanya
Baksi, Sanjana	Clarkson, Richard	Furlan, Carmelia
Barker, Kelsey	Clausianos, Maria	Gamsu, Samuel
Barlow, Lachlan	Cohen, Matthew	Gan, R
Barrett, Alice	Collins, Katherine	Gannon, Orla
Bartley, Steven	Cordato, Mark	Gerke, Dale
Bayer, Nelson	Crofts, Timothy	Gibbins, Robert
Beaman, Tarana	Cui, David	Gidaro, Samuel
Behari, Asheen	Culwick, Andrew	Goh, Ryan
Bennett, Colin	Curnow, David	Goh, Shaun
Bhasin, Vlkas	Currier, Erin	Gonzalez, Edelmiro
Bhatia, Nirav	Daley, Amy	Goodyear, Faye
Bhatnagar, Udit	Darbyshire, Judith	Grace, Petronilla
Bladen, David	Darshana, Indiketiya	Gregory, Peter
Blake, Peter	Davis, Frank	Gubbins, Alice
Borgnolo, Ron	Day, Jennifer	Guo, Ying
Boroky, Jane	De Souza, Stephanie	Gupta, Shrinkhla
Boulton, Edward	Dean, Allison	Ha, Lisa
Bowyer, Desmond	Dellar, Alison	Hadzakis, Desi
Bozanic, Matt	Devellerez, Alex	Hallet, Kerrod
Brown, Louise	Devine, Colleen	Halstead, Amber
Brzezniak, Christine	Devlin, Brian	Hardwicke, Chris
Buckeridge, Anna	Dilger, Stephen	Harper, Peter
Burgess, Kate	Dixon, Paul	Hayek, Saif
Caldwell, Patrick	Do, Linda	Hazlewood, Robert
Campbell, Fioan	Dodd, Nicole	Helen
Cardato, Mark	Dreyer, Craig	Henning, Gisele
Carmichael, Graham	Drummond, Nehal	Heredia, Ruth
Caroline	Duke, Peter	Ho, Junyi
Carrigy, James	Dutt, Nikhil	Ho, Ly

Hoang, Peter Duc	Le Tat, Thuc An	Murray, Daniel
Hobeika, Carmen	Lee, Bingwei	Nakahashi, Kent
Hong, Andrew	Lee, Daniela	Narayana, Tharaka
Hooper, Gerard	Lee, Doug	Nawrot, Genevieve
Hooper, Gerard	Lee, Jane	Nawrot, Louise
Hopkins, Sian	Lee, Tony	Newberry, Ashleigh
Hsu, Alan	Leishman, Doug	Ng, Pamela
Huang, Caitlyn	Levyt, Bryan	Ng, Sook
Huang, James	Li, Anna	Nguyen, Amanda
Huupponen, Wesley	Liang, Chuwei	Nguyen, Caroline
Hymer, Agim	Liao, Robert	Nguyen, Jenny
Irwin, Gina	Liddelow, Glen	Nguyen, Margaret
Jankie, Jeffrey	Liew, Stephen	Nguyen, Stephanie
Javadi, Simon	Lim, Alyssa	Nguyen, Tan George
JC	Lin, Annie	Nguyen, Thi
Jensen, Arna-Lee	Liu, Justin	Nguyen, Trang
Jo, Edward	Liu, Mandy	Nichols, G
Jo, Nada	Lo, Ting-Shi	Nikgo, Arash
Jou, Angela	Locke, Andrei	Norris, Jeremy
Joudeh, Linah	Louis, Nathan	Norton, Peter
Joudeh, Linah	Luong, Amy	Nunes, Jose
Jung, Jay	Lynch, Vicki	Ong, Peter
Kam, Elizabeth	Ma, Cynthia	O'Sullivan, Finbarr
Kankotiya, Hareesh	Macsood, Zach	Palesy, Peter
Kashchuk, Victoria	Maher, Dominic	Patel, Ashish
Kataria, Nupur	Makhmalbaf, Pantea	Patel, Dilan
Kavanagh, Jim	Maloney, Denver	Patel, Jilen
Keir, David	Maloof, Clem	Patney, Melanie
Kelagher, Anthony	Mandikos, Michael	Pedram, Sandra
Kenny, Chanel	Mandikos, Sarah	Peters, Samantha
Kerr, Alexandra	Mangisetty, Sucharitha	Phan, Nathan
Keys, James	Marinovic, Peter	Phillips, Christopher
Keys, Timothy	McCloy, Russell	Pilgrim, Kate
Khadembaschi, Sheyda	McKenna, Heidi	Pisharodi, Adarsh
Khan, Arbab	McKenna, Katy	Pohl, John
Khan, Sherry	McMullen, Sarah	Poon, Joseph
Khominsky, Alexander	McQuillan, Andrew	Pope, Oliver
King, Susan	Meaney, Patrick	Porter, Claire
Koh, Cherly	Megson, Emma	Porzig, David
Kolsky, Jordan	Megta, J	Prabhu, Sonali
Kong, Charlie	Mewing, Robert	Puljich, Anthony
Koppen, Jadana	Mickenbecker, Paul	Quail, Deborah
Kulkarni, Sujatha	Miller, Greg	Restifo, Rosemary
Kumar, Kiran	Miller, Marc	Robbins, Daniel
Kumar, Shymal	Moon, Hye	Robinson, Bruce
Kwan, Deborah	Moran, Jeremy	Rodan, Beverley-Anne
Lagos, Tas	Morris, Christina	Rogan, Emma
Lam, Buuloc	Moule, Alex	Rogers, Jonathan
Lam, Patsandra	Mowat, Mark	Rogers, Rob

Rowett, Nathanael
Saberi, Siamak
Salvestro, Denise
Salwan, Geetanjali
Sanghvi, Gitika
Santosa, Robert
Scarpin, Karl
Seow, Benjamin
Shaibani, Mehran
Shams, Michael
Shasri, Shaneel
Sheppard, Samuel
Sherson, Wayne
Shiyab, Sawsan
Shooter, Kerry
Sidhu, Gurpreet
Singh, Arshia
Smerdon, Anthony
Smith, Connor
Smith, Kate
Soh
Sommers, Nikki
Sood, Nishi
Speirs, Scott
Spencer, Mark
Stein, Anyda
Steinberg, Linda
Stender, Elvira
Sternsen, Jeremy
Stuhmcke, David
Sudame, Achala
Sun, Ruoyao
Surapaneni, Theja
Suyu, Eugene
Syed, Mahnaz
Synnot, Timothy
Szeto, Josephine
Tan, Timothy
Tara, Rajiv
Tarraf, Nour
Telfer, Sukanya
Teoh, Wei Tzen
Teoh, Yu-Yao
Theagesan, Kavita
Thean, Les
Thind, Harpreet Kaur
Thomas, Gregory
Tin, Win
Tjio, Wei-Hun
To, Michael
Toroghi, Amir
Tran, Katie
Tran, Victor
Tsang, Janet
Twigge, Eugene
Tyler, Aileen
Veeran, Colin
Verma, Ramnish
Vickers, Daniel
Vinci, Anthony
Viviers, Martin
Voruganti, Kalyan
Wadhawan, Ankit
Wang, Davy
Wang, Jenny
Ward, Justin
Wareham, Annabelle
Webster, Kelly
Whang, Alice
Whitmore, Sally
Wilding, Nicholas
Williams, Rebecca
Wing, George
Winters, John
Winters, Louise
Wong, Benedicta
Wong, Isaac
Wong, Julene
Wong, Patricia
Wynne, Susan
Xiao, Jeffrey
Yang, Dongi
Yang, Jimmy
Yap, Lillian
Yassa, Elham
Yazdani, Payam
Yean, Howard
Yeh, Tony
Yong, David
Yu, Elizabeth

Dr John Lockwood
Chairman, Dental Board of Australia

Re: Scope of Practice Public Consultation

I write to express deep concern over the Dental Board's proposed changes to the Scope of Practice Registration Standard. In my view, the proposed changes pose a significant risk to patients and undermine the foundations of the dental team.

Further, it is clear to me that the proposed changes have been considered in isolation and neglect to consider the broader context. Any changes to Scope of practice must also consider the legal limits to practice and the minimum competency set of all dental practitioners.

I wholeheartedly support the positions of the Australian Dental Association in its submission and while I will not reiterate those points I have provided examples of real-world situations where had a structured professional relationship not been in place, there was a risk of adverse or unfavourable outcomes to a patient.

[Use this space to provide examples of how being in a structured professional relationship prevented an adverse outcome for a patient. Below are some examples of situations you might have encountered. You should feel free to write as many examples as you wish and alter the format or length of this submission to best reflect your own views.]

- Where you doubted the ability of an allied dental practitioner to assess their own competency when they planned to perform a treatment and you had to intervene.
- Where an allied dental practitioner sought your professional input prior to treatment to ensure a positive outcome and minimise risk to the patient.
- Where an allied dental practitioner missed something critical and you had to intervene to ensure best outcomes for the patient.
- Where an allied dental practitioner has performed treatment you considered inappropriate or beyond their scope and had to intervene or re-do work.
- Where an allied dental practitioner was over or under conservative in their treatment approach and you had to adjust a treatment plan, intervene, or redo work.

I trust that these examples demonstrate a clear case for retention of the structured professional relationship and retain the requirements of 'independent practitioner'. This will ensure that the best, quality dental care is provided safely to the Australian public. I strongly support maintaining the status quo (Option One) as laid out in the consultation.

Regards,