

From: [REDACTED]
To: [dentalboardconsultation](#)
Subject: Feedback concerning scope of practice registration standard and guidelines
Date: Tuesday, 18 June 2013 8:15:55 PM

Dear Sir/Madam

I wish to express my concern at the following proposal on page 19

Use of CBCT

You need to be very clear about the difference in ***prescribing a diagnostic image*** or ***taking a diagnostic image on the request of a someone licensed to prescribe***. I reject that Cone Beam Computed Tomography (CBCT) should or could be **prescribed** by a dental hygienist, dental therapist, oral health therapist or a dental prosthetist given their limited or largely absent training in the following:

1. Cone Beam Computed tomography employs higher radiation dosages compared with standard 2D imaging modalities. An issue concerning the appropriate referral of patients for these images, particularly in children, has already been raised in Australia and overseas.
2. ***Cone Beam Imaging is predominantly utilized in the evaluation and treatment planning of advanced clinical cases*** including: implant placement/planning, localization and surgical removal of impacted teeth, complex endodontic cases, evaluation of degenerative changes of the temporomandibular joints, evaluation of the paranasal sinuses, assessment of the airways and to exclude bony/cystic/odontogenic pathology. This lies well outside the scope of practice of the oral health professionals listed above. In my daily practice as a specialist radiologist, these images are rarely prescribed outside these indications and Cone Beam Imaging is not a substitute for routine 2D imaging. As such, ***prescription of Cone Beam Computed Tomography should remain the responsibility of the dentist.***
3. Allowing the above professionals to prescribe diagnostic images is also in contravention of radiation legislation in several states, whereby the prescription of diagnostic imaging is currently limited to dentists.

I would respectfully request that the Dental Board of Australia limit the prescription of Cone Beam Computed Tomography to the "team leader" - the dentist or dental specialist.

Yours faithfully

Dr Alison Butt BDS, DClinDent (DMFR)

