

## List of template submissions

### Scope of practice registration standard consultation (closed 19 June 2013)

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The following submissions were based on template letters which were broadly similar to the sample provided.

#### List of Submissions

Aaron	Balraj, Shobini
Abbas, Sarmad Ali	Bang, Geon wung
Abdulkhak, Namik	Bang, Ji Wung
Abdulkareen, Ali	Bankowski, James
Abood, John	Barberi, Anthony
Abrahams, Barry	Bardolia, Shivaan
Acton, Caroline	Barlow, Lachlan
Adams, Kerry	Barry, Corbin
Ahn, Junyoung	Basrur, Akshay
Allchurch, Stuart	Basstt, Aleisha
Allen, Rose	Bav, Estie
Allsopp, Fred	Baveas, Nick
Allsopp, Rhea	Beazley, Kiara
Al-Shafi, Safa	Beddow, Thomas
Amin, Negin	Bell, Richard
An, Jing Hong	Ben
Anderson, Melissa	Bennett, Zachary
Anonymous x 44	Bermani, Ayad Al
Anwar, Asef	Bhatia, Nirav
Arora, Nikhita	Bhula, Rakesh
Asenstorfer, Laura	Bigelow, Ryan
Ashton, David	Bo, Wang
Askern, Richard	HOH Dental
Athale, Adi	Bottomley, Georgia – Not of Publication
Atlihan, Cihad	Bourke, Kath
Attia, David	Bou-Samra, Gabrielle
Attia, Jonny	Bowden, Petrina
Auld, James	Bowes, Christopher
Ayad, Nehal	Bowes, Michael
Azadi, Saeedeh	Braden, Jodie
Azami, Zohal	Brady, Marc
Azher, Hirra	Bragg, Rebecca
Azher, Nimra	Briggs, Damian
Azher, Simra	Brooks, Alyssa
Azzam, I	Buckley, Patricia
Bagga, Hashmita	Buckley, Scott
Bahnam, Sara	Bui, Paul
Baidya, Renu	Bulsara, Vishal
Baker, Matthew	Burberry, Brittany
Ball, Thomas	Burger, Eli

Cameron, Sarah  
Campbell Alister  
Campbell, Fiona  
Carlaw, Jacqueline  
Carter, Ava Elizabeth  
Chan, Andrew  
Chan, Jovena  
Chan, Theodore  
Chan, Yi, May  
Chan, Yi  
Chapman, Andrew  
Chavan, Apoorva  
Cheah, Christine  
Chee, Shelley  
Chen, Angela  
Chen, Emily  
Chen, Gilbert Chun-Han  
Chen, Ken  
Chen, Klein  
Chen, T  
Chen, Tiffany  
Chen, Ting Ting  
Chen, Berenice  
Cheng, James  
Cheng, Natalie  
Cheng, Yiu  
Cheok, Patrick  
Cherloaba, Tabitha  
Cherukuru, Prasanthi  
Cheung, Monique  
Cheung, Samuel  
Chew, Melissa  
Chiang, Timothy  
Chiew, Vanessa  
Childs, Jenna  
Chin, Aaron  
Ching, Lai  
Chiu, Gina  
Chiu, James  
Cho, Brian  
Cho, Hyun, Jong  
Choi, In Hee  
Choi, Michael  
Chong, Daphne  
Chong, Sarah  
Chou, Philip  
Chou, Ryan  
Chow, Rosetta  
Chow, Tommy  
Chow, Vania  
Choy, Vincent  
Chu, George  
Chu, Huang-Wei  
Chu, Timmy  
Chuang, Jeni  
Chuang, Jessica  
Chui, Sharon  
Chung, Anthony  
Chung, Gihun  
Clarkson, Roger  
Clive, Paul  
Close, Paul

Collins, Katherine  
Commins, Noel  
Cordery, Christine  
Cornwall, Katherine  
Costello, Maurice  
Cox, Julie  
Cruickshank, Edward  
Cull, Mark  
Dang, Liem  
Daniels, Justin  
Darvish, Anahita  
Davidson, Trent  
Dawoud, Nader  
De Silva, Shamalka  
Deall, David  
Dean, Cory  
Dear, William  
DePaizzi, Christina  
Deshpande, Suhas  
Deshpande, Suman  
Devlin, Miles  
Dhanji, Aly  
Dhanji, Marisha  
Dick, Roslyn  
Dickenson, Maeghan  
Dilley, Stevie  
Diviach, Angela  
Do, Dale  
Do, Stephen  
Doan, Laurence  
Doig, Rebecca  
Doupe, Laurie  
Downes, Alison  
D'souza, Zen  
Dubbeldam, Bryan  
Dubios, Kate  
Dudgeon, Stephen  
Dudhia, Raahib  
Duhra, Rickdeep  
Duke, Rebecca Louise  
Duong, Vu  
Durham, John  
Duval, Craig  
Dzankovic, Amira  
Earl, Mark  
Edmeades, William  
Efsathis, Peter  
El-Azzi, Matthew  
El-Bacha, Charbel  
El-Khoury, James  
Ellenberger, Samantha  
Elliot, Mark  
Ellis, Vyla  
Elston, Steven  
El-Titi, Mohammad  
Emma 2  
Etheridge, Kaeli  
Evans, Alana  
Evans, William  
Evelyn  
Evens, Robert  
Ewing, David

Fahey, Nina  
Fahey, Yvette  
Fan, Daniel  
Fan, Yun Schian  
Fang, Yan  
Farhandi, Sally  
Faris, N  
Fenogilio, Hannah  
Ferlitio, Isidoro  
Fiore, Kate  
Fiore, Steven  
Fisher, Rachelle Jane  
Fitzpatrick, Brendan  
Fitzpatrick, Brian  
Fogg, Kylie  
Ford, Daniel  
Forrest, Alex  
Franklin, Ann  
Franzmann, Peter  
Freeman, Rob  
Fu, David  
Fu, Kevin  
Furniss, Lily  
Gan, Jennifer  
Gan, Jin  
Ganashan, Neru  
Gandu, Kumar  
Gang, Buyeong  
Gao, Jie  
Garcia, Mariluz  
Garraway, Stuart  
Georgy, Ramy  
Gerardis, Marie  
Gertsch, Darren  
Ghita, Cornelia  
Gohbrial, Isabel  
Gohbrial, Michael  
Go, Yvonne  
Godsall, Georgina  
Goh, Kenneth  
Goh, Vincent  
Goodwill, Michael  
Goodyear, Faye  
Gopinath, Adarsh  
Gover, Ken  
Greer, Peter  
Groenlund, Catherine  
Guiguais, Jacob  
Gulati, Shruti  
Gulvady, Shweta  
Gunaridis, Polichronis  
Gunawardana, Dilantha  
Gunawardana, Diluni  
Gupta, Shilpa  
Haghir, D  
Hakmana, Dulani  
Halstead, Amber  
Hambali, Safinah Hidayati  
Hamilton, Adam  
Han, Alice  
Han, Lucy  
Han, Sang

Hanly, Timothy  
Hanna, Victor  
Harichandran, Ramesh  
Harper, Keith  
Harris, Michael  
Harvey, Danielle  
Haselton, Olivia  
Hazlewood, Rob  
Heah, Elwynn  
Henderson, Kim  
Hernandez, Alle  
Herriot, Stephen  
Hetrelezis, Daniel Craig  
Hew, Eric  
Higgins, Andrew  
Hirst, Julian  
Hirunviviati, Sally  
Hislop, Jeff  
Hmud, Aus  
Ho, Bernadette  
Ho, Hung Sang  
Ho, Kevin  
Ho, Nevina  
Ho, Philip  
Ho, Sang  
Ho, Timothy  
Hoang, Jennifer  
Hodgson, Eliza  
Hoe, Annabel  
Hoffman, Adrian  
Holmes, Daryl  
Hong, Jenny  
Hossen, Ken  
Houston, Edward  
Howe, Gordon  
Hsieh, Jen-Ti  
Hsieh, Susan  
Hsu, Alan  
Hsu, Rita  
Hu, Jia Ying  
Hu, Wendy  
Hua, Andy  
Huang, Albion  
Huang, Cocoa  
Huang, Johnson  
Huang, Kuo-Jie  
Huang, Qi  
Huang, Sue  
Huang, Yuan-I  
Hui, Maria  
Hui, Roy  
Hui, Selena  
Hulme-Peake, Gregory  
Hurrell, Kristina  
Hussain, Rami  
Huynh, Abella  
Huynh, Dang Huy  
Huynh, Mimi  
Huynh, William  
Hvhua, David  
Hwin, Paul Jay  
Ingilizian, Sebouh

Ip, Andrew  
 Ip, Chee wei Victoria  
 Iskander, Rick  
 Itskovich, Yana  
 Jabbour, Les  
 Jackson, Carolina  
 Jacob, Hisha  
 Jacob, Kerin  
 Jacob, Sidharth  
 Jaitlee Aarti  
 Jalota, A J  
 Jankovic, Ksenija  
 Javadi, Simon  
 Jayaratne, Samathi  
 Je, Da Jeong  
 Jee, Seon Ah  
 Jeong, Eerica  
 Jess  
 Jettey, WJ  
 Jeyaratnam, Michelle  
 Jiang, Jonathan Luning  
 Jo, Edward  
 John, Keziah  
 Jonzdoz-Hector, Bayardo Hartell  
 Joo, Daniel  
 Joshi, Simran  
 Jovanovic, Christina  
 Julianto, Valeria  
 Jun, Kahee  
 Jung, Kate Chan Hee  
 Jung, Yejin Julia  
 Junner, Robert  
 Kahler, Bill  
 Kalra, Amiy  
 Kalra, Ravinder Kaura  
 Kamisetty, Ravi  
 Kang, Anna  
 Kanwar, Nupur  
 Karbasi, Maryan  
 Karunaikumar, Darian  
 Kassim, Burhaan  
 Katuri, C  
 Kaur, Ramadeep  
 Ke, Judy  
 Keir, David Michael  
 Kent, Tahnae  
 Kerr, Jon  
 Kershaw, Holly  
 Kershaw, Nicholas  
 Ketteridge, Michael  
 Keys, David William  
 Keys, James E  
 Keys, Timothy  
 Khalessi, Ali  
 Khamtanh, John  
 Karoofa, Nora  
 Khider, Dunia  
 Kieu, Khoa  
 Kim, Andrew Y  
 Kim, David  
 Kim, Grace  
 Kim, Hye-In  
 Kim, Hye-Sang  
 Kim, Ju  
 Kim, Michael  
 Kim, Ming Jung  
 Kim, Minji  
 Kim, Seul-Chan  
 Kim, Youngjoo  
 Knowles, Claire  
 Knowles, L  
 Knowles, Lesley  
 Koh, Rongzhen  
 Koh, Su Seang  
 Kong, Raymond  
 Koo, Diana  
 Kottege, Naomi  
 Kou, Hei Chon  
 Kourtesis John  
 Krishna, Vidya  
 Kurnaz, Fatima  
 Kwek, Sharon  
 Kwon, Eun Ju  
 Lagemann, Manfred  
 Lagos, Tara  
 Lai, Sandeep  
 Lakshimi, Suri  
 Lalla, Sanjivanee  
 Lalla, Yashoma  
 Lalla, Yastira  
 Lalovic, Daniela  
 Lamantia, Michael  
 Lanigan, Sarah  
 Lau, Jason  
 Lau, Mabel  
 Lavorato, Michael  
 Lay, Pollyanna  
 Lazarou, Anthony  
 Le, Leslie  
 Le, Minh Tam Alex  
 Le, Quan  
 Le, Tam  
 Le, Timonthy  
 Le, Tu  
 Leask, P D  
 Lee, Christie  
 Lee, Christina  
 Lee, Daniella  
 Lee, Derek  
 Lee, Ealin  
 Lee, Hee Jae  
 Lee, Hyun Ju  
 Lee, Jefferson  
 Lee, Jihun  
 Lee, Joseph  
 Lee, Nelson  
 Lee, Rachel  
 Lee, Raymond  
 Lee, Richard  
 Lee, Suzanna  
 Lee, Tyng-Tyng  
 Lee, Veronica  
 Lee, Wei  
 Lee, Yujin

Leigh, Julian  
Lenz, Gavin  
Leong, Anthony  
Leong Shu Ying  
Leung, Helen  
Leung, Henry  
Lewis, K  
Li, Anna  
Li, Da  
Li, Kenneth  
Li, Xueyao  
Liao, Robert  
Liao, Tzu-Lin  
Lien, Olivia  
Lim, Bruno  
Lim, Elaine  
Lim, Joee  
Lim, Ming Xun  
Lim, Ming  
Lin, Carson  
Lin, Clare  
Lin, David  
Lin, Holly  
Lin, Judy Yi-Hsuan  
Lin, Matthew  
Lin, Michael  
Lin, Robert  
Lin, Sandy  
Lin, Trudy  
Linton, Xavier  
Liting, Wu  
Little, Gerald  
Liu, Mary  
Livanawadu, Praveen  
Liyanagama, Dineeth  
Lo, Louis  
Lo Ting-Shi  
Loh, Alex  
Loh, Li Jia  
Lorchin, Haley  
Lowe, Ena  
Luu, Danny  
Ly, Austin  
Ly Hoang, Nhan  
Ma, Ben  
Ma, Christine  
Ma, Cynthia  
Ma, Jamie  
Mahdavi, Elham  
Makhamalhaf, Pantea  
Makhdoom, Mohd  
Maki, Hasan  
Malek, Marc  
Malesu, Anish  
Mansour, Ezzat  
Mansour, Samia  
March Randall W  
Marchmount, Robbie  
Marcus, Daniel  
Mahfour, Kat  
Marks, Jenny  
Marks, Nicola

Marriot, David  
Marsden, David  
Marshall, Emma  
Martin, Ross  
Master, Denny  
Matar, Jad  
Matthew  
McCarthy, Darryl  
McDermott, Lauren  
McDermott, Rebecca  
McGrath, Christopher  
McHugh, Eden  
McHugh, Greg  
McKenzie, Daniel  
McLean, Sasha  
McMahon, Jane  
McVinish, Hannah  
Melink, Sally  
Melksham, Bill  
Menon, Jaideep  
Messineo, Daniella  
Meurant, James  
Miller, Graham  
Min, Amy  
Min, Sehee  
Minh Van, Michelle  
Minshik, David  
Mitchell, Alexandra  
Miyasaki, Vincent  
Moghaddma, Anthony  
Mogilevski, Alexi  
Moharrami, Babak  
Moller, Steen  
Moller, Steve  
Moon, Richard  
Moon, Sarah  
Moore, Jonathan  
Morris, Laura  
Mot, Anastasia  
Mot, Elizabeth  
Mouna, Tasnia  
Mount, Jeff  
Mousa, Seth  
Muk, Lok Chern  
Muller, Bruno  
Muller, Marcel  
Murad, M  
Murray, Daniel  
Murray, Sarah  
Nagalingam, Vijay  
Naidoo, Keolin  
Naidu, Devan  
Nairn, Natalia  
Nahal, Gary  
Nan, Sheree  
Nandha, Mihar Rakesh  
Narahnowicz, Livia  
Nayagam, Pramodh  
Neoh, Beng-Lynn  
Newett, Molly  
Ng, Angie  
Ngieng, Paul

Ngo, Mini  
 Ngoo, Derek  
 Ngugen, Hanh Hong  
 Nguyen, Allan  
 Nguyen, Bao Tran  
 Nguyen, Huy  
 Nguyen, Jenny  
 Nguyen, Kim  
 Nguyen, Martin  
 Nguyen, Peter  
 Nguyen, Stephanie  
 Nguyen, Viet  
 Nguyen, Vincent  
 Nguyen, Vivienne  
 Nguyen, Wendy  
 Nicholson, Larissa  
 Nikgoo, Arash  
 Nilsson, Angie  
 Norlin, Bob  
 Nosratieh, Nazila  
 O'Shannessy, Kieran  
 Oh, Dayea  
 Oh, Stella  
 Oh, Victor  
 Oluwole, Tobi  
 Ong, Natania  
 Ong, Sabina  
 Ooi, Ai Fen  
 Ooi, Kai  
 Packer, John  
 Packianathan, Manjara - Not for publication  
 Paddison, Andrew  
 Pandey, Ram  
 Parameswaran, Abirami  
 Parimalanathan, Vaishnavi  
 Park, Nastasha  
 Park, Seunghyun  
 Parker, Sam  
 Parkins, Brent  
 Patel, Dilan  
 Pawar, Susma  
 Pearce, Jenna  
 Peranathan, Krish  
 Perchyonok, Tamara  
 Perera, Duane  
 Perham, Stephen  
 Pham, Jenny  
 Pham, Nguyen  
 Pham, Pauline  
 Pham, Anthony  
 Pham, Christine  
 Phang, Jo Ann  
 Philip, Damien  
 Phoon, Amanda  
 Phoon, Karmun  
 Phung, Nathan  
 Pilkington, Bernadette  
 Pino, Rachel  
 Pinto, Marianne  
 Pitty, Luke  
 Ponna, Priyanka  
 Pope, Oliver  
 Porter, Steven  
 Preeyadarshanan, Haren  
 Prokopiou, Stavroula  
 Pun, Ellen  
 Purcell, Gemma  
 Pye, Phuong  
 Qu, Kainan  
 Quach, Nhi-Tran  
 Quinn, Angus  
 Quo, Marcus  
 Rahimi, Mehdi  
 Rajasingham, Dilham  
 Rakshya, Sharma  
 Rameswaran, Janani  
 Ramzy, Mathew  
 Randall, Jade  
 Randall, James  
 Randall, Jasyn  
 Raniga, Prashant  
 Rattan, Shivani  
 Raval, Jignesh  
 Rayana  
 Read, Peter Kellner  
 Reeves, Kim  
 Reguerio, Pablo  
 Renison, Tim  
 Rizwan, Sadaf  
 Rogan, Emma  
 Rojukhirdu, Sandhya  
 Ronosulistyos, Natasha  
 Rose, Miree Hannah  
 Rumbal, Chloe  
 Rus, Anna  
 Russell, Peter  
 Rutley, Ward  
 Ryan, Alex  
 Ryan, Jo-Anne  
 Ryan, Tegan  
 Ryan, Tom  
 Sadick, Norman  
 Safi, Ali Kadhem  
 Saha, Anik  
 Saleemi, Muhummad Azher  
 Sam, Elina  
 Samir, Ahmad  
 Sang, Michael  
 Saouma, Joseph  
 Savran, Ihsan  
 Schaltz, Kyle  
 Schottlander, Ben  
 Scott, Andrew  
 Seeto, Nigel  
 Segawa, Jill  
 Selim, Daniel  
 Seng, Audrey  
 Shah, Naresh  
 Shan, Alice  
 Shanmugananthakumar, Janahan  
 Sharma, Arunditi  
 Sharp, Rebecca  
 Shelton, Cassidy  
 Shield, Stephen

Shiino, Kei  
Shin, Eun Hye Hailey  
Shin, Hector (O Chul)  
Shin, Jae Woo  
Shiu, Ki  
Siddiqui Maliha  
Signh, Navdeep  
Sim, Rachel  
Sin, Kevin  
Sivanantha, Thushyanthan  
Skibeck, Michael Gerard  
Smiles Limited Queensland x 6  
Smith, Ashley  
Smith, Gary  
So, Beng Kai  
So, Elaine  
So, Emily  
So, Keziah  
Soares, Maria  
Soh, Samuel  
Soh, Wanjun  
Soltanimoghaddam, Sina  
Solter, Rhiannon  
Soltys, Alysha  
Somers, Miles  
Somers, Rhea  
Song, Akiko  
Song, Anna  
Song, Jun-woo Jacob  
Song, Sieun  
Soon, Alistair - Not for Publication  
Soon, Justin  
Sproll, Andrew  
Sriram, Balya  
Starcevic, Branka  
Steele, Brett  
Stephen, Dudgeon  
Stewart, Timothy  
Stojcev, Aleksandar  
Stout, Louise  
Stuhmcke, David  
Su, Nilan  
Sugnanam, Ajitha  
Sukhundan, Sudhesh  
Sumathipala, Ranisha  
Sun, Xiao-Hang  
SungKwon, Joon  
Sunjay  
Suntharendran, Rhadika  
Surapaneni, Theja Sun  
Suryanarayana, Shreyas  
Svenson, Lloyd  
Taing, Julie  
Tajaard, Lauren  
Talluri, Saranya  
Talovic, Sarah  
Tam, Alex  
Tan, Ai Lin  
Tan, Christina  
Tan, Emma  
Tan, Kent  
Tan, Kevin

Tan, Mie Ting  
Tang, Alistair  
Tanner, Alanna  
Taylor, S  
Tedjasukmana, Andre  
Teoh, Wei Tzen  
Teoh, Yu-Yao  
Tep, Karrona  
Terranova, Daniel  
Thai, Duy  
Thalagala, Dinusha  
Thich, Jason  
Thode, David  
Thomas, Greg  
Thompson, Andrew  
Thompson, Charles  
Thumpkin, Kym  
Timms, Alexander  
Toll, Christian  
Tong, Lisa  
Traeger, Jacinta  
Tran, Alan  
Tran, Katie  
Tran, Lan  
Tran, Mai  
Tran, Steven  
Tran, Thomas  
Tran, Vincent  
Tran, Ying  
Trandinh, Minhtran  
Trinh, David  
Truong, Hien  
Truong, Lawrence  
Tsang, Janet  
Tsao, Julianna  
TT  
Tu, Victoria  
Tuffley, David  
Turnock, Christopher  
Tyler, Aileen Rose Buckley  
Usher, Doona  
Uskokovic, Anya  
Valentine, Stephen  
Vanderburg, Martain  
Vasant, Mitesh  
Verma, Ramnish  
Vidimice, Stefan  
Vijayakuma, Daneshkumar  
Vlassopoulos, Evan  
Vismas, Michael  
Vo, Ngoc Thuy  
Vu, An  
Vyas, Neeraj  
Wahab, Adam  
Wai, Tibby  
Waller, Daniel  
Waller, Jessica  
Walsh, Christopher  
Wang, Chen  
Wang, Davy  
Wang, Jennifer  
Wang, Jenny

Wang, Katie  
Wang, Mengzhu  
Warren, Tamara  
Watson, C A  
Wauchope, Tom  
Weerasinghe, Ireash  
Wei, David  
Welsh, Jordan  
White, Cameron  
Wickramasuriya, Rukshi  
Widiyati, Jessica  
Wilkinson, Emma  
Williams, Francis  
Willis, Keith  
Wilson, Andrew  
Withers, Thomas  
Wong, Aaron  
Wong, Andrew  
Wong, Ashleigh  
Wong, Ling  
Wong, Matthew  
Wong, Natalie  
Wong, Pui Lam Erica  
Wong, Terence  
Wood, Melanie  
Woodhouse, Peter  
Wu, Jennifer  
Wu, Lee Ye  
Wu, Nancy  
Wu, Wei-Heng  
Wylie, Mark  
Xiong, Zac  
Xuan, Minh-Thu Cao  
Yam, Cherie  
Yam, Tat  
Yang, Benjamin  
Yang, Dongni  
Yang, Hyung Min  
Yang, Jimmy  
Yang, Kyu Mo  
Yang, Po  
Yang, Rebecca  
Yang, Reina  
Yang, Seung Han  
Yang, Sook  
Yap, Evelyn  
Yap, Michelle  
Yap, Yiling  
Yashin, Dilara  
Yau, Marvin  
Yeung, Phylis  
Yew, Christine  
Yim, Chi-Sang  
Ying, Sherry  
Yong, Andrea  
Yong, Ching  
Yong, David  
Yong, Tom  
Yoon, Catherine  
Yoon, Matt  
Yoon, Sul  
Yoon, Sun Young

Yu, Lucy  
Yu, Sheryl  
Yu, Yao  
Yu-Hsuan  
Yunn, Tan Chee  
Yusuf, Mohammed  
Zang, Alyssa  
Zhang, Frank  
Zhang, Jack  
Zhang, Jayee  
Zhang, Kathy  
Zhao, Sean  
Zhou, Richard  
Zhu, Fengning  
Zhu, Yuen  
Zuo, Joanne



Executive Officer  
National Board of Australia  
AHPRA  
GPO Box 9958  
Melbourne 3001

Dear Sir/Madam

**Dental Board of Australia - Draft *Scope of practice registration standard and guidelines***

I am concerned that some of "the range of skills covered in the programs (sic) to extend scope" do not seem very well thought through and they are worded in a confusing manner.

Prosthetists appear to be given an expanded scope of practice, by stating on p19 of your document that their range of skills will include: immediate dentures, immediate additions, occlusal splints, sleep apnoea and snoring appliances. However, it states on p17 that they may only do this with a written referral by a dentist/dental specialist, and even then the dentist/dental specialist must plan, issue and manage the device. This confines the prosthetist to the role of technician whilst seemingly giving them an increased scope of practice. The proposed change is confusing and will no doubt lead to prosthetists misinterpreting the document and practising unlawfully.

The only true increase in scope of practice for prosthetists applies to the diagnosis, planning, fabrication and management of implant-retained over-dentures. This is not in the public interest and will undermine public safety.

It is argued that an implant-retained over-denture (which is considered a very good treatment modality) should not be part of a dental prosthetist's scope of practice. Whilst the success rate of this treatment is very high with dentists and dental specialists with the appropriate knowledge base, there are many areas outside the knowledge base of dental technicians that need to be well comprehended for this treatment to be successful. There is increased risk of treatment failure if treatments are undertaken without this knowledge base.

Prosthetists cannot make a full and accurate diagnosis because they do not have a full skill set regarding management, complications and alternatives. The proposed change of the scope would require diagnostic and management ability which has not been part of their training

It is also rejected that Cone Beam Computed Tomography (CBCT) would need to be ordered by a dental hygienist, dental therapist, oral health therapist or a dental prosthetist given their limited training and scope of practice. The Dental Board of Australia could be seen to be abrogating its responsibility for patient safety in allowing procedures to be undertaken without ensuring an adequate knowledge base.

Yours faithfully

Dated June 2013

Executive Officer  
National Board of Australia  
AHPRA  
GPO Box 9958  
Melbourne 3001

Dear Sir/Madam

**Dental Board of Australia - Draft *Scope of practice registration standard and guidelines***

The AHPRA Service Charter states that: "We act in the interest of public health and safety". The proposed changes to the scope of practice are not in the interest of public health and safety.

"Dental disease is widespread and expensive to treat and impacts negatively on the quality of life and overall health of Australians." "Oral Health therapists are needed, but not to mimic the role of the dentist". (Ford and Farah, 2012)

**Public safety**

Expanding the scope of practice for Oral Health therapists (OHT), Dental therapists (DT) in the false hope of providing cheaper or more accessible dental care to Australians is a public safety hazard. These practitioner categories exist largely to provide an educative role in decreasing the preventable oral health burden. Expanding the range of treatments that they can perform or raising age limitations denies the complexity of modern adult dentistry. Allowing independent decision making and autonomous practice provisions will result in flawed treatment planning. For practitioners to perform irreversible procedures on people of all ages, a degree as a dentist must be the minimum qualification. Any other outcome will create significant irreversible harm to the dental public.

DT and OHT cannot simply extend their basic paediatric skill set to the treatment of adult patients. Even though they can perform the technical skill of restoring teeth on children, treatment of adult patients relies more on complex diagnostic skills.

**Public health**

"What is critically needed is for the Health System (Dental Board of Australia) to recognise the importance of prevention of oral disease and allow OHTs to practise to their full current scope of practice" (Ford and Farah 2012).

Removing and/or redistributing the OHT/DT workforce away from an area of need (children) and oral health prevention would compromise equitable distribution of services to the population and effectively amount to a neglect of duty by the Dental Board of Australia. Such action will significantly impact on vulnerable populations for decades to come. This directly contravenes Australia's National Oral Health Plan 2004-2013.

There is a predicted increase in the number of dentists by approximately 25% in the next three years. The Dental Board of Australia must question whether its plan to relax the current scope of practice standard for DT/OHT is necessary when the available number of dentists is increasing so rapidly.

I am of the opinion that the suggested changes to the existing Scope of Practice will jeopardise the current high standard of dental care that Australians enjoy. I would ask that the Dental Board of Australia reject these changes.

Yours faithfully

Dated June 2013

Executive Officer  
National Board of Australia  
AHPRA  
GPO Box 9958  
Melbourne 3001

Dear Sir/Madam

The National Board has proposed key changes to the Scope of practice registration standard. I write to express my concern with a number of proposed changes.

**The first is to “support the team approach to dental care”.**

It should not be necessary to consider this to be a key change. During the years of study to be awarded a degree in dentistry, the team approach was, and is a significant component of that education, and following graduation is a vital factor in the routine performance of dentistry.

**The second key change is a proposal to “remove supervision requirements in recognition of the team approach”.**

This proposal is seriously flawed as it undermines public safety. As the most qualified member of the dental team, it is the dentist who must retain the responsibility of the supervision of patient management. To allow less qualified persons to make potentially irreversible treatment decisions is irresponsible. As the leader of the dental team, it is the role of the registered dentist to supervise patient management and delegate tasks to appropriately qualified personnel.

**The third key change proposed is to “reduce the prescriptive nature of the standard”.**

As in the second proposal, any reduction in the supervision of the members of the dental team has the potential to also undermine public safety. For this reason, the existing prescriptive nature must be retained.

**The fourth proposal is to “provide further clarification on the standard”.**

The National Board proposes that “The guidelines are intended to provide greater certainty and clarity to dental practitioners and the public...”

The definition of dentistry for a dentist is overly restrictive. A dentist's degree provides a core skill set which allows further evaluation and integration of additional skills. There is no need for an all-inclusive definition of what constitutes dentistry to exist, to then be applied to a dentist. However, dental therapists, dental hygienists, oral health therapists and dental prosthetists, all of whom offer a restricted scope of practice, need to have all the elements of their scope of practice defined.

Dental therapist, dental hygienist, oral health therapist and dental prosthetist degrees do not provide the necessary foundation to allow the addition of a wide ranging skill set. Complete and accurate diagnosis of adult patients requires a variety of skill sets, which is achieved based on 5-7 years of education through a dental degree. Without this foundation the complete skill set necessary for accurate diagnosis is not possible.

The current and proposed guidelines essentially dictate that all ‘dental practitioners’ should be self-regulating in the ‘dentistry’ they practise. However, only those with the highest level of training should have the capacity to self regulate. Those with limited skill sets need to have their skills well defined and matched to the community need, and must ensure public safety is maintained. The only formal education and training which would allow an extension of the scope of practice for dental therapists, dental hygienists, oral health therapists and dental prosthetists would be that which is equivalent to a undertaking a dental degree.

In summary, the Dental Board of Australia should reject the proposed changes.

Yours faithfully

Dated June 2013