

From: [REDACTED]
To: [dentalboardconsultation](#)
Subject: Submission re: scope of practice registration standard and guidelines
Date: Tuesday, 18 June 2013 11:39:16 PM

Dear Sir/Madam

I am a general dentist and I am extremely concerned about what is proposed in the draft scope of practice registration standard and guidelines. I am especially concerned about the proposed expansion in the scope of practice of dental therapists.

First of all, dental therapists do not undergo the same amount of theoretical and practical training as dentists do. They do not have the same understanding of dentistry to be able to adequately diagnose dental disease and without a correct diagnosis, the wrong treatment will likely be given. They are also not sufficiently trained to manage the patient's general health implications, drug interactions and possible medical emergencies. As a health practitioner, we need to be sufficiently trained to be SAFE for treating patients - first do no harm. Increasing the OHT scope of practice will obviously be in violation of this.

The draft scope of practice registration standard and guidelines suggests that it is a simple expansion of the OHT's paediatric skill set to the treatment of adult patients. This sounds like a logical of a skill set but any dentist is well aware that it is not, as the deciduous dentition is different to the permanent dentition in anatomy, progression of disease, response to disease and hence the treatment principles are completely different. As a result, a deciduous and permanent tooth with the same diagnosis may need different treatment, and even if they needed the same treatment, it may be carried out with a different technique. Diagnostic, treatment planning, and treatment techniques DIFFER between deciduous and adult teeth so just because they treat deciduous teeth does not make them competent enough to treat adult teeth.

Furthermore, it would not help to address the work force shortage. There are an excess number of dentists in the cities and a shortfall in rural and regional areas. The problem is one of distribution and not numbers so increasing the numbers will not fix it. In fact there is already an excess number of dentist graduates available.

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

Dr Joyce Hsu