

Dental board submission

Dental Board Of Australia. [dentalboardconsultation@ahpra.gov.au](mailto:dentalboardconsultation@ahpra.gov.au)

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

I wish to outline my view that the proposal "to remove the requirement of a structured professional relationship" should not be made.

Re:"50. The Board proposes to remove the requirement of a structured professional relationship from the registration standard. In the proposed revised registration standard, the Board has strengthened its expectations for working through a team approach for dental practitioners, and also included reference to the Code of conduct."

For following reasons.

1. Fragmentation of Oral Health Care.

This proposal will create separate silos and fail to facilitate true integrated health outcomes.

Health care is increasingly looking at required inroads to integration, I refer to Kurt C.Strange in "The Problem of Fragmentation and the Need for Integrative Solutions" [Ann Fam Med](#). 2009 Mar; 7(2): 100-103.

2. Diagnosis by a Dentist.

Diagnosis is central to deeper health care. The broadest possible view a dentist provides is essential to efficient health and disease care. Diagnosis is best made by a treating dentist. Although there may be an appearance of doing same things, therapists and hygienists do not have same training and skills and do not do the same as a dentist.

Diagnosis is more important than treatments for its own sake. The role of diagnostician is central. With these proposed changes I see the outcome may end up increasing risk to public. As procedures are encouraged and mistakenly advanced without therapy- that is without health related outcomes. This displaces dental care for cosmetics or a narrow consumption of dental services. I believe oral health is greater than that, more complicated than that and more difficult to achieve.

Work force matters currently allow use of under- utilized dentists more than anticipated in previous reviews.

3. Contradictory Message to community.

This proposal action to break a structured relationship between providers states to the public that the involvement of the dentist is not a valuable aspect of care. In deed. An action that will be interpreted as such no matter what the board desires the public to think. This is a statement of the board's values and is Contradictory. To remove the connections between relevant practitioners then to say the board "has strengthened its expectations for working through a team approach for dental practitioners" is contradictory.

The Board should not delegate away their responsibility to the community. We expect the board to promote a working framework to enhance delivery of health care. This proposal breaks the structure and framework that ensures oversight to encourage a professional relationship.

Dental board submission

Thanks you for the opportunity to voice my concern for the provision of dental care.

Sincerely Adam Frederick.

████████████████████

14 May 2018