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*Advancing anaesthesia,
improving patient care*

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Dr John Lockwood AM
Chair
Dental Board of Australia
GPO Box 9958
Melbourne VIC 3001

Email: dentalboardconsultation@ahpra.gov.au

Dear Dr Lockwood,

Public consultation on proposed entry level competencies for endorsement for conscious sedation

Thank you for the opportunity to provide comment on the public consultation document, *Consultation on proposed entry level competencies for endorsement for conscious sedation*.

The Australian and New Zealand College of Anaesthetists (ANZCA), including the Faculty of Pain Medicine (FPM), is committed to high standards of clinical practice in the fields of anaesthesia, perioperative medicine and pain medicine. As the education and training body responsible for the postgraduate training programs of anaesthesia and pain medicine for Australia, New Zealand and parts of Asia, we believe in ongoing continuous improvement and strive to ensure our programs represent best practice and contribute to a high quality health system.

The medical specialty of anaesthesia is critical to the provision of safe, effective anaesthesia and perioperative care for patients. ANZCA is involved in anaesthesia mortality reviews, collecting patient outcome data, publishing information relevant to the safe practice of anaesthesia, preparing evidence based guidelines and improving communication about quality and safety in anaesthesia, perioperative medicine and pain medicine. Its Faculty of Pain Medicine is the first multidisciplinary medical academy in the world to be devoted to education, training and standards in pain medicine.

ANZCA and FPM have reviewed the proposed entry level competencies, and responses to the consultation and the included questions are set out below.

General comments

ANZCA supports the Dental Board in setting entry level competencies expected of dental practitioners who wish to be endorsed to administer conscious sedation. It is important that patients who require anxiolysis and/or amnesia whilst undergoing a dental procedure, and thus are in need of sedation, are under the care of an appropriately skilled practitioner. Patient safety is paramount. Implementation of practice competencies assists in setting practice standards.

As noted in ANZCA's previous submission (Preliminary Consultation, April 2016), the sedation spectrum is a continuum from anxiolysis to general anaesthesia and patients may transition from one state to another unpredictably. The term "conscious sedation" is used by the Dental Board in defining the proposed competency. This term implies that a patient is responsive to minimal stimulation but the ever-present possibility of inadvertent transition to deeper sedation requires that a practitioner has the appropriate airway and cardiovascular support skills to manage unintended complications. If verbal contact is lost, the patient requires a level of care which in some respects approaches that needed for provision of general anaesthesia. Hence, the Dental Board's proposed entry level competencies need to provide clear and unambiguous instruction to practitioners on the constraints around their intended scope of practice.

Comments on the proposed competencies

Separation of entry level competencies for graduate dentists from those required for conscious sedation would clarify the requirements for the latter.

ANZCA notes that in their current form, the entry level competencies form a high level framework for the development of educational curricula. Further detail is required to define the practice of safe dental conscious sedation. This would include:

- pre-procedure assessment including the use of risk assessment tools to ensure appropriate patient selection
- the process of sedation including drug selection and delivery
- monitoring of the patient during and after the procedure
- adequate documentation of medication delivery, vital signs and monitoring used
- plans for discharging patients following sedation
- the requirement for additional skills needed to deal with any complications.

With regard to these points, ANZCA has already developed guidelines that may assist the Dental Board of Australia in the scoping and further refinement of the listed competencies. ANZCA would welcome the opportunity to assist, and invites the Board to access the relevant material.

In addition to ensuring safe conscious sedation skills, any endorsement should ensure that a practitioner has an understanding of a safe operating environment in terms of appropriately skilled staff, equipment and infrastructure. Dental practitioners should be cognisant of whether the facilities in which they practise comply with the appropriate licensing regulations. The principles of maintaining records and auditing personal practice should also be included in competency assessment.

ANZCA is of the opinion that all approved dental sedation competency based courses must deliver the requirements outlined in these entry level competencies. Thus, the accreditation body will need to ascertain whether the currently approved competency based courses, as well as any future courses, deliver these requisite skills.

ANZCA makes the following specific suggestions for the Dental Board's consideration:

Definitions

For the sake of completeness, all definitions of the states of altered consciousness in the ANZCA Professional Document, *PS09 Guidelines on Sedation and/or Analgesia for Diagnostic and Interventional Medical, Dental or Surgical Procedures* should be included so that these are clear to the practitioners seeking endorsement. Specific reference should also be made to section 2 of PS09 ("Aims and Risks of Procedural Sedation and/or Analgesia").

Concerning the Domains of professional activity

Professionalism:

- 1a. To "knowing when to refer or seek advice appropriately" add "based on individualised patient risk assessment for sedation, and incorporating local referral arrangements".
- 1j. To "using a system approach to safety and quality" add "and incorporating local audit data to improve safe sedation practice, e.g. appropriateness of patient selection, detection and management of the deteriorating patient".

Communication skills

- 2a. Ensure the patient understands the intended depth of sedation, and the implications (and the options).
- 2b. / 2c. Add "incorporate the elements of shared decision-making when developing a sedation plan with patients/families/relatives/carers".
- 2d. Specify "communicate an individualised sedation plan to the patient, to team members and other health professionals, including the intended depth of sedation".

Critical thinking

Add "an ability to review adverse sedation-related outcomes based on local data and identify trends and implement solutions for local improvement".

Scientific and clinical knowledge

Specification of the clinical knowledge and skills required would be expected to be detailed within the curriculum but emphasis should be placed on:

- 4c. Pre-operative assessment "to identify patients at increased risk of cardiovascular, respiratory or airway compromise".
- 4d. An understanding of "the sedation/anaesthesia continuum, and the effects (both intended and adverse) and margins of safety of drugs used".

Add specific competencies relating to:

- Identification and management of patients who have lost protective airway reflexes and/or airway patency
 - partial or complete airway obstruction
 - apnoea
 - unintended loss of consciousness
 - adverse drug reactions including anaphylaxis
 - cardiovascular depression
- The ability to provide effective bag-mask ventilation is crucial.

Ongoing demonstration of practitioner competence

ANZCA regards this consultation to be highly important in ensuring that dental practitioners endorsed to provide dental sedation are suitably qualified to do so. Consideration should be given to processes of monitoring and auditing a dental practitioners':

- performance
- maintenance of conscious sedation skills and knowledge
- conscious sedation endorsement currency
- completion of the appropriate standard of CPD in dental sedation
- ability to demonstrate the capacity to adequately assess patients for risk and suitability and/or manage complications.
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Options Statement

ANZCA supports Option 2: the development of entry level competencies for conscious sedation, with consideration given to ANZCA's responses as set out above.

ANZCA would be pleased to engage with the Dental Board on the further development of competencies that align with safe conscious sedation standards.

ANZCA's responses to the specific questions on the proposed entry level competencies

1. Is the purpose of the proposed competencies understood?
Yes
2. Is the content and structure of the proposed competencies clear?
Yes
3. Does any of the content need to be changed or removed? If so, provide details
See ANZCA's feedback above
4. Do you think that the competencies should only include those specific to the practice of conscious sedation (i.e. those in addition to the ones expected of general dentists)?
No - see ANZCA's responses above
 - To avoid duplication and to simplify presentation, separate documents could be prepared for the entry level competencies for graduate dentists and for the competencies required for endorsement of dental practitioners to administer conscious sedation.
 - Refer to page 14 of "*Minimum Standards for Safe Procedural Sedation*", produced by the NSW Agency for Clinical Innovation (ACI) https://www.aci.health.nsw.gov.au/data/assets/pdf_file/0006/218580/Minimum_Standards_for_Safe_Procedural_Sedation_Project_-_Final_-_updated_June_2015.PDF
5. Do you have any other comments on the proposed competencies?
See ANZCA's feedback above
6. How often do you think the competencies should be reviewed? e.g. every three years, every five years
Every 3 years. ANZCA also recommends that guidelines for the implementation of Advanced Life Support training should be developed, and that these guidelines include consideration of a more frequent (annual) review of the competencies.

Thank you for the opportunity to provide feedback. Should you require any further information, please contact [REDACTED] General Manager Policy via email [REDACTED] or telephone [REDACTED]
[REDACTED]

Yours sincerely



Professor David A Scott
President