

From: [REDACTED]
To: [dentalboardconsultation](#)
Subject: scope of practice consultation
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I am writing in response to the draft scope of practice registration and guideline.

There are two areas that raise my concern:

1. The draft proposed to allow dental hygienist and therapist to provide treatment for adult patient after accreditation. Treatment planning on adult involve more comprehensive treatment planning that should consider the conditions of the whole mouth and all the patients factors. Whilst their training may equip them to provide simple restorations, with the patients receive all of the treatment and examinations through a dental auxiliary without dentist supervision, they may miss out on a more comprehensive treatment plan that may involve complex treatments.

There are already an oversupply of dentists. Adding hygienist and therapist to provide general dental treatments will just worsen the workforce supply imbalance.

2. There are clear areas on the treatment scope. It states, "Dental practitioners must only perform dental treatment:

- a) for which they have been formally educated and trained in programs of study approved by the Board, and
- b) in which they are competent provide treatment.

That puts dentist in the unclear zone. Treatments like wisdom teeth extraction, orthodontics, implants etc. are usually not part of the undergraduate training and usually dentist gain that clinical competency through guidance by senior dentists where they work or continuous professional development programs. It is often to the benefit of the patients that a dentists continuously seek to learn and expand the scope of practice to provide more comprehensive treatment planning and treatments. At this stage the list of formal education approved by the board is not clear. Would that means that general dentists are not able to provide orthodontic treatment and implants, for example, because these are not part of formal dental degree program?? If that is the case, what would be the happening to the patients and dentists where the dental GP are already providing such treatments.

I think there should be more clarification and consultation within the industry before the new scope of practice registration standards comes into effect.

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