

It is a characteristics of healthy political and social development when professions and workforces grow and morph progressively over time.

With this in mind, it makes perfect, logical sense, that policy and guidelines should do likewise.

As such, I would like to submit my personal thanks to the Dental Board of Australia for submitting the well considered proposals on:

- a proposed revised *Scope of practice registration standard*
- a proposed revised *Guidelines for scope of practice*, and
- a new *Reflective practice tool for scope of practice*.

Whilst change can provide challenges to us all, there can be no progression without it.

As an Oral Health professional, **I support the Board's recommendation for OPTION 2:**

Option two is to consult on a number of proposed changes to the current registration standard and guidelines. Under this option, the proposed revised registration standard and guidelines would continue to set out the Board's requirements for scope of practice however it would:

- *remove reference to Programs to extend scope from the registration standard and guidelines giving effect to the Board's decision to phase out the approval process of these programs with a transition period until 31 December 2018*
- *clarify expectations around education, training and competence including revisions to the practitioner dental divisions and strengthening the link between an approved program of study and the relevant professional competencies*
- *reduce unnecessary regulation in light of well-established accreditation functions which have shaped practitioner training and competencies*
- *remove the requirements for dental hygienists, dental therapists and oral health therapists not to practise as independent practitioners*
- *further clarify the Board's expectations around the team-based approach and remove the requirement for a structured professional relationship, and*
- *improve readability and clarify current requirements by restructuring and re-wording the standard and guidelines.*

Further, as a recognised profession, I submit the support for Oral Health Therapists (OHT's) to work under their own provider number.

The programs of study for OHT's has been managed by accreditation standards required by AHPRA to meet the National Law. As such, a graduate of such courses should be acknowledged in their practise as being competent when delivering services within their scop of practise. **As with other health professionals registered with AHPRA**, this standard of education and training, (along with

CPD update requirements for registration and personal indemnity insurance), meet all requirements to practice under an individual provider number.

Many thanks

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