

6 November 2015

Jennifer Chapman
Project Manager
State Scope of Clinical Practice Unit
North Ryde 2113 NSW

By email: Jennifer.chapman@health.nsw.gov.au

Dear Ms Chapman

Re: State Scope of Clinical Practice Unit - Discussion Paper

I refer to Dr Roger Boyd's letter dated 8 October 2015 that provided the Model Scope of Clinical Practice Project Report and Recommendations. ADA NSW welcomes the opportunity to comment on the proposed template to be used for defining SoCP in NSW Health.

ADA NSW has considered the Report and the proposed template and we provide the attached comments. In preparing these comments, ADA NSW has drawn on the expertise of the members of our Advocacy and Policy Committee, in addition to members of our NSW Council. We forwarded the Report to a number of the dental specialist associations/societies but did not receive any comments.

Please add ADA NSW to the email list for project updates, including the establishment of working groups and the availability of draft SoCP documents for comment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Burgess', written in a cursive style.

Ian Burgess
Chief Executive Officer

DOCUMENT TITLE:	State Scope of Clinical Practice Unit– Report and Scope of Clinical Practice Template
COMMENTS PROVIDED BY:	ADA NSW
General Comments:	<p>ADA NSW reaffirms its support for a State-wide consistent and uniform approach to credentialing and defining scope of clinical practice for dental practitioners working in NSW public facilities.</p> <p>ADA NSW broadly supports all recommendations contained in the Report. The generic draft Scope of Clinical Practice Template is supported with suggested minor revisions to make it relevant for reviewing SoCP for dental practitioners.</p> <p>ADA NSW has a strong interest in credentialing and defining scope of clinical practice for dental practitioners and believes its members will make a valuable contribution to the successful outcome of this project.</p> <p>ADA NSW would like to request:</p> <ul style="list-style-type: none"> • a nominated representative of ADA NSW to be a member of the working group defining scope of clinical practice for dental practitioners • a nominated senior practicing dentist from ADA NSW to be a member on the dentist-credentialing process to ensure cross-sector clinical standards • inclusion in your Unit’s mailing list to continue receiving project updates, documents for comments and be involved in working groups when established <p>ADA NSW suggests that relevant specialties recognised by the Dental Board of Australia be consulted on this Project.</p>

Specific Comments/Questions regarding the Report and Recommendations:

Section/ Page Number	ADA NSW Comments
Section 1.2. Role of the State Scope of Clinical Practice Unit– Page 3	Model SoCPs for dentists and dental specialties be created and piloted with input from the relevant organisations.
Section 2. Themes and Recommendations – Page 5.	More clearly defined scope of clinical practice is required for dental practitioners working under General Anaesthesia and when Tele Dentistry is practiced.
Section 2.5. ‘Exclusions’ from Practice. – Page 10	For dentistry, the ‘special needs category patients’, especially the medically compromised, frail and dependent older patients should be identified as a priority group requiring public protection. Generic clinical reasoning applied to these patients can lead to major adverse consequences.
Section 3.6. Credentialing Dentists. Page 18.	This consultative finding is supported. NSW Health has a duty of care to provide services using suitably qualified and competent health care providers. Credentialing and SoCP should be carried out for all dental practitioners providing clinical services within NSW Health facilities as a necessary assurance for safe practice. This should include all dental officers, irrespective of their levels, Visiting Dental Officers, Dental Specialists and dentists undertaking volunteer work.
Appendix 2 – Draft SoCP Template	<p>The generic Draft Scope of Clinical Practice Template is supported with the following suggestions provided for the Template to be more relevant for dental practitioners. ADA NSW recommends that the relevant specialties recognised by the Dental Board of Australia be consulted.</p> <p>Core Scope of Clinical Practice for the Speciality of {insert speciality and sub –speciality field as per AHPRA designations} Attributes and competencies statements of the newly qualified dentist have been developed by the Australian Dental Council and are currently under review. This statement can be sourced from the Australian Dental Council website.</p> <p>Qualifications Required for Core Scope of Clinical Practice. The Dental Board of Australia’s website provides authoritative information on approved programs for registration purposes as a dentist or dental specialist as well as available registration pathways for internationally qualified dentists.</p>

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	<p>In the public sector there are some specialists who are hospital recognised but not Board recognised.</p> <p>Would evidence of current Continuing Professional Development Registration Standard be included under this?</p> <p>Scope of Clinical Practice Requiring Specific Credentialing Endorsement for conscious sedation for a dentist and dental treatment provided under general anaesthesia for general practitioners.</p> <p>Extended Scope of Clinical Practice Suggest amending the term from 'Extended' to 'Additional' Scope of Clinical Practice to avoid confusion amongst practitioners and reviewers especially if the template will be extended to include all registered health practitioners.</p> <p>Emergency Practice A practitioner's SoCP should be within the scope of practice and therefore it is unlikely that the practitioner would face a double jeopardy, NSW Health and Health Care Complaints Commission, in the described emergency circumstances. Suggest amend 'Emergency Practice' to 'Responding to Clinical Deterioration' to align with the intentions of and harmonise with the NSQHS Standard 9: Recognising and Responding to Clinical Deterioration in Acute Health Care.</p> <p>Practice Conditions, Undertakings, Reprimands, Endorsements and Notations as per the Medical Board of Australia Minor revision by substituting Dental Board of Australia for Medical Board of Australia</p> <p>Sign Off Suggest amendment of the title from 'Sign-Off' to 'Outcomes of Credentialing and Scope of Clinical Practice' and revision of this section to summarise the decisions of the review.</p>