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Parnell House
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Re: Competition in Professional Services – Preliminary Report on Dentists.

I acknowledge with thanks receipt of your preliminary report on *Competition in Professional Services – Dentists* and welcome the opportunity to comment on same.

The Dublin Dental School and Hospital provides education and training for all members of the dental team, which currently includes dentists (both general practitioners and specialists/consultants), dental hygienists, dental nurses and dental technologists. Our concern is to provide appropriately trained personnel to meet the oral health care needs of the community we serve. We also provide patient care at primary, secondary and tertiary levels as well as undertaking important research in a variety of dental fields.

The Dublin Dental School and Hospital's view of the dental team is that it not be hierarchical, but all practitioners work together to the benefit of patients. This implies that all members of the team fully recognise the scope of their clinical practice and know when to refer patients for appropriate care. It is well established that oral health outcomes are best for patients who have access to comprehensive, integrated dental care. For example, patients with dentures who have their teeth cleaned regularly have better oral health than those who have dentures with no cleaning. Good dental care does not preclude direct access by patients to dental hygienists or clinical dental technicians. However, any future changes must ensure that patients continue to have access to a full range of oral health information and services, and not just isolated items of treatment.

The provision of quality oral health care is based on the selection of treatment appropriate to the individual needs of the patient; often these treatments are complex and interdependent, with the success of some treatment based on the response to another. Ongoing neglect of dental disease, or the limitation of treatment options, may lead to irreversible damage of dental tissues. Hence, while items of treatment may be performed competently by a range of team members, it is important that patients receive comprehensive advice on their overall oral health needs.

We have some concern that in a direct access model for oral health care, patients may not be fully informed of their treatment options. For example, a patient with missing teeth should be aware of different options that may be available to them (including dentures, bridges or implants) and the relative advantages of each. It is not clear how patients will be able to make an informed decision on the best treatment for themselves, if they attend a clinical dental technician who is trained only in the provision of dentures. Likewise, the current best practice for the treatment of patients without any teeth includes an assessment for implants, which only dentists can provide. This is why other countries have built-in safeguards for patients seeking access to dental team members, which include a certificate of oral health or a prescription for treatment from a dentist.

Recommendation 2, 5, and 8: Allow dental hygienists, dental technicians and clinical dental technicians to be eligible for reimbursement under the State dental schemes.

With respect to payments to dental technicians, clinical dental technicians or dental hygienists under the State funded schemes, medical card holders should not be precluded from obtaining dental care from dentists under such schemes. It follows that such practitioners should be appropriately indemnified.

Recommendation 6: Officially recognise the profession of Clinical Dental Technician

The Dublin Dental School and Hospital supports the principle that every person who practises dentistry should have appropriate clinical training and have achieved competence in their area. Dental technicians experienced in the non clinical areas need to complete appropriate clinical training prior to passing an examination that permits them to practise directly to the public. There should be no circumstances in which someone who has not had appropriate clinical training should be allowed to practise on patients. It will be necessary to provide conversion training for experienced dental technicians who wish to become clinical dental technicians.

Recommendation 9: Review of the number of training places for dentists.

The Dublin Dental School and Hospital supports the recommendation to undertake a review of the number of training places in dentistry. This review should examine entry portals and training as well as work force planning relating to all members of the dental team. It should also examine issues around the funding of these training places. Such a review should be undertaken as soon as possible as educational strategies would be contingent of such a review. However there are obviously financial resource implications should a recommendation be made to increase the number of training places for dental team members.

Recommendation 12: Change the composition of the Dental Council.

An essential prerequisite to any proposed reforms of the practise of dentistry in Ireland is the reform of the 1985 Dentists Act. This reform should have patient safety as the main a focus; other reforms should include disciplinary process for all members of the dental team and licensing of premises where dentistry is practised. The Dental Council can only investigate on foot of a complaint. It has no role in licensing or inspecting of premises where dentistry is practised. The Dublin Dental School & Hospital would welcome ongoing re-accreditation of dental team members through Continuing Professional Development. Reform of the 1985 Dentists Act should also include a revision of the composition and operation of the Dental Council to include other members of the dental team as well as wider consumer representation.

In conclusion the Dublin Dental School and Hospital welcomes the findings of the report and the opening of a debate into the widening of access for the public to members of the dental team provided high quality patient care and patient safety are the priorities in all reforms.

Should you wish to discuss any of the aforementioned points please do not hesitate to contact me.

Professor Noel Claffey
Dean
Dublin Dental School and Hospital.