

Tuesday, 21 February 2006

The Competition Authority
Parnell House
14 Parnell Square
Dublin 1

Re: Competition in Professional Services – Preliminary Report on Dentists

Dear Ms. McDonnell,

Thank you for your correspondence dated 15th December, 2005. The Irish Dental Nurses Association Executive Committee has reviewed the document that you enclosed for comment. We feel as a whole that the profession of Dental Nursing has not been acknowledged in this document. After review, we feel that some of the main issues arising could be rectified by including our profession as a valued, capable member of the dental team.

To clarify, we have summarised the main issues in the document, in relation to Dental Nurses are:

- high cost, and non-regulation of the cost of dental treatment throughout the country
- access to dental care by the general public
- lack of public access to orthodontic treatment

Our recommendations, in relation to our profession, are as follows:

Create a statutory register for Dental Nurses

- 1 will open up the opportunity for introducing expanded, intra-oral duties for dental nurses, which will:
 - allow more patients to be seen in a normal working day – increasing availability to dental treatment as well as lowering the cost of treatment
- 2 better usage of the dentists skills, expertise and time, allowing more time for routine and specialist treatment, thereby increasing the amount of patients seen and reducing the cost of treatment provided by a Dental Nurse (i.e. expanded duties: rubber cup polishing, fluoride application, preliminary dental impressions, sealant application, rubber dam application, matrix placement, dietary instructions, oral hygiene instructions, radiography and liner and base application)
- 3 parallel practices in United States, Canada and Sweden.
- 4 currently Dental Nurses are allowed to practice in Ireland without a qualification. The primary role of the Dental Nurse is to provide a safe environment for the patient. This includes responsibilities for infection control, cross contamination and the prevention of disease transmission. These responsibilities include the surgery decontamination, zoning, instrument decontamination, instrument packing and sterilisation. Poor infection control practices will result in the exposure of patients and staff to infectious diseases, particularly those immuno-compromised and medically compromised.

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- 5 Increasing the responsibility of the Dental Nurse, by introducing a statutory register, with a mandatory continuing-education requirement. This will provide the public with the peace of mind that the whole dental team is trained to an acceptable standard in their specific area, rather than ad hoc training.
- 6 it is worth noting that many Dental Nurses are employed as practice managers, which requires an in-depth knowledge and skill.

The above recommendations would have a direct correlation to the amount of orthodontic therapists (orthodontic dental nurses) trained in Ireland

- 1 if expanded duties were part of the core training of dental nurses the amount of time for a post-qualification to become an orthodontic therapist would be reduced – which will affect the amount of orthodontic therapists that can be trained
- 2 without a statutory register and intra oral duties introduced for Dental Nurses, there could be registration issues with orthodontic therapists (orthodontic dental nurses)
- 3 there would be more of a pool of people eligible to become orthodontic therapists and result in more trained
- 4 In the document – it is recorded that there are 332 Dental Nurses on the voluntary register for Dental Nurses, and 277 on the statutory register for Dental Hygienists. An important distinction to make is that the number on the dental hygiene register is reflective on the amount of dental hygienists in the country, but the Dental Nurses register is not reflective of the amount of qualified Dental Nurses in Ireland. Since the pool of Dental Nurses is far larger than the Dental Hygienists, it would be prudent to create this expanded role for Dental Nurses.

Retention of people staying in the Dental Nursing profession is a problem:

- 1 if intra-oral duties were introduced, this may retain nurses in the profession – many nurses migrate to the dental hygiene profession because of the ability to work intra-orally
- 2 the migration rate of dental nurses leaving the profession will have a direct correlation between the amount of orthodontic therapists that may also leave the profession to pursue dental hygiene
- 3 in our opinion, we feel we are the most progressive discipline in responding to the demand of the general dental community. In the past two years a new Dental Nursing programme was created to meet the demands for qualified Dental Nurses in the country. This resulted in doubling the number of suitably trained Dental Nurses in Ireland.

Recommend a member of the Executive Committee of Irish Dental Nurses Association to be a member on the Dental Council of Ireland

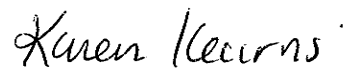
- 1 this would allow representation from the professional body for Dental Nurses in Ireland to be included in decisions that affect the dental community as a whole

To summarise our recommendation, we feel that by sharing duties and responsibilities between the Dentist, the Dental Nurse and the Dental Hygienist, this will increase job satisfaction for all disciplines, be more time efficient, draw on expertise of each member of the dental team, create a safer environment for the dental patient and increase competition in the dental field while offering the general public access to quality, affordable dental care. As the professional for Dental Nurses in Ireland we

would express our main interest and focus is to maintain a high standard of welfare and health and safety of the dental patient. With the current legislation allowing unqualified Dental Nurses to practice, this raises the issue of health and safety to the general public.

Please do not hesitate to contact me with any queries regarding the above.

Sincerely,

A handwritten signature in cursive script that reads "Karen Kearns".

Ms. Karen Kearns
I.D.N.A. Secretary