

10 March 2023

Ms Robyn Kruk AO
Independent reviewer
Health practitioner regulatory settings

Email: healthregreview@finance.gov.au

Dear Ms Kruk

Please find attached the submission from the Australian Dental Council regarding the Consultation Paper regarding the review of regulatory settings relating to registration and qualification recognition for overseas health practitioners.

Please do not hesitate to contact us should you require any additional information.

Best wishes



Veronica Vele
Director, Assessments and Examinations

Review of regulatory settings relating to registration and qualification recognition for overseas health practitioners

The Australian Dental Council (ADC) is the body assigned the accreditation functions for the dental professions by the Dental Board of Australia (DBA) under the National Registration and Accreditation Scheme (NRAS). The ADC is responsible for the accreditation of education and training programs and the assessment of overseas qualified dental practitioners wishing to practise in Australia. This response is submitted by the ADC with relation to the dental professions.

1. The review is considering recommendations to ease skills shortages in registered health professions including medicine, nursing, midwifery, psychology, pharmacy, occupational therapy and paramedicine on the basis of current and projected labour market shortages.

1a. Do you agree there are current and/or projected skills shortages in these professions?

The ADC acknowledges that there is a maldistribution of dental practitioners, and a particular need to support rural and remote communities in accessing oral health services. In addition, the ADC also recognises the increased need for some specialist dentists, including Special Needs dentists. A shortage of dental assistants, a profession that is not regulated, also impacts dental services, particularly in the public sector.

1b. If yes, is there any data or evidence you can provide to demonstrate these shortages?

The data sources are limited and the most accurate information is located on the Australian Institute of Health and Welfare website here. This data set concludes in 2019, prior to the pandemic. The ADC has experienced an significant increase in applications from overseas qualified dental practitioners seeking to register in Australia via the assessment pathway. Application numbers for general dentistry and dental hygiene have more than doubled since 2019.

2. What, in your view, are the key strengths and weaknesses of the current regulatory settings relating to health practitioner registration and qualification recognition for overseas-trained health practitioners?

In 2018 the ADC undertook work on behalf of the Dental Board of Australia to consider the model for assessments of overseas qualified dental specialists seeking to register in Australia. One of the barriers we identified in that project was the need to first register as a general dentist (and therefore the need to complete the ADC assessment process) prior to applying for assessment for registration as a specialist. There are opportunities to streamline recognition as a specialist, particularly in high priority specialist areas such as Special Needs dentistry, while maintaining public safety. The Dental Board of Australia currently conducts the assessment of overseas qualified dental specialists seeking registration in Australia while the ADC assesses all other applicants from overseas seeking registration as a dental practitioner. The ADC understands the Dental Board of Australia is preparing to review its registration standards.

There is no articulated substantially equivalent pathway for the dental professions. The ADC could undertake this assessment at the point of initial assessment, and if candidates do not meet the threshold, they can proceed via the assessment for competence process already administered by the ADC. To a candidate this would be one process even though under the National Law this is articulated under different sections.

There is also a seemingly arbitrary nature of the appointment of the skills assessing authority for health occupations. For example, the ADC undertakes skills assessments for dentists and dental specialists, however VETASSESS is the

assessing authority for all other divisions of dentistry. For general dentistry, skills assessments are conducted concurrently with the assessment process, thus avoiding any unnecessary delays and allowing overseas qualified dental practitioners to apply for their skilled migration visas as soon as they successfully complete the last stage of their assessment process. By relying on separate organisations to manage the two processes, delays are inevitably introduced as well as additional barriers, e.g. an applicant could successfully complete their competency assessment but not be provided with a positive skills assessment or vice versa. The dental professions are not currently listed on any skilled occupation list as an in demand profession.

3. During the pandemic, a range of regulatory settings and processes relating to registration and qualification recognition of overseas-trained health practitioners were temporarily waived, relaxed or had greater flexibility.

3a Are there settings or processes that were particularly beneficial or challenging from a professional or employer perspective?

The ADC did not change the threshold at which we assessed overseas qualified dental practitioners, or accredit dental practitioner programs during the pandemic.

For the overseas qualified dental practitioner assessment process we implemented the following policies in the rapidly changing environment of COVID-19:

- Extension of the validity of a successful completion at the written examination in order to enable candidates an opportunity to complete the practical examination
- Introduction of a dedicated candidate support team to facilitate and support candidates engaging with the assessment process
- Establishment of a Candidate Reference Group with representation across the geographical locations of our candidates
- Amendments to our withdrawal policies to provide greater flexibility to candidates and to ensure no one with COVID-19 presented for an examination
- Delivery of examinations regardless of the number of candidates in a session
- Increased screening and safety measures for COVID-19
- Increased number of examination sessions

The challenge with a number of these initiatives is that they were at the cost of the ADC (such as refunds even though work had been done, cost of the additional protocols for COVID-19, increasing candidate:examiner ratios when delivering examinations with fewer candidates, etc)

The ADC also provided support and worked collaboratively with Australian institutions to ensure programs continued to meet accreditation standards and students were able to graduate with the necessary skills to be safe dental practitioners entering the workforce.

Any challenges experienced during the pandemic were outweighed by the benefits achieved, i.e. the ADC was able to continue to fulfil its accreditation function, ensuring new dental practitioners could enter the workforce, either through completion of an accredited Australian qualification or the ADC assessment process for overseas qualified dental practitioners.

3b. Do you believe any of these temporary changes were beneficial or potentially detrimental to patient safety?

We don't believe the flexibility we introduced was detrimental to patient safety, which has been and remains the key consideration in any decision making, during a pandemic or not.

3c What opportunities/challenges may arise if these settings and/or processes are retained permanently?

The introduction of our candidate support team was a wonderful initiative and will remain a feature of the support we provide to our candidates. As a result of the introduction of this dedicated team, we have found the processing time for initial assessments has reduced from up to 6 months at the peak of the pandemic to less than 4 weeks now with increased accuracy in the provision of what candidates submit.

The ability to deliver examinations on our premises, in our examination centre, continues to allow us to scale up or down according to demand and to ensure we can meet capacity without causing delays for candidates undertaking the assessment process. Prior to the availability of the ADC examination centre in Melbourne, the

maximum number of overseas qualified dental practitioners we could assess for the practical examination was 850. The ADC has the capacity to more than double these numbers if required, and deliberately designed the examination centre with the flexibility to meet expansion/contraction trends. The ADC delivered 61 practical examinations in the 2022 calendar year.

4. The end-to-end process for overseas health practitioners seeking to work in Australia can be complex, time-consuming and costly. Current regulatory requirements may set unduly restrictive barriers, which in turn may deter potential practitioners from seeking to work in Australia.

4a. Do you agree with this premise? If so, why?

The ADC is committed to ensuring overseas qualified practitioners wishing to practice in Australia have the opportunity to complete all stages of the assessment process within 10-12 months from the time of application.

The opening of the ADC exam centre has been key to making this possible, as indicated in the response to the previous question. Having a purpose-built facility means that the ADC can not only increase capacity depending on demand but is also able to guarantee a standardised examination delivery for all candidates. Examination sessions are run according to the same processes and procedures, offering candidates the same experience and the same tools and equipment. The ADC provided expertise and advice to the National Dental Examining Board of Canada, and they have recently opened their own examination centre modelled on the ADC's.

Cost is a perceived barrier and often candidates believe they need to engage with expensive preparatory courses to succeed in the examination. In addition, candidates already based in Australia are not able to work as dental practitioners until successful completion of the assessment process and may need to seek employment in a field that is not related to the dental profession. This is the same in most international jurisdictions for dentistry.

Appendix 1 maps the dentistry assessment processes for comparable jurisdictions internationally. The ADC process is of similar or lower cost and has the flexibility for candidates to be a faster pathway to registration due to the availability and frequency of the assessment stages in our process (no caps and more frequent delivery). For dentistry, the ADC does not consider its assessment process to be the part of the migration pathway which is inefficient or costly and that processing times in relation to visas and provider numbers should be considered.

During COVID-19, the ADC understands that it was the only international jurisdiction to continue to assess overseas qualified dental practitioners. Canada, UK and New Zealand (using the Canadian examination) did not run examinations for two years.

4b. What practical changes could be made to current regulatory settings to most significantly improve the end-to-end process:

- i. Over the next 12 months**
- ii. In the medium-to-longer-term?**

The Dental Board of Australia does not have any limited registration provisions for overseas qualified dental practitioners. If there was a workforce imperative, then consideration could be made by the Dental Board of Australia to introduce limited registration under supervision while still engaging in the examination process. A Public Sector Dental Workforce Scheme was established in 2005 and closed in 2019. The applicants worked under supervision in public sector dentistry while engaging with the ADC assessment process.

There is one competent authority recognised in Australia (Canada). The recognition is for graduates from Commission on Dental Accreditation of Canada (CDAC) accredited dental programs enabled through a Memorandum of Understanding between CDAC and the ADC. The ADC also recently undertook a research project for the Dental Board of Australia to expand its list of approved programs to include a broadened list of qualifications from the UK, Republic of Ireland and New Zealand across all divisions of dentistry. The ADC could undertake further work to expand this list at the request of the Dental Board of Australia.

5. If you are an overseas health practitioner or employer – are there any thoughts you would like to share in terms of your experience of the end-to-end process for working in Australia or employing an overseas-trained health practitioner?

N/A

Appendix 1:

A comparison of overseas qualified dental practitioner pathways to general dentistry registration in Australia, Canada, Ireland, UK and New Zealand

Australia

Process	Stages	Assessment content	Timing	Capacity	Location	Costs	Min timeframe from application to completion
<p>Overseas qualified dental practitioners wishing to practise in Australia need to complete a 3-stage assessment process. Each step of the process needs to be completed before advancing to the next.</p> <p>Total cost: \$7110 AUD</p> <p>Website reference: www.adc.org.au</p>	Initial Assessment	Assessment to verify candidate identity, qualifications, registration and good standing	Applications can be submitted anytime online Processing time: 4 weeks	No cap	Apply online anywhere	\$610 AUD	<p>10-12 months *</p> <p>The timeframe above assumes candidates pass each stage at first attempt.</p> <p>Candidates who fail a step can repeat it within a 12-month window.</p>
	Written Examination	Scenario based, Multiple-choice question (MCQ) exam testing the application of knowledge of the science and practice dentistry	March and September	No cap	Pearson Vue testing centres worldwide	\$2000 AUD	
	Practical Examination	10 objective structured clinical examinations (OSCEs) plus 6 technical assessment tasks on manikins in a simulation clinic, testing the demonstration of clinical and technical skills in dentistry	Exam is held throughout the year	1500 places per year – these can increase based on demand Candidates can sit twice in 12-month period	Melbourne – ADC examination centre	\$4500 AUD	

Process	Stages	Assessment content	Timing	Capacity	Location	Costs	Min timeframe from application to completion
<p>Overseas qualified dental practitioners wishing to practise in Canada need to complete a 4-stage assessment process. Each step of the process needs to be completed before advancing to the next.</p> <p>Total cost: \$12250 CAD/~\$13300 AUD</p> <p>Website reference: https://ndeb-bned.ca/</p>	Credential verification	Assessment to verify candidate identity, qualifications, registration and good standing	Applications can be submitted anytime Processing time: 18 weeks	No cap	Apply online anywhere	\$900 CAD	11-12 months* The timeframe above assumes candidates pass each stage at first attempt.
	Assessment of fundamental knowledge (AFK)	Multiple-choice question (MCQ) exam testing biomedical science and applied clinical science knowledge	February and August	Information not publicly available	Paper based in Canada and online at select Prometric test centres in the US, Australia and New Zealand	\$1000 CAD	Candidates need a minimum of 7-8 months to complete the examinations alone.
	Assessment of clinical judgement (ACJ)	Multiple-choice question (MCQ) exam testing the ability to formulate a diagnosis and make clinical decisions, as well as evaluate knowledge in oral radiology and the ability to make a radiographic interpretation and diagnosis.	May and November	Limited places - allocated on a first come first serve basis	Online at select Prometric test centres in Canada and New Zealand	\$1350 CAD	
	Assessment of clinical skills (NDECC)	10 situational judgement stations plus 7 clinical requirements on simulated patients testing clinical skills and techniques and problem-solving skills in work related situations	Exam is held throughout the year	Information not publicly available No limit on the number of sittings over a 5-year period	Ottawa – NDECC Test centre	\$9000 CAD	

Ireland

Process	Stages	Assessment content	Timing	Capacity	Location	Costs	Min timeframe from application to completion
<p>Overseas qualified dental practitioners wishing to practise in Ireland need to complete a 2-part examination. Part 1 needs to be completed before advancing to Part 2.</p> <p>Total cost: 1500 EUR / ~ \$2300 AUD</p> <p>Website reference: http://www.dentalcouncil.ie/</p>	Part 1 examination	3 written papers in short answer question format assessing health, disease and society content, plus a practical examination testing operative dentistry techniques	<p>Applications can be submitted once per year, usually in February and require evidence of candidate identity, qualifications and good standing</p> <p>Exam is held once per year, usually March/April</p>	Limited places - allocated on a first come first serve basis	Dublin	1500 EUR in total for both Part 1 and Part 2	<p>6 months*</p> <p>The timeframe above assumes candidates are able to secure a place in the examination and pass each part at first attempt.</p> <p>Candidates who miss out or who do not successfully complete either part of the examination need to wait until the following year.</p>
	Part 2 examination	1 written paper in short answer question format and clinical vivas assessing Restorative Dentistry, Oral Surgery/Oral Medicine and Child Dental Health, plus OSCEs testing diagnosis, treatment planning and clinical decision-making	Exam is held once per year, usually June/July	Same as part 1	Cork		

United Kingdom

Process	Stages	Assessment content	Timing	Capacity	Location	Costs	Min timeframe from application to completion
<p>Overseas qualified dental practitioners wishing to practise in the UK need to complete a 2-stage assessment process. Each step of the process needs to be completed before advancing to the next.</p> <p>Total cost: 3735 GBP / ~\$6600 AUD</p> <p>Website reference: https://www.gdc-uk.org/</p>	Overseas Registration Exam (ORE) Application form	Assessment to verify candidate identity, qualifications, registration and good standing	<p>Applications can be submitted anytime</p> <p>Processing time: 4 weeks</p>	No cap to join the list to register for the ORE	Apply online anywhere	Sources other than GDC indicate a fee of 685 GBP applies. This cannot be verified on the GDC website	<p>6-12 months*</p> <p>The timeframe above assumes candidates pass each stage at first attempt.</p>
	Overseas Registration Exam (ORE) Part 1	2 written papers in short answer question format testing the application of knowledge to clinical practice	Exam is held twice per year, usually April and August	Limited places - no more than 200 candidates per session.	London	806 GBP	
	Overseas Registration Exam (ORE) Part 2	Objective structured clinical examinations (OSCEs) plus 3 technical assessment tasks on manikins, a diagnostic and treatment planning exercise and a medical emergency assessment, all testing practical clinical skills	Exam is held three times per year, usually January, April and September	Limited places - no more than 150 candidates per session	London	2929 GBP	

New Zealand

Overseas qualified dental practitioners wishing to practise in New Zealand are required by the Dental Council of New Zealand to complete the National Dental Examining Board of Canada (NDEB) Equivalency Process. Please refer to the information provided under Canada for further details.

As an alternative, candidates can also complete the ADC process or the US licensing examination.

Website reference: <https://www.dcnz.org.nz/>