

From: Radu Goga  
Sent: Thursday, 1 September 2016 10:24 p.m.  
To: Consultations  
Subject: Draft Sedation Practice Standard

Follow Up Flag: Follow up  
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Dear Sir/Madam,

I wish to comment regarding the proposed competencies for providing sedation and monitoring-only of a sedated patient in the draft Sedation Practice Standard.

On p22 of the draft standard it states that:

*"The University of Otago Bachelor of Dental Surgery qualification is considered sufficient education and training to provide and monitor nitrous oxide/oxygen and oral sedation, subject to the practitioner maintaining competence in these areas. Additional formal education and training is required to provide IV sedation."*

*"Practitioners who have completed alternative formal education and training are responsible for determining whether it has enabled them to meet the competencies defined in Appendices B and C, to provide sedation or monitor-only sedated patients."*

Firstly, it is not clear from the above statements if the Council is fully satisfied that the BDS (Otago) course does in fact ensure that a new graduate has the competencies in Appendix B. In other words is a new graduate seen as competent by the Council to deliver oral sedation to a Moderate level, with their only need for further training being the IV route if they so wish? This is very unlikely to be the case, and it would be far better and safer if the BDS (Otago) qualification was seen as sufficient for the competencies in Appendix B, but only up to an intended level of Minimal sedation.

Secondly, and following on from the above point, both IV and intended Moderate sedation should be seen as needing further "formal education and training" to meet the competencies in Appendix B. IV/Moderate sedation should be treated as a stand-alone group as the two often go hand-in-hand, and it is the advanced education and training within the current NZ Society for Sedation in Dentistry Conscious Sedation training course that teaches one how to manage Moderate sedation.

Thirdly, while the requirement for further education and training for IV sedation is to be expected, by no longer specifying what the "*alternative formal education and training*" should be (which the current standard does), it puts the dental profession in legal no-man's land and potentially endangers the safety of the New Zealand public.

The Dental Council rightly stipulates which degree/qualification allows clinicians to practice in New Zealand, and more specifically allows them to provide nitrous oxide/oxygen and oral sedation (which as stated above should be at a Minimal level). The Council also rightly stipulates which NZRC Core training is needed for providing any form of sedation and/or monitoring.

In my opinion the Dental Council should therefore continue to stipulate that successfully completing the NZ Society for Sedation in Dentistry Conscious Sedation training course - as a minimum - is the required course/standard for meeting the legal requirements for IV training, as well as being sufficient for meeting the competencies in Appendix B up to an intended level of Moderate sedation by any route, where such competence has not been gained or maintained.

If the only course in New Zealand that provides the training to meet the competencies for IV/Moderate sedation is dis-accredited after 10 years, it can only be assumed that it is now insufficient for meeting those competencies. We then as a profession have no way of knowing with certainty what the IV/Moderate Sedation training in New Zealand should be and puts us at a potential medico-legal risk.

Insofar as far as the public is concerned, by removing the current stipulation this creates a real danger of under-trained clinicians without true competency providing IV/Moderate sedation at a level of risk that was never intended by the Council or the profession.

The current (2006) Standard states on page 5:

*"The clinician is to be one of the following:  
7.1 A dentist who has successfully completed relevant training leading to at least the equivalent of the New Zealand Society for Sedation in Dentistry's Conscious Sedation Course."*

This course is the only course we have in New Zealand that provides the training for IV/Moderate Sedation competencies. The existing statement should be maintained and expanded to read:

*"The clinician providing IV or intended Moderate sedation by another route is to be one of the following:  
A dentist who has successfully completed relevant training leading to at least the equivalent of the New Zealand Society for Sedation in Dentistry's*

*Conscious Sedation Course."*

In so doing it brings clarity to both the profession and the public, and maintains public safety.

Your sincerely,

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