Dear Dr Lockwood

Re: Consultation on entry level competencies for conscious sedation endorsement of registration

Thank you for your invitation to make a submission in relation to the above confidential consultation.

The Australian and New Zealand College of Anaesthetists (ANZCA), including the Faculty of Pain Medicine, is committed to high standards of clinical practice in the fields of anaesthesia and pain medicine. As the education and training body responsible for the postgraduate training programs of anaesthesia and pain medicine for Australia, New Zealand and parts of Asia, we believe in ongoing continuous improvement and strive to ensure our programs represent best practice and contribute to a high quality health system.

Some general feedback on the document is outlined below.

Conscious versus procedural sedation.

ANZCA notes that the Dental Board of Australia has adopted the definition of Conscious Sedation from PS09 Guidelines on Sedation and/or Analgesia for Diagnostic and Interventional Medical, Dental or Surgical Procedures. However it is important to recognise that the sedation spectrum is a continuum from anxiolysis to general anaesthesia and that patients may transition from one state to another with sometimes unpredictable ease. ANZCA suggests that the DBA may wish to give consideration to adopting the phrase ‘procedural sedation’ as an overarching phrase for this practice.

Standards of Practice

ANZCA recognises procedural sedation is widely employed as a technique to improve patient tolerance of a vast range of diagnostic and therapeutic procedures. In Australia and New Zealand, procedural sedation outside the operating room environment has occurred for many years but is becoming more prevalent for increasingly complex procedures and/or increasingly complex patients. There are now many clinician groups who provide sedation to improve procedural success rates and patient tolerance.
Until recently, ANZCA has been one of the very few providers of any minimum standard of practice on procedural sedation with the publication of PS09. Most of the other healthcare bodies (Colleges, Medical and Dental Boards, health authorities) in Australia and New Zealand refer to this document when issuing practice guidelines on procedural sedation. Other than the ANZCA document, there are local and regional guidelines and standards but no overall minimum or fundamental standards on procedural sedation published that cover practice in Australia and New Zealand.

Two recent publications are helping to bridge this gap. They are:

- **“Minimum Standards for Safe Procedural Sedation”, produced by the NSW Agency for Clinical Innovation (ACI)**
  This document provides three Standards of Care relevant to the procedural sedation pathway and provides a toolkit for non-critical-care physicians providing procedural sedation outside the operating room suite.

- **“Safe Sedation Practice for Healthcare Procedures; Standards and Guidance” produced by the Academy of Medical Royal Colleges.**
  This document sets out a “Fundamental Standard” that all healthcare practitioners should comply with when providing procedural sedation and a set of specimen learning competencies, derived from the Royal College of Anaesthetists 2010 “Curriculum for a CCT in Anaesthetics.”

The consultation document from the DBA states that there are currently 91 dentists endorsed for this practice. While this number is a relatively low percentage of the total number of registered dentists in Australia it is likely that that this will grow over time.

ANZCA is therefore supportive of the development of entry level competencies for endorsed conscious sedation / procedural sedation dentists.

**Future ANZCA Work plan**

ANZCA is committed to continuing to be a leader in the safety and effective use of procedural sedation. We will shortly commence work to develop clearly stated learning outcomes to support the practice of safe sedation. This will include a common standard of education across all clinician groups providing such care and it is intended that specific sedation competencies will be included in the next review of our own training curriculum.

Furthermore ANZCA will continue to engage with the regulatory authorities who oversee the practice of sedation to ensure that the public continues to receive safe and appropriate care.

When PS09 is next revised:

- Early engagement with other stakeholders will occur to ensure a greater sense of ownership and engagement. These stakeholders will include dentists, nursing staff and practitioners “at the coal-face”.
- Emphasis will be on competencies.
- In relation to drugs, emphasis will be on classes of potential drug effects, rather than naming specific agents.
In relation to training, emphasis will be on achieving competence, rather than completing a specified period of training time.

The answers to your specific questions are outlined below:

1. **Is the purpose of the proposed competencies understood?**
   
   Yes.

2. **Is the content and structure of the proposed competencies clear?**
   
   Yes.

3. **Does any of the content need to be changed or removed? If so, provide details**
   
   No.

4. **At the moment some of the competencies relate to the competencies of general dentists. Should the competencies only include those specific to the practice of conscious sedation (i.e. those in addition to the ones expected of general dentists)?**
   
   Yes. It would be appropriate for an acknowledged second tier of more highly trained dentists who provide safe sedation to have a separately defined series of competencies over and above general dentists.

5. **Do you have any other comments on the proposed competencies?**
   
   No.

6. **How often do you think the competencies should be reviewed? E.g. every three years, every five years**
   
   A three yearly review would be most appropriate in an area of rapid change.

Thank you for the opportunity to provide feedback. ANZCA will be pleased to be further engaged after the public phase of consultation. Should you require any further information, please contact Virginia Lintott, Senior Policy Adviser via email vlintott@anzca.org.nz or telephone +61 3 9510 6299.

Kind Regards

Genevieve Goulding
President