

YOUR OPINION COUNTS...

MAKING YOUR SUBMISSION TO HPRAC:

PLEASE ATTACH THE FOLLOWING INFORMATION SHEET TO YOUR SUBMISSION TO HPRAC. YOUR SUBMISSION SHOULD BE SENT NO LATER THAN APRIL 15, 2008, TO:

Annie Schiefer, Project Manager
Health Professions Regulatory Advisory Council
55 St. Clair Avenue West
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We prefer submissions to be made in Microsoft Word, either on disk (by mail) or by email when possible. Electronic submissions can be made to: HPRACSubmissions@ontario.ca. If fax is more convenient for you, please address your comments to: HPRAC, INTERPROFESSIONAL COLLABORATION PROJECT, at 416-326-1549. Hard copy submissions should be sent to the above address.

Submission Details:

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Please note that complete submissions or excerpts may be referenced in HPRAC's report to the Minister of Health and Long-Term Care, and that they will be posted on HPRAC's website. All submissions and correspondence may be the subject of a request under the Freedom of Information and Protection of Privacy Act (FIPPA). If you wish any part of your response, submission or correspondence to be withheld, please indicate that and provide the reason for your request.

This sheet can be downloaded with the full Discussion Guide (PDF format) from the HPRAC website, <http://www.hprac.org>, in the Interprofessional Collaboration section under Current Ministerial Referrals.

**Submission from the College of Dental Technologists of Ontario
April 30, 2008**

Defining Interprofessional Collaboration

As one of the Colleges that falls under the Regulated Health Professions Act (RHPA) we welcome an opportunity to respond to the questions provided by HPRAC. As a Regulatory College our sole focus is the regulation of dental technologists for the interest of public safety. We continuously explore as many avenues as possible that will ensure the public interest is not compromised through the conduct of our professional members.

As time and circumstances have changed since the implementation of the RHPA in 1991 we are anxious to ensure that the regulations continue to meet the needs of the public interest and that those who are registered with this College have the competence to meet those needs. Sometimes that has involved collaboration with others in both the College and professional arenas. For example, only recently this College along with three others (Denturists, Dentists, Hygienists) met together with the Chief Dental Officer at Health Canada to explore avenues whereby our four Colleges and Health Canada could better educate our members and the public about products obtained from sources outside Canada. We were of one mind in wanting to ensure that the public would be informed about such products and protected from those that might be harmful.

We also continue to explore avenues whereby the public will be served best through the joint efforts of Dentists and Dental Technologists when areas of practice overlap. While we would welcome an opportunity to explore the area of "scopes of practice" we attempt to collaborate with our colleagues under the terms of the current legislation to ensure that the public is well served.

We are sure that there is only good intent in HPRAC's exploration of models in other jurisdictions but our own research has led us to believe that the current legislation here in Ontario is one of the best in the world and do not feel that these other models, as a whole, provide sufficient improvement for implementation here. That being said we are open to improvements or selections from other venues that might be offered and will gladly work with the Ministry to achieve those improvements.

Eliminating the Barriers to Collaboration among the Colleges

In general, collaboration among professionals and among Colleges is not prevented in the RHPA. However, there are circumstances and situations which limit such collaboration. Confidentiality is a major one. Collaborating with investigations in a multi-disciplinary setting can be accomplished but individual discipline must be meted out by the individual College and information surrounding a member cannot be shared with

another.

Liability Issues

It is our opinion that liability is not a barrier to Interprofessional care but we do believe that professional liability insurance should be left to the associations rather than become part of legislation or a College regulation.

Developing Enablers for Collaboration among the Colleges

The RHPA is a good document that allows for many areas of collaboration but sometimes lacks the flexibility that would enable Colleges to collaborate in more areas. Of greatest importance is for legislation that would allow Colleges to coordinate activities, without jeopardizing their responsibilities under the RHPA or other specific legislation. We do not feel that we can comment on support for new Colleges or administration responsibilities.

Structural Mechanisms

Where commonalities exist a common framework for complaints and investigations may be quite advantageous. However, it should be the responsibility of each College to ensure appropriate discipline is carried out.

Since our members do not generally work in a multidisciplinary setting we do not feel that we can comment on these questions.

Quality Assurance

Ultimately the question must be asked, "What is the role of the College in Quality Assurance?" Is the College's role to ensure that competently prepared individuals are admitted to practice their profession in Ontario? Is it to ensure that those same individuals continue to maintain competency? Is the role to require registered members to improve their skills beyond the level of competency to that of excellence?

It is possible that these questions could be answered differently by different Colleges and thus a joint quality assurance program would not be suitable. It is our understanding that we are to ensure the public safety through the registering and monitoring of our members. Education, skill development, and excellence in the profession are by-products not primary goals.

We are quite willing to share resources, expertise and common areas of Quality Assurance. It should be an opportunity for individual Colleges to explore without hindrance of legislation.

Standards of Practice and Professional Practice Guidelines

It is our belief that there is already an organization in existence that facilitates and supports collaboration among the Colleges: the Federation of Health Regulatory Colleges of Ontario. Through this body Colleges are able to share ideas and receive support for joint activities. The FHRCO promotes collaboration and takes a leadership role in sharing best practices among all Colleges.

We are in favour of self-regulation and would not want to put anything place that jeopardizes such a model.

Reporting to the Minister and/or the public on matters of collaboration seems to be an unnecessary burden of work. So many aspects of collaboration exist from simple joint efforts (on mutual areas of interest) to elaborate mechanisms (such as dispute resolution) that are aspects of daily life in a College. They are the norm and should not require specific reports to the Ministry or the public as though they were abnormal activities for special attention and on which a specific report must be made.

Where the scope of practice and controlled acts are the same each College should be held to the same standard.

New structures need not be implemented for collaboration to take place since it already occurs under the current one. The suggestion to place professions with common areas of focus into one College is not necessarily advantageous. While the area may be common the activity is not. Because two Colleges deal with teeth does not mean that they share all areas of activity: scaling is not the same as providing a dental appliance.

Tools and Templates

This is not an area we feel we can comment on.

College Autonomy, Authority and Accountability

Providing the Colleges opportunities to place needed guidelines into bylaws is one possibility. In addition there is a need to have legally enforceable standards of practice. The RHPA could be modified to give each College statutory rule-making powers to enforce the creation and enforcement of standards of practice. When such authority is exercised the suggested standards should be circulated among related health colleges for comment. The final document should then be provided to the Ministry.

Interprofessional Care at the Clinical Level

The Role of Colleges in Promoting Interprofessional Care at the Clinical Level

When Colleges collaborate a sense of enablement occurs which reduces barriers at the professional level. For instance, when the four oral health Colleges collaborate on an issue such as the importing of illegal dental devices, the professionals within each College are confident to collaborate with colleagues knowing that all the Colleges hold to the same standard.

Developing Regulatory Enablers for Interprofessional Care at the Clinical Level

No comment