

24 November 2022

Joshua Maldon
Department of Health and Aged Care
Australian Commission on Safety and Quality in Health Care
Level 5, 255 Elizabeth Street
Sydney NSW 2000

By email: QualityAgedCare@health.gov.au

Dear Mr Maldon,

Thank you for considering the Australian Dental Association's (ADA) feedback on the Department of Health and Aged Care's Revised Aged Care Quality Standards document of Oct-Nov 2022 (consultation).

The ADA is the peak representative body for dentists in Australia. Our 17,000 members include dentists working across the public and private sectors, in 14 specialty areas of practice, in education and research, operating more than 7,500 small businesses, as well as dentistry students currently completing their entry-to-practice qualifications.

We welcome the inclusion of oral health requirements within Standard 5: Clinical Care. To ensure appropriate oral health care is provided in aged care settings, we recommend strengthening the draft oral health actions which are intended to apply to providers, described at section 5.4.13 of the consultation paper, and reproduced below:

Oral health

5.4.13 The provider implements processes to ensure:

- a) timely clinical oral health assessments are conducted*
- b) referral to oral health professionals when required*
- c) access and use of products and equipment required for daily oral hygiene.*

We suggest this section be amended, and offer the following suggested wording:

Oral health

5.4.13 The provider implements processes to ensure:

- a) an oral health assessment is conducted immediately prior to, or within one month of resident admission, by a dentist or other registered dental practitioner
- b) a clinical oral health assessment is conducted at-least annually, by a dentist or other registered dental practitioner
- c) timely referral to a dentist or other registered dental practitioner for comprehensive clinical care when required
- d) patient care and management plans include the maintenance of oral health
- e) eligibility for public dental care, eligibility for DVA dental services, and the patient's usual general dental practitioner are recorded
- f) access to, monitoring of stock levels, replenishment as required, and assistance to use salient products and equipment required for daily oral hygiene.

In making these suggestions, we are mindful of the Aged Care Royal Commission's Final Report, Recommendation 19: urgent review of the aged care quality standards, specifically as it pertains to requiring best practice oral care.

We would be most happy to discuss the comments provided herein. Should you have any questions, please do not hesitate to contact Mr Damian Mitsch, ADA Chief Executive Officer, on 02 8815 3333.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Liew', with a long horizontal line extending to the right.

Dr Stephen Liew
President