



## For Consultation: RDT Stamp Standard of Practice

At its May 30, 2019 meeting, the Quality Assurance Committee of CDTO has approved a draft of the Standard of Practice: RDT Stamp for stakeholder consultation.

### Background:

Section 32 of the Regulated Health Professions Act, 1991 prohibits any person to design, construct, repair, or alter a dental prosthetic, restorative, or orthodontic device unless the person is: (a) supervised by a member of either the College of Dental Technologists of Ontario (“CDTO”) or the Royal College of Dental Surgeons of Ontario, or (b) a member of either the CDTO or RCDSO.

The practice of dental technology is in the public domain (meaning non-licensed workers can perform dental technology under supervision). The College issues a stamp to every RDT upon initial registration and requires annual renewal by members who holds a Certificate of Registration in the General Class and is eligible to practice (“General Member”).

The College-issued stamp must be used to authenticate all documents of a professional nature that have been prepared and/ or reviewed by the General Member.

The stamp signifies that the General Member has accepted professional responsibility for the dental technology work represented in the document. This holds true regardless of who has worked on the case, General Members and/ or non-licensed workers. In essence, proper use of the stamp represents the General Member’s commitment to upholding the College’s standards and requirements.

This Standard of Practice sets out the College’s expectations regarding the use of the College-issued stamp, including proper use of the stamp, stamping of documents, professional responsibilities, and records retention.

### FEEDBACK:

The College is committed to being transparent about its decision-making processes for its members and the public and looks forward to receiving your comments and feedback regarding the proposed RDT Stamp Standard of Practice.

**The deadline to submit your comments is June 30, 2019.**

To comment on the proposed changes, please send an email to the College at [info@cdto.ca](mailto:info@cdto.ca) with the subject line “RDT Stamp SOP Consultation Feedback” no later than June 30, 2019.



**College of Dental Technologists of Ontario**  
Ordre des Technologues Dentaires de l'Ontario

## **Standard of Practice: RDT Stamp**

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## Introduction

Section 32 of the Regulated Health Professions Act, 1991 prohibits any person to design, construct, repair, or alter a dental prosthetic, restorative, or orthodontic device unless the person is: (a) supervised by a member of either the College of Dental Technologists of Ontario (“CDTO”) or the Royal College of Dental Surgeons of Ontario, or (b) a member of either the CDTO or RCDSO.

The CDTO is the regulator that administers the *Dental Technology Act, 1991*, the Health Professions Procedural Code and the RHPA, as it relates to the dental technology profession. Under Section 3 (1) 3 of the Code, the CDTO has the authority to develop, establish, and maintain programs and standards of practice to assure the quality of the practice of the profession.

The practice of dental technology is in the public domain (meaning non-licensed workers can perform dental technology under supervision). The College issues a stamp each year to all General Members. The stamp expires after one year and must be replaced annually. The College-issued stamp must be used to authenticate all documents of a professional nature that have been prepared and/ or reviewed by the General Member.

The stamp signifies that the General Member has accepted professional responsibility for the dental technology work represented in the document. This holds true regardless of who has worked on the case, General Members and/ or non-licensed workers. In essence, proper use of the stamp represents the General Member’s commitment to upholding the College’s standards and requirements.

## Scope

This Standard of Practice applies to all members of the College. This Standard relates to the use of the College-issued stamp when authenticating professional documents. The procedures outlined apply equally to documents for external use that accompany design proposals and appliances and copies retained by the laboratory.

## Purpose

This Standard of Practice sets out the College’s expectations regarding the use of the College-issued stamp, including proper use of the stamp, stamping of documents, professional responsibilities, and records retention.

## Definitions

For the purposes of this standard, the following terms and definitions apply:

**Act** – *Dental Technology Act, 1991*

**CDTO or College** – The College of Dental Technologists of Ontario

**Code** – Health Professions Procedural Code, being Schedule 2 to the *Regulated Health Professions Act, 1991*

**General Member** – A Member of CDTO who holds a Certificate of Registration in the General Class and is eligible to practice (e.g. not Inactive or Suspended)

**Professional Document or Document** – A document in any form or medium issued to another person on which that person is permitted to rely, for the intended purpose of that document (e.g. prescriptions, design consultation proposals, invoices, work orders, sub-contracting documents).

**RDT** – Registered Dental Technologist

**Regulations** - The regulations under the *Dental Technology Act, 1991*

**RHPA** – *Regulated Health Professions Act, 1991*

**Standard** – Standard of Practice

**Stamp** – A stamp issued by the College to a General Member. It contains the member's name, registration number, and the seal of the College.

## Professional Responsibilities

A General Member is responsible for practising in accordance with the RHPA, the Act, Regulations, Code of Ethics and the Standards set by College.

A General Member shall only apply their stamp to documents they have prepared, or to documents that were prepared under their supervision, control and/or direction. In the case of documents prepared by someone else, a General Member shall only apply their stamp to the documents after thoroughly reviewing the documents and accepting professional responsibility for them.

A General Member is responsible for maintaining custody and control of their stamp at all times and shall take reasonable precautions to prevent the unauthorized use of their stamp.

A General Member shall apply the stamp personally and cannot delegate the act of stamping.

A member of the College that is ineligible to practice and/or holds Inactive status does not have the authority to affix their stamp on any documents. **A General Member who transfers to the Inactive class of registration or is suspended (administrative or disciplinary/ incapacity) shall return the Stamp to the College when required to do so.**

A General Member who stamps documents accepts full responsibility for that case, even if other RDTs, non-licensed individuals, laboratory assistants, other health care professionals or any combination thereof, have contributed to the finality of the case.

The General Member who stamps the documents authorizing the release of the case certifies that the case has been personally examined for conformity to the prescription and that it accurately reflects the processes, materials, and charges appropriate for the prescription.

It is always up to the professional judgement of the General Member to assess whether they are competent to stamp the documents authorizing the release of the case.

Failure to stamp and authenticate documents or failure to perform a thorough review of the case and accompanying documents is in violation of this standard.

## Stamping and Documents

### Who should stamp

Where a professional document has been prepared by more than one General Member, the document shall be authenticated by only one General Member. It is generally expected that the General Member who is responsible for coordinating the work of the team or who is in a supervisory role (if he or she was sufficiently involved in overseeing the work) would stamp the document.

The decision as to who will authenticate a professional document should be made prior to any work on its preparation.

The following is a list of documents that the College expects General Members to stamp. It is not an exhaustive list, and all General Members should rely on their professional judgement to determine whether or not to affix his or her personal stamp on any other documents.

## What to stamp

- **Design Consultations** –any written design proposal setting out the technical aspects of the dental device
- **Colour Matching (Custom Staining)** – after completing the procedure, the RDT must record the shade that he/she had selected on the prescription, invoice and/or the work order
- **Invoices (original documents issued to client)** – including no charge invoices for interim stages, repairs or alterations
- **Release authorizing document**- any documents, which may include invoices, that authorize the release of the case/dental device.

## What not to stamp

- Documents that are provided to someone only for review/comment, e.g. drafts, and are not final in nature.
- Documents of a business nature that do not pertain to the specifics of the case/prescription e.g. contracts, checklists, cost estimates, drafts, schedules, human resources documents, correspondence, brochures, general information, presentations, conference papers, journal articles. This also includes financial records and business records (but it does not include invoices that authorize the release of the case, which must be stamped).
- Documents that have been completed by other RDTs, other health care professionals, unlicensed individuals, members of the public, or any combination thereof, where the General Member has not had direct control or where the General Member has not personally examined the case.
- Documents and any documentation of work that the General Member determines through his or her sound professional judgement would not meet the standards of practice of the profession.
- Documents and any documentation of work where the General Member determines through his or her sound professional judgement that proper supervision has not taken place.
- Documents and any documentation of work that the General Member in his or her sound professional judgement cannot or should not for any reason stamp.

## Process of Stamping Document

General Members should have a formal process for preparing, stamping, and issuing documents. The process should include the following procedures as a minimum:

- Checking to ensure that all documents are complete for their intended purpose and that the completed case conforms to the prescription and that it accurately reflects the processes, materials, and charges appropriate for the prescription.
- Verifying to ensure the document and completed work meet the requirements of CDTO's standards of practice, guidelines, and Regulations.
- Approval by the General Member who acknowledges that the document and completed work meet the standard of the profession and accepts responsibility for it by stamping the final authorizing document.

The party to whom a professional document is issued is entitled to receive an original stamp on an original document. A copy of the original stamped professional document shall be retained at the General Member's place of business.

## Electronic Stamping

With the advancement of technology, the modern-day laboratory has adapted to new and emerging technologies. For example, laboratories may use CAD CAM, 3D vector modelling, electronic record keeping and computers to generate invoices and other documents.

The duplication, replication, creation and electronic use of the College stamp is not permissible. The College stamp cannot be electronically replicated and affixed to electronic documents as a substitute to a physically applied stamp. The stamp must be physically applied to every invoice and other authorizing documents. It is acceptable to apply the stamp physically and then convert the stamped paper documents into a digital file.

## Records Retention

The CDTO expects General Members to retain patient files for at least 10 years following the release of a case. CDTO expects this to include prescriptions, design consultations, and relevant information related to the case as provided by the referring health care professional. Destruction or transfer of records must be done in a secure and confidential way. This requirement encompasses electronic or paper copies.

A copy of any stamped document must be retained for at least 10 years following the release of the case. All other files related to the practice must also be kept for a period of ten years.



## Legislative Context

### ***Regulated Health Professions Act, 1991***

#### **Prohibitions**

##### ***Dental devices, etc.***

**32** (1) No person shall design, construct, repair or alter a dental prosthetic, restorative or orthodontic device unless,

(a) the technical aspects of the design, construction, repair or alteration are supervised by a member of the College of Dental Technologists of Ontario or the Royal College of Dental Surgeons of Ontario; or

(b) the person is a member of a College mentioned in clause (a).

#### ***Employers***

(2) A person who employs a person to design, construct, repair or alter a dental prosthetic, restorative or orthodontic device shall ensure that subsection (1) is complied with.

#### ***Supervisors***

(3) No person shall supervise the technical aspects of the design, construction, repair or alteration of a dental prosthetic, restorative or orthodontic device unless he or she is a member of the College of Dental Technologists of Ontario or the Royal College of Dental Surgeons of Ontario.

### ***Schedule 2: Health Professions Procedural Code***

#### ***Objects of College***

**3** (1) The College has the following objects:

1. To regulate the practice of the profession and to govern the members in accordance with the health profession Act, this Code and the *Regulated Health Professions Act, 1991* and the regulations and by-laws.
2. To develop, establish and maintain standards of qualification for persons to be issued certificates of registration.

3. To develop, establish and maintain programs and standards of practice to assure the quality of the practice of the profession.
4. To develop, establish and maintain standards of knowledge and skill and programs to promote continuing evaluation, competence and improvement among the members.
  - 4.1 To develop, in collaboration and consultation with other Colleges, standards of knowledge, skill and judgment relating to the performance of controlled acts common among health professions to enhance interprofessional collaboration, while respecting the unique character of individual health professions and their members.
5. To develop, establish and maintain standards of professional ethics for the members.
6. To develop, establish and maintain programs to assist individuals to exercise their rights under this Code and the *Regulated Health Professions Act, 1991*.
7. To administer the health profession Act, this Code and the *Regulated Health Professions Act, 1991* as it relates to the profession and to perform the other duties and exercise the other powers that are imposed or conferred on the College.
8. To promote and enhance relations between the College and its members, other health profession colleges, key stakeholders, and the public.
9. To promote inter-professional collaboration with other health profession colleges.
10. To develop, establish, and maintain standards and programs to promote the ability of members to respond to changes in practice environments, advances in technology and other emerging issues.
11. Any other objects relating to human health care that the Council considers desirable. 1991, c. 18, Sched. 2, s. 3 (1); 2007, c. 10, Sched. M, s. 18; 2009, c. 26, s. 24 (11).

### ***Dental Technology Act, 1991***

#### ***Registration Regulation***

9. (1) It is a non-exemptible registration requirement for an inactive certificate of registration that the member have previously been the holder of a general certificate of registration. O. Reg. 874/93, s. 9 (1).
- (2) It is a condition of an inactive certificate of registration that the member not practice as a dental technologist in Ontario. O. Reg. 874/93, s. 9 (2).