



## For Consultation: RDT Stamp - Proposed Changes

The CDTO Council has approved, for circulation and comment, proposed changes for the issuance of the RDT Stamp to take effect on September 1, 2019.

It is one of the objects of the College to administer the Dental Technology Act, 1991 ('Act'), the Health Professions Procedural Code ('Code'), and the Regulated Health Professions Act, 1991 ('RHPA') 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. In carrying out its objects the College has a duty to serve and protect the public interest.

The proposed changes are being circulated for thirty (30) days to members and stakeholders for comment. Prior to finalizing the proposed changes, Council will consider all comments, keeping in mind the CDTO's mandate to protect the public interest.

### ISSUING THE RDT STAMP

#### Proposed Change

The College is proposing that every RDT who holds a Certificate of Registration in the General Class and is eligible to practise ('General Member') be issued an RDT Stamp ('Stamp'). Currently, the Stamp is only issued by the CDTO to those members who request it. The administrative fee for the Stamp is set out in the CDTO By-laws and will be \$95 in 2019-2020. In the future, the College intends to incorporate the administrative cost of the stamp into the annual registration fees (there will be a further consultation prior to implementing this by-law change).

This change will take effect on August 1, 2019 to coincide with the 2019-2020 annual registration renewal.

#### Reasons for Proposed Change

- 1. To uphold the intent behind the creation and issuance of the Stamp, which is to protect the public from illegal dental technology practice, by ensuring all professional documents are properly stamped by a General Member.***

Section 32 of the RHPA prohibits any person to design, construct, repair, or alter a dental prosthetic, restorative, or orthodontic device unless they are: (a) supervised by a member of either the College of Dental Technologists of Ontario (CDTO) or the Royal College of Dental Surgeons of Ontario (RCDSO), or (b) are a member of either the CDTO or RCDSO.

Because the practice of dental technology is in the public domain (meaning non-licensed workers can perform dental technology under supervision), the College created the Stamp to provide the client (dentists, other authorized practitioners and ultimately the patient) with a means of authenticating all documents of a professional nature that a General



Member has prepared or reviewed, such as invoices and written designs. A General Member's authentication indicates that she or he has accepted professional responsibility for the documents authorizing the release of the case, certifies that the case has been personally examined for conformity to the prescription and that the case was designed, constructed, repaired, or altered in accordance with the standards of the CDTO. This holds true regardless of who has worked on the case, General Members and/ or non-licensed workers.

Based on Member feedback and inquiries and complaints received from dentist's and dental benefit providers, the College believes that the Stamp continues to do the job it was designed to do.

**2. To provide public assurance that the General Member's stamp evidenced on professional documents was applied by that same individual and not by a third party.**

Until now, General Members have delegated use of their Stamp to RDTs and non-RDTs for various reasons, which may pose a risk to the public. The College recognizes that this practice is compounded by the fact that not all General Members have their own Stamp.

A General Member should only apply his or her Stamp to professional documents for cases he or she has prepared or for cases that were prepared under his or her supervision and control. Issuing a Stamp to all General Members will ensure that each General Member has the ability to release cases under their control.

**3. To recognize that all General Members are qualified to practise the profession upon being granted a General Certificate of Registration.**

The current system of providing a Stamp to the "RDT-in-charge" may create a misperception with dentists, employers or the public that General Members who have a Stamp are more highly qualified than other Members because they can release cases. However, the legislation does not restrict a General Member from exercising the full scope of practice of the dental technology profession or from supervising the technical aspects of the design, construction, repair or alteration of a dental prosthetic, restorative or orthodontic device carried out by non-licensed workers.

The Registration Regulation 874/93 prescribes two (2) classes of registration only, General and Inactive and does not contemplate an RDT-in charge status. There are currently no additional competency or experiential requirements to receive a Stamp. The proposed change reflects what is already generally accepted in the profession, namely that a General Member is eligible for a Stamp as soon as they are issued a General Certificate of Registration. Therefore, all General Members should have a Stamp to release a case under their own authority.

Nevertheless, in all cases, a General Member must appreciate the limits of their own competence and must only take on work and release cases for which they are competent.



**4. To reflect the generally accepted standards of the profession that a Stamp must be applied to release a case.**

The CDTO has the authority under section 3(1)3 of the Health Professions Procedural Code to develop, establish, and maintain programs and standards of practice to assure the quality of the practice of the profession. It is a standard of practice of the dental technology profession in Ontario that cases may only be released under the stamp of a General Member. The College will be updating the written standards of the profession to provide further guidance on the appropriate use of the Stamp.

Who does this impact?

- RDTs who currently hold a Certificate of Registration in the General class and do not have a stamp (only 18% of RDTs in this class) will be issued a Stamp under the proposed change.
- RDTs who transfer from the Inactive class to the General class on September 1, 2019 will be issued a Stamp under the proposed change.
- All new Members who are issued a General Certificate of Registration will be issued a Stamp upon registration under the proposed change.

**STANDARD OF PRACTICE**

Proposed Change

The requirements for the issuance, control and application of the Stamp will be set out in a new RDT Stamp standard, and the current Laboratory Supervision standard will be revised accordingly.

The RDT Stamp standard is under development and will be presented to Council at its June 14, 2019 meeting for review.

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**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 change for the RDT Stamp and Standard of Practice.

**The deadline to submit your comments is June 4<sup>th</sup>, 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 Consultation Feedback" no later than June 4<sup>th</sup>, 2019.