COLLEGE OF DENTAL TECHNOLOGISTS OF ONTARIO

Laboratory Supervision Standards

This document contains practice parameters and standards that must be taken into account by all Ontario dental technologists in discharging supervisory responsibilities and/or in the provision of dental technology services in dental laboratories. It is important to note that the College (CDTO) or other bodies shall refer to this document in determining whether appropriate standards and professional responsibilities have been maintained.

INTRODUCTION

The *Regulated Health Professions Act, 1991* states:

> "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 (CDTO) or the Royal College of Dental Surgeons of Ontario (RCDSO); or
>
> (b) the person is a member of the College in clause (a)."
>
> [Exceptions are provided for denturists, public hospitals, and clinics associated with faculties of dentistry or denturism.]

We consider the "technical aspects of design" to be the determination of the shape, contours, and structural elements, the choice of materials, and the choice of process.

The "technical aspect of construction" includes the specification of process details, and of material details. The materials are to be specified having regard to the environment in which the appliance will be used.

The "technical aspects of repair or alteration" involve the same processes of design and construction, though applied to an existing appliance.

We are of the view that "dental prosthetic, restorative or orthodontic device" includes significant custom-made sub-components. Sourcing such components must be from supervised laboratories.

CONCEPT OF SUPERVISION

The concept of "supervision" is:

> "***A member of the College (CDTO) is responsible for all aspects of dental technology practice in the laboratory in which the member practises and which is being supervised by the member at all times. A member is responsible for overseeing the design, construction, repair and alteration of each dental prosthetic, restorative or orthodontic device that is processed in the laboratory under the authority of the member's stamp, whether the member is physically present or not. A member who is supervising must be available within the suite of offices housing the laboratory when prescriptions are being processed, as detailed below. A member shall indicate his/her acceptance of responsibility for supervising by stamping each case in accordance with the standards of the College."***

SUPERVISION REQUIREMENTS

The CDTO Standards of Practice and Laboratory Supervision clearly sets out the College's expectations of its members. The CDTO requires that each invoice or other authorization for release of any dental prosthetic be stamped by the dental technologist (RDT) taking responsibility for the case. Dentists and others recognize the College issued stamp as indicating that every technical aspect of the design of the dental prosthetic, restorative or orthodontic device was personally supervised by the responsible RDT. The College operates a program to ensure that only qualified members who continually meet the supervision requirements will have the privilege of using the College issued RDT stamp. In order to be permitted to participate in the program, members must complete the application form for laboratory supervision, provide information about their planned supervision activities and undertake to meet standards and requirements. The use of the stamp would be required to conform to professional standards set by the College. The stamp includes the member's registered name and his/her registration number with the College. Each document requiring a stamp would also have to be dated.

1. CONTROL OF RDT STAMP

Only an RDT can authorize a laboratory to impress his/her College issued stamp. Each RDT will be responsible for ensuring that his/her stamp is not used by any laboratory without his/her authority, and each RDT will be held **completely responsible** for any case which is released on the authority of his/her stamp, unless it can be demonstrated that the laboratory used the stamp when the RDT was not employed or otherwise associated with the laboratory, **and** after the RDT had made all reasonable efforts to obtain the stamp from the laboratory and deprive the laboratory of the right or ability to use the stamp. ***If a member's stamp has been lost or stolen or should there be unauthorized use of a member's stamp, the member must notify the College in writing within 72 hours.***

2. WHAT MUST BE STAMPED?

Both the client and laboratory copy of the invoice or other document authorizing the release of the case must be stamped by the supervising RDT or dentist. According to the RCDSO, the supervising dentist should either sign or imprint his Ontario Dental Association (ODA) stamp. (Ref. "Dispatch", Jan/Feb 2003, p.24 and 43.) It is a standard of practice that

no case be released, other than on an interim basis, without a stamp. Every invoice must be stamped, including "no charge" invoices for interim stages or repairs or alterations. This control is intended to back up the requirement in the records and conflicts provisions of the regulations.

Stamping the invoice indicates that the RDT-in-charge of the laboratory in question has examined all records supplied by the prescribing dentist and any other records necessary to the design, fabrication or repair or alteration in question. These include impressions, intra-oral records, models, diagrams, written instructions, and verbal instructions, which must be recorded in the chart. The stamp indicates that the RDT accepts responsibility for certifying that the records reviewed are adequate to design, construct, repair or alter the case.

By stamping the invoice or any other document authorizing the release of the case, the RDT certifies that he/she has examined the case for conformity to the prescription. The stamp also certifies that the case was designed, constructed, repaired, or altered in accordance with the standards of the CDTO, and that the invoice conforms with the standards of the College in that it accurately reflects the processes, materials and charges.

2.1 Design Consultations

Prior to release of any written design proposal setting out the technical aspects of the dental device in question, it **must be stamped and initialled**. This will ensure that the thought process which is the essence of the professional knowledge, skill and judgement of the RDT cannot be circumvented, with non-RDT plans being conveyed to the dentist and then back to the laboratory and prescription. Please note that there are no exceptions to the rule that an RDT must also initial a written design proposal. ***No design consultation proposal can ever be released without an RDT's direct approval.***

2.2 Colour Matching (Custom Staining)

It is a standard of practice that colour matching (custom staining) requires the presence of an RDT. An RDT may remove, subject to the CDTO Standards of Practice, a "removable" temporary appliance to do intra-oral colour matching, provided that no cement seal may be broken. After completing the procedure, the RDT must record the shade that he/she had selected on the prescription, invoice and/or work order which **must be stamped and initialled**.

3. ACTIVITIES NOT REQUIRING RDT APPROVAL

3.1 Release of any case at a stage where it is notable to be used for its intended purpose. Such cases shall not include try-ins. This will permit wax mock-ups, ***but would not permit any appliance to be released without a stamp if it could conceivably be retained for use by the patient***, regardless of whether the RDT believes he/she will be required to do further work at the time of release.

3.2 Disinfection of cases

4. THE REQUIREMENT THAT AN RDT MUST BE PRESENT

The CDTO expects an RDT to be fully responsible and accountable at all times for the technical aspects of dental technology practice, as well as for the administration of the laboratory. ***The personal involvement of an RDT is required in every case.*** While the College recognizes the practical need for RDTs to take short absences from their laboratories, it expects the dental technologists to put in place adequate measures to ensure that the public is protected prior to taking any time off and to personally review each item before it goes out.

4.1 Short-term absences for such matters as lunch, banking, off-site consultations, CDTO and association affairs are to be permitted, provided that they do not exceed 30% of the operating hours of the laboratory in any given week. The RDT will authorize the release of cases by stamping the invoices and release authorization of every case, and perform other supervisory responsibilities during the remainder of the operating hours of the laboratory when he/she is present. These permitted absences cannot be carried forward or be cumulated for later use.

4.2 To ensure that each laboratory is supervised regularly and consistently, an RDT has to be present during its operating hours. A laboratory **cannot** be said to be supervised if there is no RDT or DDS present for:

- More than two calendar weeks in each of the *three four-month* periods in which the laboratory is operating in any calendar year and which absence cannot exceed 30 days in total; or
- More than two calendar weeks in any six-week period.

4.3 Any absence of greater than those permitted above will require a replacement RDT who has successfully obtained Laboratory Supervision Status from the College and been issued their own RDT stamp.

4.4 As well, the College will consider giving relief in individual cases of hardship arising from illness or bereavement, or participation in the work of Ontario dental technology professional bodies at the board or committee level, provided that there are alternative mechanisms that ensure public protection. The College may refuse to approve absences beyond those set out above if the public safety may be jeopardized, or if the laboratory would repeatedly be left unsupervised or inadequately supervised. The College will, at its option, require members seeking such relief to provide details of the alternative mechanisms in place at the laboratory the RDT supervises to assure the public is protected and that there is personal RDT involvement in every case.

4.5 Despite absences set out above, an RDT has to be personally responsible for every colour matching, case, invoice and authorization of releases under his/her stamp. Design consultations, which in all instances, requires the participation of an RDT must be stamped and initialled.

4.6 Each RDT will be required to keep a record of the days worked or assigned to a given laboratory and to produce it to the College on request. ***An RDT may only supervise a single laboratory on a given day. No RDT shall permit a laboratory to use his or her stamp on a day which is not assigned to that laboratory. For the purpose of supervision, a laboratory is a physical as well as a corporate entity in which the design, construction, repair and alteration of dental devices takes place in a single building within a single area, all of the parts of which are contiguous and directly accessible one from the other, and which operates and issues invoices under a single name.***

5. GENERAL SUPERVISORY RESPONSIBILITIES OF A "SUPERVISING RDT"

We consider that the supervising RDT or DDS should be responsible and accountable for the administration and management of the laboratory, for setting guidelines through policy and procedure manuals, for inspection and quality control, and for directing both regulated and unregulated staff.

The supervising RDT or DDS must:

5.1 be personally involved in the hiring of all technical employees who will work under his/her supervision in the design, construction, repair or alteration of dental devices, and must, at a minimum, interview and evaluate the candidate, and approve his/her hiring;

5.2 periodically evaluate staff under supervision, at least, annually, and more frequently if necessary;

5.3 ensure that records are kept in accordance with College standards, including the periodic confirmation that they are being appropriately compiled and stored;

5.4 take responsibility for compliance with the financial record keeping requirements of the College;

5.5 be responsible for the adequacy of materials used in the fabrication of dental appliances, and shall be responsible for the nature, adequacy, maintenance and calibration of all equipment used in the fabrication of dental appliances and shall warrant that each meets College standards;

5.6 set guidelines as to how each order will be filled and what standards must be met;

5.7 establish and update written procedure manuals dealing with materials, processes, equipment and infection control. Initial manuals must be available no later than September 1, 1997;

5.8 ensure that those under his/her supervision are familiar with the manuals and follow the procedures and meet the standards set out therein;

5.9 establish a written procedure for orders which do not fall within the standard policy and procedure manuals;

5.10 be responsible for periodic test sampling of materials, inspection of equipment, and review of procedures and their application to ensure continued conformity to quality standards;

5.11 establish and update written equipment maintenance guidelines for quality control and safety, with the initial manual available no later than September 1, 1997. These manuals may rely on manufacturer's guidelines, where they do not conflict with any College standard or policy;

5.12 be responsible for the general training and development of employees to ensure familiarity with the manuals, including revisions to the manuals to reflect new standards, equipment or materials in respect of any area to which the employees in question is assigned tasks in the laboratory.

The CDTO is of the view that to carry out this level of supervision, with the RDT's personal involvement in every case and in the general oversight aspects, would require a significant commitment of time actually spent in the laboratory. ***Members should be aware that the College will require members to meet both the quantitative and the qualitative standards.***

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