



7800 14th Ave, Suite 210 Markham, ON L3R 0E
T 416-491-3186 TF: 1-877-226-0800 F: 416-491-1670
E: cao@associationconcepts.ca

cao-aco.org



Sept 13, 2018

Dear Bernie White,

I am writing to bring to your attention my concerns regarding Direct-to-Consumer orthodontic care. These orthodontic systems present a significant risk to the consumer.

At this time, Direct-to-Consumer orthodontic care is not available in Canada, but there are multiple companies providing these services in the United States. Currently, one has begun advertising on various employment sites for their storefront locations across the country.

The model that all of these companies follow is to provide orthodontic diagnosis and treatment directly to the consumer without an examination by a dentist and with incomplete dental records. Further, the treatment progresses without direct supervision by a dentist. The consumer submits photographs and impressions that they take on themselves or they are seen in a "store front" location for an intra-oral scan. The companies claim that the treatment plan is approved by a licensed dental "consultant" that remotely reviews the photographs and impressions / scans.

These companies are a potential harm to patients across Canada, as they reduce their health care to that of any other consumer product. This treatment does not meet the standard of care mandated by our provincial regulations, and it may constitute the illegal practice of dentistry as no dentist is providing diagnosis or supervision. Furthermore, there is no assessment by a dentist of the individual's dental health prior to treatment being rendered. Finally, legal consent for treatment is not being obtained as informed consent can only be obtained by the treating doctor, of which there is none.

Although I am not aware of the presence of any of these companies locally, I am asking you to help protect the health of people in Saskatchewan by taking action to create policy regarding Direct-to-Consumer companies.

Sincerely,

Kamrin Olfert, DMD, MS