

Dr. Louie Kriel, President
College of Dental Surgeons of Saskatchewan
201 1st Ave S
1202 The Tower at Midtown
Saskatoon, SK S7K 1J5

October 24, 2018

Dear Dr. Kriel,

For almost the past two years, the Canadian Association of Orthodontists (CAO) has attempted to contact individual Registrars across Canada with respect to the inevitable attempt by Direct-to-Consumer (DTC) Orthodontic treatment, providing aligners to Canadian patients. The CAO has become aware of the recent attempts of DTC companies to recruit dentists in different jurisdictions across Canada to act on behalf of these companies. These DTC's have been active in the United States for a number of years and their model includes either having patients self-impress their occlusion or having scans taken at storefront scan centres. The patient is then diagnosed without medical or dental histories, without an in-person exam and a treatment plan is then approved by a dentist (remotely for a fee) in the jurisdiction in which the patient lives. Approved consent is not received as the patient is not given alternatives to the treatment plan and aligners are then produced and sent to the patient by mail. The progress of treatment is not followed by the treating dentist and there is no documentation in the form of treatment records.

Unfortunately, the DRA's have stated that they cannot act without a complaint. We have been neglectful in not bringing this to the elected officials in each province but are appealing to you now, rather than relying solely on communicating with the registrars. As I understand the governance in Saskatchewan, dispensing and fitting a dental appliance are restricted activities, and only health professionals meeting the requirements are able to perform those health services. The dentists approve the treatment plans without seeing the patient for an exam, without proper histories or collection of supervised diagnostic records, without proper insertion of appliances, without proper follow-up or record taking; thus, they are not performing to the standard of care as dictated by the HPA. Is it not the responsibility of the CDSBC to ensure that the dentists are complying with all regulatory requirements and is there no way that the College can be proactive and warn members that providing a service that contradicts the HPA will be subject to licensure review and possible disciplinary action? Do we really need to wait for harm to occur to our patients and receive a complaint before we provide a warning to the dentists of Saskatchewan?

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I hope you understand that this is not an orthodontic issue, but rather is a patient care issue. There are examples of significant harm occurring to patients in the United States. The DTC companies that provide the care require that the patients sign a nondisclosure agreement prior to receiving the aligners and are very active in ensuring that the patients do not expose the majority of harm that has occurred.

I would hope that the elected officials of the Dental Colleges across Canada can convince the regulators that we can be proactive and that we can prevent harm from occurring to the patients for whom we are responsible.

I look forward to a reply to discuss this situation further. I can be contacted through the CAO office at cao@associationconcepts.ca.

Sincerely,



Dr. Jay Philippon, President
Canadian Association of Orthodontists

cc. all Provincial College Presidents and Elected Officials
Dr. Brian Phee, Saskatchewan Director on CAO Board