



November 7, 2022

Attention: All Canadian Provincial/Territorial Dental Regulatory Authorities

Dear Colleagues,

It has recently come to the attention of the Canadian Academy of Oral and Maxillofacial Radiology (CAOMR) that unlicensed dentists are providing radiographic reporting services in Canada. This presents a serious compromise to public safety and is in direct violation of the professional standards set forth by the Canadian Dental Regulatory Authorities (DRAs).

A representative example of a radiographic report is attached to this correspondence. This report on a cone beam CT volume is provided on behalf of BeamReaders by Dr. Francisco Eraso, an Oral and Maxillofacial Radiologist and Orthodontist based out of Indianapolis, Indiana, USA. Based on the publicly available BeamReaders biography for Dr. Eraso, there is no indication that this individual holds valid Canadian credentialing and licensure (<https://www.beamreaders.com/experts/dr-francisco-eraso>). The cone beam CT report was ordered for a Calgary patient (name redacted from report) by a Calgary dentist, Dr. David MacLean.

The example cited above involves an American-trained and licensed oral and maxillofacial radiologist; simply put, this individual does not hold the appropriate licensure to provide dental services in Canada. The broader implications of this issue are obvious. There are currently no measures in place by the Canadian DRAs to prevent the provision of radiographic reporting services by unlicensed individuals; there is nothing that prohibits a dental practitioner without Canadian licensure, or technically even a lay person, from establishing an online radiographic reporting service that Canadian dentists could access. This poses an obvious risk to public safety. It also renders the training and licensure of Canadian-accredited oral and maxillofacial radiologists meaningless – if virtually anyone is allowed to provide radiographic reporting services on dental imaging acquired in Canada, the value of our training and our specialty as a whole is rendered worthless.

The CAOMR respectfully calls upon the provincial/territorial DRAs to collectively take immediate action to curb this unaccredited practice. The following addition (or similar) to all Canadian DRA Standards of Practice is recommended:

“To provide radiographic reporting services for dental imaging acquired in Canada, a dentist must:

1) Meet the required educational and training qualifications before being registered with the provincial/territorial Dental Regulatory Authority in their province/territory of primary residence;

2) Be registered and in good standing with the Dental Regulatory Authority in their province/territory of primary residence; and

3) Carry the appropriate malpractice insurance coverage mandated by the Dental Regulatory Authority in their province/territory of primary residence.”

The wording is intentionally left open to be applicable to any dentist in Canada and is not intended to be exclusively applied to oral and maxillofacial radiologists. The virtue of a national licensure examination in Canada for both general dentists and dental specialists should facilitate the ability for dentists to provide teleradiology services across the country, regardless of the province/territory in which imaging was acquired. This ultimately improves access to care for patients and ensures that every radiographic report is completed by a licensed dentist in Canada.

The CAOMR looks forward to working with the Canadian DRAs to achieve an expedient resolution on this matter.

Respectfully submitted,



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Enclosure: Sample of radiographic report from non-accredited source