

23 February 2023

Medical Board of Australia  
Australian Health Practitioner Regulation Agency  
51/680 George St  
Sydney NSW 2000

By email: [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

**Re: Consultation: revised telehealth guidelines**

Good morning,

Thank you for inviting comment on the Medical Board of Australia's (Medical Board) public consultation - *draft revised guidelines: telehealth consultations with patients*, dated 14 December 2022 (guidelines).

For this response the Australian Dental Association (ADA) and the Australian Society of Orthodontists (ASO) have coordinated a single response from both organisations.

**About us**

The ADA is the peak representative body for dentists in Australia and an active member of the World Dental Federation. Our 17,000 members operate more than 7,500 small businesses across Australia and include dentists who work across both the public and private sectors, across 14 specialty areas of practice, in education and research roles, and dentistry students currently completing their entry-to-practice qualification.

The ASO helps patients understand their options for orthodontic treatment and provides information about dealing with the most qualified practitioners providing orthodontic care. The ASO represents over 90% of registered orthodontic specialists and advocates for the benefit of the orthodontic profession in Australia.

**Context**

We recognise that the guidelines are intended to inform medical practitioners but consider it worthwhile to offer feedback from our experiences in the dental sector, which might help inform their development.

We understand the Medical Board is unlikely to refer to dentistry in a revised version of the guidelines because it doesn't regulate that sector. However, we encourage the Medical Board to consider sharing its experience developing the guidelines with the Dental Board of Australia (Dental Board) in case this assists the Dental Board in considering the merits of developing an equivalent guideline for dental professions.

In most cases dental treatment is best provided in a fully equipped dental surgery. However, teledentistry has potential to be beneficial for rural and remote patients, and in other special circumstances where technology supports it, such as aged care.

We consider it important that any teledentistry services are provided by a dental practitioner who is registered with the Dental Board.

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## Remote consultations and devices – dentistry experience

In recent years, several companies began advertising and supplying direct-to-consumer (DTC) orthodontic appliances in Australia – which involve little or no direct interaction with a dentist or orthodontist. Our concern with these devices includes their potential to damage a patient’s teeth or gums.

Under the DTC model, a patient generally does not have a clinical examination with a registered dental professional – but submits photographs and/or dental impressions – taken, often by themselves. In some cases, a 3D scan of their teeth is taken at a shopfront by a person who may not be registered.

The premise of the model rests on an assessment of the patient’s records without a face-to-face examination by a dentist or orthodontist. The practitioner is sometimes based overseas, in which case they would not be registered with AHPRA.

The patient receives their orthodontic aligners based upon a treatment plan of sequential plastic aligners created by a practitioner who has no intention of ever having a face-to-face examination. Further third-party dental professionals may be engaged to ‘oversee’ care but are unlikely to be the primary practitioner responsible for creating the treatment plan.

There is no direct responsibility or accountability for the treatment that the patient has sought. If treatment does not go to plan, the patient may seek refunds, which are often subject to non-disclosure agreements; and still require orthodontic treatment at their own cost.

This is inconsistent with contemporary Australian dental or orthodontic assessment and treatment. Dental or orthodontic treatment is complex and requires thorough assessment and supervision. A qualified and registered dental professional must assess a patient’s oral health, dental or orthodontic needs fully, prior to developing a treatment plan. They may need to see a patient regularly throughout treatment to ensure teeth movement occurs safely, and to review tooth positions at the conclusion of treatment.

## Recommendations

### Recommendation 1

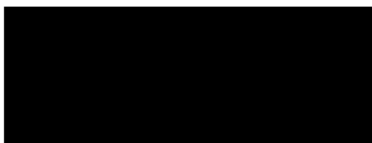
The Medical Board consider sharing its experience developing the guidelines with the Dental Board in case this assists the Dental Board in considering the merits of developing an equivalent guideline for dental professions.

### Recommendation 2

The Medical Board consider including reference in the guidelines to prescribing medical devices without having seen a patient in person.

We would be most happy to discuss the comments provided. Should you have any questions, please contact Mr Damian Mitsch, ADA Chief Executive Officer at [REDACTED], or Ms Kerstin Baas ASO Chief Executive Officer at [REDACTED].

Yours sincerely,



Dr Stephen Liew  
President, Australian Dental Association



Dr Andrew Toms  
President, Australian Society of Orthodontists