



*Summary Report on*  
**Practice Models and  
Corporate Dentistry**

November 2025

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# Background

## Dental Practice Model Context

Dentists work in various types of practice models including:

- **private practices:** owned and operated by a single dentist (solo private dental practice) or multiple dentists (group private dental practice);
- **corporate dental practices:** owned, aligned, or partnered with a corporation (also known as a dental service organization or 'DSO') that generally provides centralized support for the business and operational elements of the dental practices;
- **other types of clinical and non-clinical settings:** such as hospitals, community health centres, educational institutions, and governments.

In recent years, models for dental practice ownership and operation have become more diverse, including a notable shift towards various corporate ownership models<sup>1</sup> and the emergence of direct-to-consumer dentistry.<sup>2</sup>

Corporate ownership models and direct-to-consumer dentistry may improve access to care and expand patient choice. At the same time, these models raise important questions about how the business objectives of practice owners (particularly non-dentist practice owners) align with dentists' ethical and legal obligations, and dental regulators' role in protecting the public interest.

The Royal College of Dental Surgeons of Ontario (RCDSO) recognizes that each dental practice model offers a unique set of opportunities and issues for patients. For this reason, the RCDSO has taken a **practice model-agnostic approach** to this emerging issue. This approach ensures that the College's work remains focused on addressing specific issues or harnessing specific opportunities for patients rather than endorsing or being biased against any particular practice model.



<sup>1</sup> Group Dentistry Now. (2020, May 27). *Largest Majority Canadian-Owned Network Of Dental Practices Poised For More National Expansion*. <https://www.groupdentistrynow.com/dso-group-blog/largest-majority-canadian-owned-network-of-dental-practices-poised-for-more-national-expansion/>

<sup>2</sup> 'Direct-to-consumer dentistry' is a dental practice model that involves treatments which are largely self-administered with limited supervision from a dentist such as at-home whitening kits, mouthguards or aligners (to straighten teeth) made using a home impression kit.



## Regulatory Context

As of 2024, Ontario had the largest number of registered dentists (over 11,000)<sup>3</sup> and the largest number of dental clinics (over 7,000)<sup>4</sup> of all Canadian provinces and territories.

As the regulator for dentists in Ontario, the Royal College of Dental Surgeons of Ontario (RCDSO) ensures the public has safe, equitable, and competent oral health care by providing leadership to the dental profession in regulation.

The mandate and objectives of the RCDSO are set out in the Ontario *Regulated Health Professions Act, 1991*. Objectives include, but are not limited to, the responsibility to develop, establish and maintain standards and programs to assure the quality of the practice of the profession;<sup>5</sup> and promote the ability of registrants to respond to changes in practice environments, advances in technology, and other emerging issues,<sup>6</sup> such as those related to dental practice models. In achieving all its objectives, the RCDSO has a duty to serve and protect the public interest.<sup>7</sup>

As changes in dental practice models impact quality of care, an exploration of dental practice models and regulatory decision making on this topic fall within the scope of the RCDSO's mandate.

<sup>3</sup> Royal College of Dental Surgeons of Ontario (2025). *2024 Annual Report*. [https://issuu.com/rcdso/docs/2024\\_rcdso\\_annual\\_report\\_?fr=sOGVhODg3OTUwNzc](https://issuu.com/rcdso/docs/2024_rcdso_annual_report_?fr=sOGVhODg3OTUwNzc)

<sup>4</sup> Innovation, Science and Economic Development Canada. (2025, August 18). *Businesses - Canadian Industry Statistics: Offices of dentists*. <https://isd-isde.canada.ca/app/ixb/cis/businesses-entreprises/6212>

<sup>5</sup> Pursuant to s.3(1)3 of the Health Professions Procedural Code (Schedule 2 to the *Regulated Health Professions Act, 1991*, S.O. 1991, c. 18).

<sup>6</sup> Pursuant to s.3(1)10 of the Health Professions Procedural Code (Schedule 2 to the *Regulated Health Professions Act, 1991*, S.O. 1991, c. 18).

<sup>7</sup> Pursuant to s.3(2) of the Health Professions Procedural Code (Schedule 2 to the *Regulated Health Professions Act, 1991*, S.O. 1991, c. 18).

# Practice models & corporate dentistry

## Strategic Project

### Purpose & Objectives

Practice Models and Corporate Dentistry was established as a Strategic Project under the Emerging Issues pillar of the [RCDSO's 2023-25 Strategic Plan](#).

#### The purpose of this project has been:

- to advance the RCDSO's understanding of dental practice models and their implications for patient care; and
- to enable the effective regulation of dentists in all practice models, including corporate dentistry.

#### To achieve the project's purpose, three objectives were set out:



**1** To better understand the types of dental practice models operating in Ontario



**2** To identify issues and opportunities related to various dental practice models, including corporate dentistry, for patients



**3** To develop options to promote and assure quality of care and ensure the effective regulation of dentists regardless of their practice model type

**Table 1** presents an overview of the project's scope of work.

# Options Development

Throughout 2024 and 2025, the RCDSO developed and refined options it could pursue to help assure quality of care across dental practice models. The options were developed using a **risk-based, evidence-informed approach** supported by research and analysis consistent with the project's objectives including:

- academic literature and media review;
- review of regulatory approaches used by various domestic and international regulatory authorities in both health and non-health sectors;
- analysis of relevant RCDSO data (for example, complaints data and responses to the Annual Renewal Questionnaire); and
- analysis of survey-based consultation feedback from registrants, the public, and other interested parties.<sup>8</sup>



There are five options outlined in this summary report. The options include a combination of **traditional regulatory tools** (for example, Standards of Practice, educational resources) and **anticipatory approaches to regulation** to address known and unknown risks.



An **anticipatory approach to regulation** involves using processes that build knowledge and capacity in key areas so that regulatory authorities can better anticipate issues and opportunities, and identify potential regulatory solutions.<sup>9</sup> Examples of anticipatory approaches include regulatory sandboxes and engagement with experts and interested parties.

<sup>8</sup> See Appendix B to Appendix I linked in Table 1 for abbreviated summaries of all research and analysis.

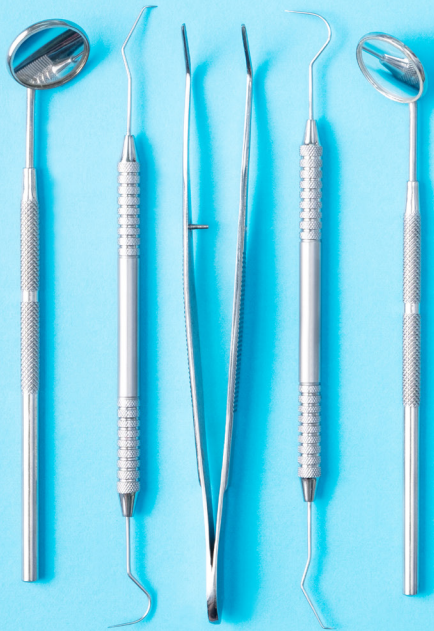
<sup>9</sup> Armstrong, H. and Rae, J. (2017, November). *A working model for anticipatory regulation: A working paper*. Nesta. [https://media.nesta.org.uk/documents/working\\_model\\_for\\_anticipatory\\_regulation\\_0.pdf](https://media.nesta.org.uk/documents/working_model_for_anticipatory_regulation_0.pdf)

# Approved Options for Implementation

## *A comprehensive approach*

On September 18, 2025, RCDSO Council voted to move forward with the five options outlined in the *Report on Practice Models and Corporate Dentistry*.

Together, these options form a comprehensive and strategic framework to support high-quality care and ensure the effective regulation of dentists, regardless of dentists' practice model.



Moving forward, RCDSO staff will develop a **Practice Models and Corporate Dentistry Implementation Plan** to guide the incremental implementation of this work through a responsible and resource-wise approach. As work proceeds, Council will be updated and its direction will be sought at different stages.

The approved options, including their components, are summarized below. [Figure 1](#) presents an overview of the regulatory tools associated with each option and key considerations for their implementation.<sup>10</sup>

<sup>10</sup> A sixth option is captured in Figure 1. This option is not described in the Options Summary as it was not shared with Council for its approval.

# Options Summary

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## Option 1

RCDSO to update and develop new requirements and recommendations for registrants to address unique issues for patients related to the business of dentistry. This option includes two components:

- a. Updating existing resources and developing new guidance (e.g., a Standard of Practice) for registrants that clarify and address unique issues for patients related to the business of dentistry.
  - b. Gathering information to support a longer-term legislative/regulatory review that would aim to explore potential amendments to the Professional Misconduct Regulation under the *Dentistry Act, 1991*, and potential options for new legislation that would help to assure quality of care in an evolving dental practice landscape.
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## Option 2

RCDSO to develop new requirements to ensure a registrant holds primary responsibility for each dental clinic, and that registrants' responsibilities for continuity of patient care are clear regardless of the practice model. This option includes two components:

- a. Developing new guidance (e.g., a Standard of Practice) for a 'lead' registrant in each clinic who has primary responsibility for the oversight and supervision of the clinic (i.e., for compliance with relevant legislation, regulation, and Standards related to practice management), and responsibility for providing current practice information to the RCDSO (e.g., contact information for the lead registrant, whether the practice is affiliated with a third-party).
  - b. Developing new guidance to ensure continuity of care (e.g., the coordination of patient care between dentists where the patient is under the care of a practice and does not have an individual dentist who is primarily responsible for their care).
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## Option 3

RCDSO to enhance educational offerings for RCDSO registrants and Ontario dental students that will help reinforce and illustrate their ethical and professional responsibilities regardless of the practice model. This option includes three components:

- a. Developing new resources (e.g., an RCDSO Connect session or Ontario Dental Association New Dentist Symposium session) focused on upholding ethical and professional responsibilities across various practice models.
- b. Engaging with dental faculties and students in Ontario to implement strategies (e.g., course materials, presentations) that reinforce dentists' responsibility to protect the public interest regardless of their practice model.
- c. Developing new scenarios for the RCDSO's Jurisprudence and Ethics Course and new resources and questions for the RCDSO's Practice Enhancement Tool concerning ethical and professional responsibilities and proliferating and emerging practice models – i.e., corporate dentistry, direct-to-consumer dentistry.

# Options Summary

## Option 4

RCDSO to develop a proposal for an 'Innovation Advisory Service' pilot program. This option includes one component – the development of a proposal for a new program which would be presented to Council for its approval. The proposal would:

- Set out parameters for a pilot program that supports innovators who would like to implement an innovative idea or dental practice model that could improve the quality or delivery of care for patients.
- The pilot program would allow innovators to seek non-binding guidance from the RCDSO regarding how their concept aligns with the existing regulatory framework for Ontario dentists. This could:
  - support innovators in meeting current legislative and RCDSO requirements;
  - safeguard the public interest by enabling more proactive risk-management of innovation in dentistry.

If the proposal is approved by Council, the pilot program would run for a defined period (e.g., 12-18 months), after which it would be evaluated to determine whether its objectives were met. Based on the results of the evaluation, the program could be extended, shutdown, or otherwise changed.

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## Option 5

RCDSO to develop resources to support patients' decision making and registrants' professional judgement related to dental practices and practice models. This option includes two components:

- a. Developing new resources and/or sharing pre-existing resources to help patients determine if the care provided by a particular dental practice is right for them (e.g., "Five questions to ask your dentist about their practice").
- b. Developing a resource that provides general guidance to support the professional judgement of registrants who are considering providing treatment through a direct-to-consumer practice model.

## Conclusion

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As the dental practice landscape in Ontario continues to change, so may its **impacts** on patient **care**.

The options presented in this Summary Report provide the RCDSO with an opportunity to leverage Standards of Practice, resources, education, and information gathering activities to help address known issues and opportunities, and aid in the mitigation of unknown or future issues related to dental practice models.



## Contact Information

Please direct any questions about this report to: [info@rcdso.org](mailto:info@rcdso.org)



# Supporting Table and Figure

**Table 1. Scope of Work: Project Phases**

This table outlines the scope of research and analysis that informed the development of options presented in the Report and Summary Report. Abbreviated summaries of this work are available in the appendices linked within the table.

Phase and Status	Phase Summary	Appendices
<p><b>Phase 1: Information Gathering</b></p>	<p>This phase involved gathering information through desktop research (e.g., jurisdictional and literature review) and consultation activities (including a consultation survey, and conversations with staff at the RCDSO and other regulatory colleges), to better understand:</p> <ul style="list-style-type: none"> <li>→ the RCDSO’s approach to its work, including expectations/guidance related to practice models;</li> <li>→ the types of practice models that exist in Ontario;</li> <li>→ how practice models are regulated in other jurisdictions;</li> <li>→ issues and opportunities related to practice models for patients.</li> </ul>	<p><b><u>Appendix B:</u></b> RCDSO Research Summary</p> <p><b><u>Appendix C:</u></b> List of Practice Models</p> <p><b><u>Appendix D:</u></b> Jurisdictional Review Summary</p> <p><b><u>Appendix E:</u></b> Literature Review Summary</p> <p><b><u>Appendix F:</u></b> Consultation Summary</p>
<p><b>Phase 2: Analysis and Options Development</b></p>	<p>This phase involved reviewing previously gathered information, conducting additional research as needed, and analyzing RCDSO data (e.g., complaints, responses to the Annual Renewal Questionnaire) to develop options to address issues and harness opportunities that practice models, including corporate dentistry, present for patients.</p>	<p><b><u>Appendix G:</u></b> Data Analysis Summary</p> <p><b><u>Appendix H:</u></b> Issues Summary</p> <p><b><u>Appendix I:</u></b> Opportunities Summary</p>
<p><b>Phase 3: Decision-Making and Implementation</b></p>	<p>This phase involved seeking Council’s feedback and approval to implement the options and establish an Implementation Plan to guide timelines and next steps.</p>	<p><b><u>Appendix A:</u></b> Report on Practice Models and Corporate Dentistry and the <b><u>Briefing Note</u></b> to Council.</p>

## Figure 1: Summary of Options and Implementation Considerations

This figure presents an overview of the regulatory tools associated with each option and key considerations for their implementation.

### Royal College of Dental Surgeons of Ontario:



Acts in the public interest by putting patients first.



Ensures the public has safe, equitable, and competent oral health care by providing leadership to the dental profession in regulation.

#### Practice Models & Corporate Dentistry Options

**Option 1 (a):** Requirements and recommendations related to the business of dentistry

**Option 2 (a&b):** Requirements to ensure registrants hold primary responsibility for dental practices and patients' continuity of care

**Option 5 (a&b):** Resources to support professional judgement and decision-making



#### Option 3 (a,b,&c):

Enhanced educational offerings for RCDSO registrants and dental students in Ontario



**Option 1 (b):** Gather information to support a longer-term legislative review

**Option 4:** Develop a proposal for an 'Innovation Advisory Service' pilot program to provide guidance and risk-manage innovative ideas and practices models

**Option 6 (a&b):** Continue to engage with interested parties and explore opportunities to gather information related to dental practice models<sup>11</sup>



#### Regulatory Tools<sup>12</sup>

#### Standards of Practice and Resources

Standards of Practice set out legal, professional, and ethical obligations that apply to dentists practising in Ontario.

Resources (e.g., Newsletter articles) do not set out new professional requirements but highlight or elaborate on existing responsibilities that may be relevant to a specific issue or area of practice.



#### Education

Continuing and updated dental education ensures dentists continuously learn and stay abreast of their field to provide patients the highest quality of oral care.



#### Information Gathering and Oversight

New ways to gather information could support evidence-based decision making by the RCDSO in the longer-term.

Oversight mechanisms could protect the public by enabling the RCDSO to monitor new innovations in the practice of dentistry and improving the accountability of dentists for compliance with legislative and RCDSO requirements.



#### Implementation Considerations

Moderate time and **some** new administrative costs

- 1.5 to 2 years for Standards
- A few months for Resources

Least time and **no** new administrative costs

- A few months to 1 year

Longest time and **some** new administrative costs

- Multiple years for improved legislative review, pilot program information gathering

**Most prescriptive**  
**Greatest regulatory certainty**  
**Helps address known risks**

**Least prescriptive**  
**Least regulatory certainty**  
**Aids in mitigation of unknown or future risks**

<sup>11</sup> Option 6 concerns ongoing engagement with external parties and exploration of opportunities to gather information to support improved understanding and oversight of dental practice models. Though Council was generally supportive of this option, it was not shared with Council for approval as it is operational and related to internal College processes.

<sup>12</sup> The regulatory tools in this figure are only those that are incorporated into the options discussed in this report. These tools do not represent the full suite of regulatory tools available to the RCDSO to carry out its mandate.



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