



December 9, 2009

Mr. Brian O’Riordan
Health Professions Regulatory Advisory Council
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Dear Mr. O’Riordan:

The College of Opticians of Ontario (COO) appreciates the opportunity to respond to the submissions posted on HPRAC’s website regarding the eye care review. We are pleased to note that it appears the majority of stakeholders support interprofessional collaboration and recognize the Optometry Conflict of Interest Regulation to be a key issue. After a review of the submissions, we would like to make a few points:

1. Regarding the College of Opticians, the Ontario Association of Optometrists (OAO) states in their submission:
 - *Over the past 10 years, the College of Opticians of Ontario has demonstrated a lack of deference to its mandate of public protection and has failed to discipline opticians who operate in contravention of the Opticianry Act, despite several complaints and appeals to HPARB by OAO. The College purposely overlooked multiple violations of scope of practice that placed the eye health and vision of the public at risk leading to the proliferation of an unregulated optical chain.*

The College of Opticians respectfully points out that this statement is false. The COO’s mandate of public protection is clear, and moreover, our statistics which are published, show this clearly. We would be happy to provide the Association of Optometrists with data to help them better understand this issue. We would further point out that the majority of complaints the COO has received regarding refraction are from the Ontario Association of Optometrists, not the public, and the appeals process conducted by HPARB has more often confirmed the COO’s decisions than not.



On the matter of refraction, the OAO states:

- *Further, in September 2007 the College of Opticians unilaterally published standards of practice for refraction without formal collaboration with, other optometric or medical groups, and in contradiction of the Opticianry Act.*

Once again, we respectfully submit that this statement is false. The COO conducted a full stakeholder consultation in which the OAO participated (please see the attached response from 2007). In order to assist further, our published consultation process is attached as well as the thematic report on refraction based on stakeholder feedback.

2. On the issue of collaboration, the Vision Council of Canada noted:

- *Most recently, the Ontario Medical Association's Section on Ophthalmology attempted to establish an Eye Care Council. According to an August 29, 2009 letter from the Chair of the Section on the Registrar of the College of Optometrists, this group "was to be made up of representation from the academic and political leadership of Ophthalmology and Optometry as well as representation from Family Medicine and Opticians with participation from the MOHLTC. Initial terms of reference (enclosed) were agreed to by both Ophthalmology and Optometry however the Optometrists ultimately decided not to participate."*

The College of Opticians has made a concerted effort to engage both Optometry and medicine in our efforts to further vision care in Ontario. The unfortunate fact is that Optometry has shown a lack of willingness to participate in any discussions that would see other eye care professionals working to their fullest potential. During discussions between the Registrars of the College of Opticians and Optometrists, three very workable drafts were developed in an effort to come to terms with a negotiated framework for the issues of conflict of interest and refraction in eye care. The College of Optometrists halted discussions on this, and all matters in February of 2009 (see attached February 26, 2009 letter from The College of Optometrists of Ontario). The COO would submit that the documents be re-visited by HPRAC as a workable solution.

It's important to note that even with the current prohibitions on association, industry has developed more efficient delivery systems for vision care, systems which see three O's working collaboratively in various settings; settings which are still currently prohibited by the College of Optometrists.

3. In their submission the Society of Eye Care Professionals stated;

- *"The Society's main goals are: Public interest and protection; Harmony and collaboration of all eye care professionals through dialogue and common platforms of professional excellence. We are not an advocacy group of one professional or the other."*

As well in their answer to question 11, the Society further stated;

- *“The Society of Eye Care Professional has a unique mandate, where the focus is on 'Public Protection'”.*

However, it should be noted for HPRAC and other readers that the Society of Eye Care Professionals website <http://eyecaresociety.ca> in the “About Us” heading it states the following:

“The Society of Eye Care Professionals was formed in 2006 as an alternate voice for Opticians in Ontario.”

As well its mission statement reads;

- *“Advocating on behalf of Eye Care professionals to ensure a regulated environment where both the public is protected and the profession prospers.”*

Unlike the professional advocacy groups, Optometrist Association of Ontario and the Ontario Opticians Association, the Society of Eye Care Professionals is owned and operated by a single individual, Mr Ali Khan, former Chair of the Board of Ophthalmic Dispensers (currently The College of Opticians of Ontario). For clarity, the COO would appreciate a better understanding of the role of the Society and a list of its Members.

4. In their submission, the College of Optometrists suggests;

- *“Optometry and Opticianry are practised in different environments, with different relationships and different goals. For Optometrists, clients are patients, for Opticians, clients are customers.”*

The COO would like to point out that under the Regulated Health Professions Act, 1991, all Colleges are responsible for patient safety, and health care consumers are often called customers, clients and or patients, interchangeably. Some of the COO members work in the same environment as Optometrists (for example, in Optometric clinics). Some of the COO members work along with visiting Optometrists who perform eye exams for the Optician’s patients. Opticians and Optometrists assist the same individuals in order to achieve the same goal – tending to the patient’s eye care needs. The public of Ontario receives health care services from both Opticians and Optometrists and they should be referred to as patients.

We remain hopeful this review will result in long-term positive change promoting enhanced inter-professional collaboration in the best interest of the public of Ontario.

Should you have any questions or comments, please do not hesitate to contact us.

Best Regards,



Jeff Fernandes, RO
President



Caroline MacIsaac-Power, RO
Registrar

Encl.