

College of Optometrists of Ontario
L'Ordre des optométristes de l'Ontario

6 Crescent Road, 2nd Floor, Toronto, Ontario M4W 1T1 • Telephone: (416) 962-4071 • Fax: (416) 962-4073
Web Site: www.collegeoptom.on.ca • Toll Free: (888) 825-2554

February 26, 2009

College of Opticians of Ontario
#902 - 85 Richmond Street West
Toronto, ON M5H 2C9

RECEIVED FEB 27 2009

Attn.: Caroline MacIsaac-Power, Registrar

Dear Ms. MacIsaac-Power,

Over the past several months we have engaged in a series of discussions around collaborative practice that would have (i) broadened the ability of opticians and optometrists to work together; and (ii) allow opticians to perform refractions. The status of these discussions was recently re-considered by our Executive Committee.

By way of background, we understand that the Minister of Health and Long-Term Care directed the Council of the College of Opticians to require its members to stop performing refractions – at least until standards of practice were agreed to between the Colleges of Opticians, Physicians and Surgeons, and Optometrists. In response to this directive from the Minister, your Council established a standard of practice that was published in March 2001. Despite this ban on refracting, it is our understanding that some of your members continued to perform refractions.

In mid-2007, the College of Opticians circulated for comment a Draft Standards of Practice for Refraction dated June 2007. This College provided comments, and in our response we objected to certain provisions of the draft standard because it did not require refractions to be performed by opticians in collaboration with a physician or an optometrist. You will recall that this stipulation was a feature of HPRAC's recommendations in *New Directions*. Despite our objections, at its September 2007 meeting, the Council of the College of Opticians adopted the standards of practice with no significant changes from the draft document.

In May 2008 the College of Opticians sent out “an information package for all registered opticians who are interested in performing refractions.” This information package continues to be posted on the College's website. It includes, among other things, the Standard of Practice: Refraction; an application form; a listing of approved courses; and entry to practice competencies for refraction. Opticians were reminded that “any optician wishing to refract must first **apply** to, and be **approved** by the [College of Opticians].”

(emphasis in original) We understand that more than 40 opticians have applied and been approved by the College of Opticians. Presumably they are performing refractions.

What is problematic to our Executive Committee is that the College of Opticians has taken the course of action that it did even though the Minister's directive of 2001 has never been rescinded. By way of a letter dated July 15, 2008 to the President of your College, Dr. Tepper made the Ministry's position very clear when he wrote the following:

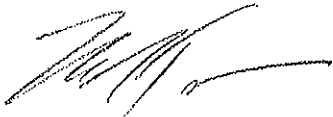
I would like to remind the College Council that the position of the ministry has not changed. This means that, in the ministry's view, members of your College should not be performing refractometry under any circumstances.

We reiterate that no new direction has been issued by any Minister since 2001 that would permit opticians to perform refractometry.

With this background in mind, the Executive Committee of this College does not believe that your Council is acting in a responsible and accountable manner. In the circumstance, our Executive believes that the Council of the College of Opticians should stop approving any new applications from opticians to perform refractions, and advise all opticians that the ban on performing refractions remains in force and effect.

Until these actions have been undertaken, I regret to advise you that I have been directed not to participate in any further discussions with you about these two important issues for our professions.

Best regards,



Murray J. Turnour, O.D., M.Sc.
Registrar

c.c.: Hon. David Caplan, Minister of Health and Long-Term Care
Mr. Abid Malik, Director of Policy
Ms. Barbara Sullivan, Chair, Health Professions Regulatory Advisory Council
Dr. Josh Tepper, Assistant Deputy Minister
Ms. Marilyn Wang, Director, Health Professions Regulatory Policy & Programs
Dr. Bill Ulakovic, President, Ontario Association of Optometrists