



STAKEHOLDER CONSULTATION PROCESS

Serving and acting in the public interest is at the very essence of the mandate of the College and its Council. Regulatory matters often follow this course most easily, while issues evolving from the practice environment and from the external arena often require clarification to sharpen the public protection perspective. Most issues before Council require a detailed analysis and criteria assessment. To assist the Council in its decision making process, the Council consults with a variety of stakeholders on issues before it approves changes in policy. This document outlines the process that the College of Opticians of Ontario will follow to consult stakeholders when considering changes to its regulations, by-laws, policies and philosophical directions. While the College may deviate or modify this process in certain circumstances, this document delineates the core principles to be followed when undertaking the consultation process.

Attached as an appendix to this document is a list of the organizations that the College considers to be stakeholders. During any given consultation process, the College may consult any or all of the stakeholders identified on the attached master list depending on the circumstances or content of a proposal.

The main steps in the Consultation Process are:

Identification of a Policy Issue

New policy issues or the need to consider changes to existing policies may be raised by individual Council Members, committees as a whole, staff or by changing external circumstances. The Executive Committee reviews the issue to determine if the issue is important for the public and/or profession and within the mandate of the College to address. If the Executive Committee determines that an issue requires the consideration of Council it presents it to the Council for consideration.

Policy Development Phase

If Council agrees that the issue requires consideration, policy development occurs. A key aspect of this process is to consider the views of a variety of stakeholders to determine what is being done in other similar professions or other jurisdictions ('benchmarking').

Council Approval in Principle

When the proposed policy is developed it is presented to Council for approval in principle. This means that the Council has approved the general direction of the proposed policy but that it is not yet an expectation of the profession.

Formal Consultation

Following approval in principle, the College undertakes a formal consultation with College stakeholders for their views on the change. For the development of regulations and certain types of by-laws, this step is a mandatory requirement of the *Regulated Health Professions Act*. When the College proposes changes to its regulations (and by-laws that directly affect registrants), it is required to circulate the proposed changes to every registrant at least 60 days before it is approved by the Council.

While there is no statutory obligation on the part of the College to consult with registrants on proposed changes to its standards of practice, the College believes it is beneficial to obtain feedback on proposed standards prior to their formal implementation. Feedback from registrants helps refine the document or guideline, which generally is developed in conjunction with the standard.

The formal consultation phase is the key to ensuring that registrants are aware of the proposal for changes or additions to regulations, by-laws or standards of practice and offers an opportunity for registrants to provide meaningful feedback.. This step is also ensures that the College has not missed any crucial elements in the policy development phase.

The College values all feedback received and each comment is reviewed in depth. However, the consultation process is not intended to provide everyone with an opportunity to receive an individual response to every question or query raised. Rather, the process is intended to provide registrants with an opportunity to participate in the development process and to identify issues with any proposed changes prior to the approval of the policy by Council and subsequent distribution or implementation.

Consideration of feedback received

All comments and submissions are reviewed using a thematic process of analysis. A report on the general themes is written, and any issues raised that suggest revisions are necessary are thus identified for Council deliberation. Council is not provided with copies of all individual responses.

Final approval by Council

The policy, standard of practice, by-law or regulation is presented to Council for final review and/or approval. This process includes Council consideration of the original proposal; the analysis of the feedback provided by registrants and other stakeholders, the proposed changes that were suggested in the consultation phase or in other considerations; and any other final positions.

As noted above, Council values all input, whether or not it is in favour of the proposals. However, when conducting its review, Council does so from the perspective of the College's statutory obligation to serve and protect the public interest. This means that the concerns

some stakeholders may identify may not be ones that the Council can respond to when setting policy. With this in mind, the consultation process should be considered as an opportunity to provide meaningful feedback and not necessarily as an opportunity to comment on the popularity of a proposal for the profession.

Information to Registrants and Stakeholders

After Council has made a decision on the policy, information on the decision is provided to registrants, usually through an article in the College newsletter. This information may also be posted on the College's website. Individual stakeholders who provided feedback may also be notified directly by the College. Some of the decisions that Council makes come into effect immediately, for example by-laws or standards. Others, like proposed regulation changes, must be sent to the provincial government for incorporation into official regulations before they come into force. Sometimes government approval can take a substantial amount of time.

Conclusion

The College recognizes the value of the consultation process when developing policies. Accordingly the College will enhance and improve the above process to ensure it continues to meet the needs of the College and provide the College with the process necessary to develop policy in the public interest.