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September 07, 2007

Caroline MacIssac-Power, RO
Registrar
College of Opticians of Ontario
85 Richmond Street West, Suite 902
Toronto, Ontario M5H 2C9

Dear Ms. MacIsaac-Power:

Re: Proposed Standards of Practice – Optician performed refraction

Although the Ontario Association of Optometrists (OAO) was not consulted as a stakeholder in the consultation process on the above subject, OAO feels compelled to comment since optometrists would be “authorized prescribers” for the purposes of the document.

A detailed review of the June 2007 document prepared for stakeholder consultation titled College of Opticians of Ontario (COO) Draft Standards of Practice for Refraction reveals that the proposed standards in fact contradict the HPRAC recommendations identified by COO in their “Fact Sheet”.

The proposed standards suggest that opticians can dispense eyewear on the basis of an optician-performed “refraction” provided that some form of “clearance” has been obtained. The “clearance” anticipates that the refractive portion of the eye examination is remotely delegated to an optician and eyewear is dispensed from the results of the optician-performed refraction. This standard is in direct contradiction to the recommendation from HPRAC that states that opticians should not be authorized to dispense eyewear solely on the basis of a refraction test. Moreover, the optician-performed refraction would not be undertaken to inform a comprehensive ocular assessment, a requirement also recommended by HPRAC.

The condition for “clearance” attempts to circumvent the intent of the HPRAC recommendation by proposing to involve an optometrist or a physician in the refraction and dispensing process. Further, the definition of “clearance” appears to establish delegation guidelines for optometrists and physicians, in addition to those for opticians.

As noted in College of Opticians of Ontario Draft Standard of Practice: Delegation (May 9, 2007), restrictions on delegation require the delegating optician to first establish a patient/practitioner relationship and to be physically present at the time of delegation. The same standards for direct supervision in the delegation of dispensing procedures should apply to the delegation of procedures in prescribing. The proposed refraction standards are inconsistent with the standards on the delegation of dispensing. There cannot be two different standards for delegation.

Both the College of Optometrists and the College of Physicians and Surgeons have policies and guidelines that prohibit their members from providing prescriptions for eye wear through remote prescribing based upon the results of refraction from an optician. COO's proposed standard is not only inconsistent with the delegation policies of the other Colleges, but also could expose an optometrist or a physician to allegations of professional misconduct.

Despite various guidelines for frequency of eye examinations, including the COS referenced guidelines, optometrists and physicians use their clinical judgment to make a recommendation for appropriate timing for future care by considering the specifics of the individual case and the patient's visual welfare. These clinical decisions cannot be delegated.

Thank you for the allowing OAO the opportunity to comment on the draft standards.

Yours truly,



Christopher Nicol, O.D.
Policy Consultant

- cc. Marilyn Wang, Director, Health Professions Regulatory
Policy & Programs Branch, MOHLTC
Dr. Murray Turnour, Registrar, College of Optometrists of Ontario
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