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October 24, 2007

Mr. Ali Badreddine, RO
President
Ontario Opticians Association
5650 Yonge Street, Suite 1500
Toronto, ON M2M 4G3

Dear Mr. Ali Badreddine,

Re: Standard of Practice for Refractometry

Attached please find a copy of the College's Standard of Practice for Refractometry and ancillary documentation that was approved by the College Council on September 25, 2007 and will be made generally available through the College's web site on October 24, 2007

From the formal submissions made by the OOA and from our numerous conversations, we readily acknowledge that this Standard of Practice falls far short of what the Association believes is both reasonable and necessary. Nevertheless, the College Council has decided to proceed with the Standard of Practice as written. On one hand, the Council is convinced that it is in the public interest to allow those Opticians who have demonstrated their competency to do so to refract, thereby enhancing the public's access to an important health care service as well as enhancing the public's choice among alternate providers of the service. On the other hand, this College is obviously bound by the controlled act provisions as they currently exist in the *Regulated Health Professions Act*, which means that this College cannot allow its members to perform the controlled act of dispensing except as provided for under the *Regulated Health Professions Act*. In preparing the Standard of Practice, the College was also mindful of the admonitions in Minister Witmer's letter dated February 7, 2001, as well as those of HPRAC in its last report to the Minister.

Accordingly, I'm asking that the Association support the College in the implementation of this Standard of Practice and collaborate with the College in your members' communications relating to the Standard of Practice.

In particular, I ask that you make it abundantly clear to your members that any registered optician who wishes to refract must go through a certification process by this College as described in the Standard of Practice. Issuance of the Standard of Practice alone does not, in any way, authorize Opticians to refract.

I look forward to hearing from you soon as to how we can work together to achieve the effective implementation of this Standard of Practice.

Yours sincerely,



Caroline Maclsaac-Power, RO Registrar

COLLEGE OF OPTICIANS OF ONTARIO
STANDARD OF PRACTICE:
REFRACTION
As approved by Council on September 25, 2007

1. An optician must have successfully completed a training program, which includes an examination component that meets the most current refracting competencies established by College of Opticians of Ontario (COO). The respective training program will not be included within the general curriculum of the opticianry program, but will rather be available as a post-graduate course. COO will provide a list of all accredited education programs.
2. If an optician intends to refract, he or she must apply to COO for 'refracting designation' through a process established by COO. Furthermore, refracting opticians must send a facsimile of all completed Patient Consent Forms to COO on a quarterly basis using the attached Patient Consent Form.
3. An optician must submit to COO at least eight (8) College-approved continuing education credits that are *specific to refraction* and which are to be submitted *in addition* to the credits required for the optician's existing Quality Assurance cycle.
4. An optician must ensure that he or she has the appropriate equipment to perform refraction such as, but not necessarily limited to, automated refraction equipment, phoropter, trial lenses, retinoscope and visual acuity charts.
5. An optician must not prepare and dispense vision devices based solely on the results of the refraction performed pursuant to clearances received from authorized prescribers, as set out in clause 6.
6. An optician may only perform refractions based on clearance from an authorized prescriber. The clearance may take one of three forms:
 - (a) The patient has seen an authorized prescriber for a full oculo visual assessment within the last 365 days. The authorized prescriber has issued a written prescription for the patient indicating that the patient requires an optical appliance subject to determination of the refractive error where the prescriber has given clearance to the optician to determine the refractive status of the eye.

In this circumstance, the optician may perform refraction and dispense the appropriate eyewear. The results of the refractive error determination and information on the optical appliance dispensed must be provided to the authorized prescriber no later than 30 days from the date that the appliance was dispensed.
 - (b) The patient has seen an authorized prescriber for a full oculo visual assessment within the last 365 days. Pursuant to the health of the patient meeting a set of predetermined conditions, the prescriber has given clearance to the optician to determine the refractive status of the eye.

In this circumstance, the authorized prescriber has determined that the health of a patient has satisfied certain predetermined health standards, where the prescriber has then authorized the optician to perform the refraction and dispense the appropriate eyewear based on the results of that refraction and any additional information that the prescriber has provided. The results of the refractive error determination and information on the optical appliance dispensed must be provided to the authorized prescriber no later than 30 days from the date that the appliance was dispensed.
 - (c) The patient has seen an authorized prescriber for a full oculo visual assessment within the last 365 days. The optician receives a referral from a prescriber giving clearance to the optician to perform a refraction on the patient. In this circumstance, the optician may perform the refraction and must provide the results of that refraction to the referring practitioner as soon as possible. The optician may subsequently receive a prescription from the authorized prescriber based on the results of the refraction, whereupon the optician may dispense eyewear to the patient.

7. An optician must use her or his knowledge, skills and judgment to refer to a physician or optometrist any indication or complications in the patient's visual or general health that comes to the attention of the optician as a result of performing the refraction.
8. In addition to the patient's file, the refraction health record for every patient upon whom an optician has performed a refraction must contain:
 - (a) Date of the refraction,
 - (b) Name of optician performing refraction and College registration number,
 - (c) Patient Consent Form (one copy per patient must be provided to the College March 31, June 30, Sept 30 and Dec 31 of each year),
 - (d) Results of the refraction,
 - (e) Name of the prescriber, date and details of clearance to refract, as well as any other instructions.
9. An optician is prohibited from performing refractions other than in accordance with the provisions of this standard of practice.



THEMATIC REPORT

Proposed College of Opticians of Ontario
Standard of Practice—Optician-Performed Refraction

August, 2007

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Outline of Feedback Procedure

Packages were mailed to 2,500 COO members and stakeholders — June, 2007 Feedback forms on the proposed issue of Refraction due to the COO — August 17, 2007 **Package Contents:**

- ¾ Fact Sheet on Refraction Standard of Practice
- ¾ The Canadian Ophthalmological Society Vision Screening Guidelines
- ¾ The College of Opticians of Ontario's Draft Standard of Practice for Refraction, Stakeholder Consultation, 2007
- ¾ A Request for Comments
- ¾ Feedback Form

General Feedback on Refraction

¾ Twenty-five responses were submitted.

¾ Of the twenty-five submissions, four were opposed to optician-performed refraction; nineteen were in agreement with optician-performed refraction; and two did not express an opinion either because they did not feel well enough versed in the topic, or because they are requesting that more information first be provided.

	Total	Percentage
Total Packages Sent	2,500	
Total Packages Received	25	1.0
¾ Positive Feedback	19	0.8
¾ Negative Feedback	4	0.2
¾ No opinion/need more clarification	2	0.08

General Perceptions of Optician-Performed Refraction

- ³/₄ **Training**
 - Provided that the optician has received the appropriate training, then she/he should be permitted to perform refractions.

- ³/₄ **Competition and choice**
 - Allowing opticians to refract will provide customers with a greater opportunity for choice and will contribute to market competition.
 - The draft document does not allow for an expansion of public choice, as the required intensive involvement of an authorized prescriber precludes any autonomy on behalf of the optician and, in turn, does not allow for market competition.

- ³/₄ **Continuing education (CE) credits**
 - It may be difficult for an optician to earn eight credits based on refracting alone. Thus, CE credits in refraction might include anatomy, retinoscopy and diabetic screening.

- ³/₄ **Authorized prescribers**
 - What is the definition of an authorized prescriber? An optometrist, medical doctor, or ophthalmologist?
 - If a patient has already had a full ocular-visual assessment performed by a prescriber, it seems unlikely that that individual would then visit an optician for a refraction test (ie. full oculo visual assessments are valid for longer than 365 days, making any refractive test within this period redundant).
 - Requiring clearance from an authorized prescriber places too many restrictions on the optician.

- ³/₄ **Unauthorized practice**
 - Allowing opticians to refract may lead to the creation of establishments that employ and permit unqualified individuals to refract.

- ³/₄ **Public confusion**
 - There is already confusion on behalf of the public regarding the scope of practice of opticians, and permitting opticians to refract will only exacerbate such confusion.

General Recommendations Regarding Optician-Performed Refraction

¾ Restrictions

- Opticians should be permitted to perform refractions only on individuals between the ages of 18 and 60; and only on such individuals with an acuity of 20/30 (or whatever seems appropriate).

¾ Standard of Practice

- The proposed Standard of Practice for Optician-Performed Refractions should include the provision that refraction by opticians be performed only under the direct supervision of the prescribing doctor. While the DRAFT Standard of Practice does not prohibit an optician from performing refractions under supervision, it does not require it.

Clause 4(a) and 4(c) should be removed from the Standard of Practice, as they are inconsistent with HRRAC's advice to the Minister, which is that refraction be limited to "those circumstances where such refracting is undertaken in collaboration with an optometrist or a physician for the

Quotations from Feedback

“I agree with the proposal set forth; if the optician has the appropriate training and desire to perform refraction, they should be able to.”

“I do not think opticians are capable of doing any proper refraction....I do not think opticians can define [macular degeneration, cataracts and floaters] from this instrument....even with the refraction course training it is never sufficient.”

“Opticians can perform refracting without special authority from any other health care professional. Refracting is not a reserved activity and the 2006 HPRAC report to the Minister confirmed that fact. Opticians who dispense contact lenses perform refracting in the course of completing a contact lens fit. The restrictions in this draft document seem to impose unnecessary limitations on this practice.”

“To return to the Ministry of Health and Long-term Services with a Standard of Practice that does not move the refracting initiative forward can have the effect of undermining not only the professional goals of Ontario Opticians but also the forward momentum that has been generated by the work of Opticians in other provinces.”

“As far as Continuing Education, it could be hard to get eight credits purely based on Refracting.”

“In a real world this all sounds fine and dandy but what optometrist is going to delegate the refracting part of the ocular-visual assessment to an optician? If a patient has had a full ocular-visual assessment why would they be going to an optician for refraction? There are too many restrictions that would not only be confusing to the optician let alone the patient.”

“My biggest fear is that this will open the door to many more cut rate establishments who will not have qualified people doing the job correctly.”

“Will this best serve the elderly who at times have other health issues that are diagnosed by a thorough eye exam. Again, I reiterate, which serves the public best?”

“We could certainly follow the guidelines that the provinces of Alberta and British Columbia have adopted, performing sight testing between the ages of 19 and 65 without the involvement of a physician or optometrist.”



BACKGROUND - COLLEGE OF OPTICIANS OF ONTARIO STANDARD OF PRACTICE: REFRACTION

The College of Opticians has prepared this Background in order to put the Standard of Practice: Refraction in context.

On February 7, 2001 the Minister of Health and Long-Term Care (who at that time was Mrs. Elizabeth Witmer) directed the College of Opticians to require its members to stop performing refractions. The Minister requested that the College maintain this ban until a Standard of Practice on refraction was developed collaboratively with the College of Optometrists and the College of Physicians and Surgeons of Ontario.

The College of Opticians firmly believes that it is in the best interest of the public that Opticians who have been formally trained in the theory and methods of refraction should be permitted to offer such a service to the residents of Ontario. Optician-performed refraction will not only increase the public's access to an important health care service, but it will also allow for greater patient choice among alternate regulated providers. Accordingly, the College of Opticians has worked diligently and in good faith to develop a workable Standard of Practice that clearly separates the performance of the public domain act of refraction from the controlled act of prescribing. This Standard of Practice allows Opticians who are certified to do the former, while restricting their performance of the latter to situations that conform in all respects with the controlled act provisions of the *Regulated Health Professions Act*.

In its report "New Directions" published in April 2006, HPRAC recommended that the ban on refraction be lifted and that the College of Opticians develop a Standard of Practice

".....that (limits) the authority of (Opticians) who perform refractometry to those circumstances where such refracting is undertaken in collaboration with an optometrist or a physician for the purpose of informing a comprehensive ocular assessment."

The Standard of Practice: Refraction has been developed by the College of Opticians to achieve those objectives.

Members who wish to refract must review the Standard of Practice in detail and understand that compliance with what is stipulated in the document is required. Members are reminded that there is a stringent process in place that outlines the criteria that Opticians must adhere to in order to perform refractions in Ontario. It is important to understand that ***Opticians may not begin to refract until an application has been approved by the College.***

The Refraction Patient Consent Form referred to in the Standard of Practice **MUST** be completed for each patient. All Refraction Patient Consent Forms (one copy per patient) must be provided to the College on March 31, June 30, September 30 and December 31 of each year. Compliance with the Standard of Practice requires completion and submission of all consent forms. The information contained therein will be aggregated and analyzed in order to better understand and track any changes in the environment in which Opticians refract.

Refraction Patient Consent Form

The information you provide will be held in the strictest confidence

A. Patient Information

Last name	First name	Middle name	
Date of Birth (yyyy/mm/dd)	Home telephone no.	Work telephone no.	
Apartment	Street number and name, or lot, concession, and township		
City	Province	Postal Code	Occupation:

B. Notice to all Patients - "Please read the following carefully"

Important: A refraction is a quick, safe and accurate way for individuals to have their vision checked before purchasing new eyewear. A refraction, however, is not an eye health exam. While a refraction is very accurate at measuring an individual's visual clarity and determining the power of corrective lenses, it is not intended to identify underlying eye health problems that may affect vision that are more likely to be found during an eye health exam. Some medications have the potential to affect your eyes. Therefore, individuals with underlying health problems or eye-health risk factors need to have an eye health exam.

An ophthalmologist or optometrist, not an optician, conducts an eye health exam. We require you to have had an eye health examination conducted by a physician or optometrist in the past 365 days prior to the refraction test.

Have you recently worn eyeglasses?	If yes, how are the eyeglasses used?	Do you wear contact lenses?
<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Distance <input type="checkbox"/> Near	<input type="checkbox"/> Both <input type="checkbox"/> Yes <input type="checkbox"/> No

C. Patient History

Date of last complete eye exam:	Date of last medical exam:	Date of last Registered Optician Refraction:
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If you experience any of the following symptoms relating to your eyes, please check the boxes that apply:

<input type="checkbox"/> Blurred while reading	<input type="checkbox"/> Itching	<input type="checkbox"/> Burning	<input type="checkbox"/> Sensitive to light
<input type="checkbox"/> Blurred a distance	<input type="checkbox"/> Headaches	<input type="checkbox"/> Red eyes	<input type="checkbox"/> Excessive blinking
<input type="checkbox"/> Double Vision	<input type="checkbox"/> Tearing	<input type="checkbox"/> Pain around eyes	<input type="checkbox"/> Squinting
Other Problems: _____			

Review by Registered Optician:

D. General Health and Eye Health

Please check all that apply:

<input type="checkbox"/> Pregnant	<input type="checkbox"/> High Blood Pressure	<input type="checkbox"/> Diabetes	<input type="checkbox"/> Glaucoma
<input type="checkbox"/> Cataracts	<input type="checkbox"/> Blindness	<input type="checkbox"/> Hypoglycemia	<input type="checkbox"/> Cancer
<input type="checkbox"/> Arthritis	<input type="checkbox"/> Respiratory Problems	<input type="checkbox"/> Circulatory Problems	<input type="checkbox"/> AIDS / HIV +
<input type="checkbox"/> High Cholesterol	<input type="checkbox"/> Crossed or turned eye	<input type="checkbox"/> Lazy Eye	<input type="checkbox"/> Retinal Disorder
Other Problems: _____			

E. Family History

Do any of your blood relatives have any of the above conditions? Yes No

If yes, please list which conditions: _____

Review by Registered Optician: _____

F. Review of Ocular Conditions

Direct consultation between Registered Optician and the patient:

1. Patient is either under 19 or over 65 years of age	Yes	No
2. Preliminary evaluation indicates poor eye health	Yes	No
3. Does the patient have a history of Glaucoma?	Yes	No
4. Does the patient have a family history of Glaucoma?	Yes	No
5. Does the patient have a history of Strabismus?	Yes	No
6. Does the patient have a family history of Strabismus?	Yes	No
7. Does the patient have a history of Diabetes?	Yes	No
8. Does the patient have a family history of Diabetes?	Yes	No
9. Does the patient require prismatic correction?	Yes	No

10. Does the patient have any visual anomalies?	Yes	No
11. Does the patient currently have cataracts? 1 2. Does the patient have a history of cataracts? 1 3. Does the patient have a family history of cataracts?	Yes	No
14. Does the patient have AMD*?	Yes	No
15. Does the patient have a history of AMD*?	Yes	No
16. Does the patient have a family history of AMD*?	Yes	No
17. Visual acuity correctable to 20/40 in each eye	Yes	No

*AMD = Age Related Macular Degeneration

If this review indicates a YES to any of questions 1 - 16, or NO to question 17, in the above, the patient _____ **must** be immediately referred to an ophthalmologist or optometrist for a complete eye examination.

This consultation is solely intended to determine your suitability to receive a vision test for the purpose of obtaining corrective lenses by a Registered Optician. Please note that a vision test *does not* diagnose the health of your eye .

Referral appointment with Dr. _____ on _____ at _____

A REGISTERED OPTICIAN IS NOT A DOCTOR.

A Registered Optician is a regulated health professional who is trained to provide vision testing for the purpose of updating eyeglass or contact lens prescriptions when the specific conditions reviewed above have all been met. This document is not a waiver but is intended to serve as a guideline to which the Refracting Optician can refer when determining a patient's suitability to receive a vision test.

Patient Signature: _____

Registered Optician Signature: _____

Date: _____

Date: _____

How To Tell the Difference Between a Registered Optician, an Optometrist and an Ophthalmologist

Registered Optician: A Registered Optician is not a doctor. A Refracting Optician is a health professional who is able to provide vision testing for the purposes of updating eyeglass or contact lens prescriptions when the specific conditions reviewed in this form have all been met. A Registered Optician can fit and dispense corrective eyeglasses, contact lenses and subnormal vision devices.

Optometrist: An Optometrist is a Doctor of Optometry. An Optometrist is able to diagnose eye health, provide some treatment, prescribe some medications, write optical prescriptions and dispense eyeglasses and contact lenses.

Ophthalmologist: An Ophthalmologist is a medical doctor who specializes in eye health. An Ophthalmologist is able to diagnose all eye health problems and many other general health concerns, provide treatment and prescribe medication, perform surgery when necessary and write optical prescriptions. Ophthalmologists generally do not dispense eyeglasses and only occasionally dispense contact lenses.

The College understands the importance of protecting personal information. The personal information collected on this form will be used by the College for the sole purpose of regulating the profession of Opticianry in the interest of the public.

To confirm that you have read and comprehend the foregoing, please take another minute and answer the following question:

A refraction conducted by an optician is equal to a full ocular visual examination Yes No