

APPENDIX: E

April 14, 2005

Cathi Mietkiewicz, President
College of Opticians of Ontario
85 Richmond Street West, Suite 902
Toronto, ON
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Dear Cathi,

The Heads of Opticianry Programs in Ontario appreciate the opportunity to respond to the call by the Minister of Health for advisement related to the risk of harm of dispensing prescription eyeglasses.

Both Georgian College in Barrie and Seneca College in Toronto offer an Ontario College Diploma to prepare opticians for employment in this province. This diploma program was developed conjointly and involves two full years of education (or equivalent) including 1,000 hours of practicum in the workplace under the supervision of a Registered Optician, Optometrist, or Medical Doctor. The Ontario Opticianry Diploma Program provides students with a broad and integrated knowledge of the theoretical and applied principles of the physiological aspects of the visual system in order that graduates may competently and, moreover, safely dispense optical appliances including eyeglasses, contact lenses and low vision aids.

In state of the art dispensing facilities under the tutelage of college faculty, students "acquire the specialized knowledge and skill to safely and competently" perform the role of optician. Only those licensed by the College of Opticians of Ontario or provided a "student license" while in the program, are allowed to perform this function. Regulation of this practice clearly acknowledges the importance of vision in overall health and ensures safe, ethical, high quality eye care by specially trained providers that are part of the total healthcare team.

Furthermore, both programs are administered within a School of Health Sciences framework reporting at the provincial level to the Heads of Health Sciences, a sub committee of the Association of Colleges of Applied Arts and Technology of Ontario and ultimately to the Ministry of Training, Colleges and Universities. This positioning is an acknowledgement that opticians work in healthcare and are rightfully governed by such measures as scope of practice and rules of professional conduct. Unregulated professions such as home inspection need no such umbrella within which education and professional development are provided in the province.

On the national front, both programs consult with provincial opticianry educators through membership in the National Committee on Opticianry Education (NCOE), regulators through NACOR (National Association of Colleges of Opticianry Regulators),

and related associations through OCC (Opticians Council of Canada). Ongoing program advisement is further supported on a local basis by program-specific Academic Advisory Committees that include representation from Ophthalmology, Optometry and Opticianry. In this way, the programs' goals and methodologies are kept current and students benefit from the wisdom of the related professions.

Patient safety is paramount. Students are extensively trained to ascertain anatomical measurements consistent with prescribed refractive power, lens tolerances, and frame selection. They must develop a high level of analytical and interpretive skill to determine whether corrective lenses will address the patients' visual needs. To facilitate learning in this area, adverse effects of improperly fitted appliances are studied extensively. As demographics shift toward the prevalence of older patients (many of whom have undergone ocular surgery for cataracts), opticians routinely fit monocular-aphakes taking into consideration the resultant aniseikonia and overall performance of their eyeglasses. Course work emphasizes the management of pseudo-aphakia as well as pediatric dispensing. As it is the ultimate responsibility of the optician to verify the patients' prescription and fitting parameters prior to dispensing the finished pair of eyeglasses and/or contact lenses, these subjects are substantially weighted in the curriculum. Changes to legislation that would permit unskilled persons to dispense eyeglasses would unleash a significant potential for harm to the public.

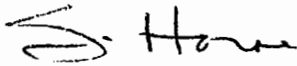
Upon graduation from the program, students demonstrate a sound understanding of key aspects of opticianry and vision science leading to the achievement of satisfactory performance in *each* of the Entry to Practice Competencies for Opticians in the Province of Ontario. Before they are considered successful graduates of these programs, students are required to demonstrate expertise in prescription analysis and interpretation, ophthalmic dispensing procedures and the management of the visually impaired. Building on a solid theoretical foundation, students learn practical dispensing skills. The graduate, like the curriculum, is client-oriented. The optician must ensure that, before a patient leaves his/her care, all that can be done has been done to improve the patient's visual acuity (within the optician's scope of practice). To achieve this mandate, the optician must have and apply a clear and in-depth understanding of what is normal and abnormal related to the eye and ocular health.

The graduates of the Opticianry Programs offered by Ontario Community Colleges are well qualified to provide the essential services to ensure public safety. Regulations that require ongoing continuing education for opticians serve to ensure that they maintain currency in this dynamic field. To rescind or narrow the current legislation with respect to eyeglass dispensing would compromise patient safety and the overall public good.

It is worth noting that, while the topic of risk of harm related to dispensing eyewear is being discussed in Ontario, both of the Ontario colleges preparing tomorrow's opticians for work in this field (Georgian and Seneca) have been approached by educational institutions from other countries in the world to make the Ontario programs available there. In these underdeveloped countries, persons with a retail

orientation are able to perform roles related to eyewear. Concern for ocular health has given way to a concern for enterprise. The Seneca/Georgian program is seen by these countries as highly desirable and a means to shift the values toward a health orientation. It is Seneca and Georgian College's belief that the regulation of this important occupation is tantamount to continuing our country's leadership in valuing health, life, and maintaining an appropriate balance between industry, enterprise, and individual health.

Sincerely,



Susan Horne, Chair
FCET, Seneca College



Cassandra Sines-Thompson, Dean
Health Sciences, Georgian College



Linda Wren, Coordinator
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Janice Schmidt
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cc: Renee Kenny, Heads of Health Sciences