

# **APPENDIX: NN**



College of  
Physicians  
& Surgeons  
of Alberta

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December 12, 2002

Ms. Georgann Wilkin  
Director, Health Professions  
Alberta Health & Wellness  
17th floor, Telus Plaza North Tower  
10025 Jasper Avenue NW  
PO Box 1360 STN Main  
Edmonton AB T5J 2N3

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Alberta Health  
Health Workforce  
Services

Dear Ms. Wilkin:

**Subject: Proposed Regulations for Opticians**

In that I am appearing before the Health Professions Advisory Council on January 22<sup>nd</sup> on other matters, I will stay for the presentation by the College of Opticians of Alberta and will be prepared to speak to our College's response to that proposal, if requested.

As you are aware, the College of Physicians and Surgeons of Alberta replied to the proposed regulations for opticians before the November 30, 2002 deadline expressing no objection to them. In summary, our Council's legislative committee is satisfied that the public interest will not be jeopardized by the expanded scope of practice requested by opticians.

The proposal by opticians is to perform refractions and prescribe corrective lenses to persons who are between 18 and 65 years of age with:

- no history of glaucoma, uncorrected strabismus, uncontrolled diabetes or other evidence of eye health problems;
- healthy appearing eyes on inspection;
- a corrected visual acuity of 20/40 or better; and
- changed corrective error of no greater than 2 Diopters.

The program of instruction offered by the Northern Alberta Institute of Technology (NAIT) and the examinations of competence for eyeglass opticians and contact lens opticians have proved adequate for the profession of opticianry for many years. The newly created and very detailed blueprint of professional competencies (prepared by the College of Opticians of Alberta) and the training and assessment for refracting and the prescribing of corrective lenses (offered by NAIT) have also been reviewed by consultants and appear to prepare practitioners who are competent for the intended

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scope of practice. Those practices will not include ocular health assessments, which still remain the domain of other health professionals trained in their performance and interpretation.

Hypothetical "health risks" that might follow a separation of refractions from ocular health assessments have been hotly debated in North America for many years. The College of Physicians and Surgeons is aware of the arguments and believes that the public does not face a real threat of undetected disease or other harm if the above proposition is enacted. Firstly, an ocular health assessment is not the best way to screen for systemic disease. Secondly, the current proposal should identify any significant risk of eye disease requiring referral for medical assessment.

New practitioners in new roles have always been a part of our evolving healthcare system. We believe that patients and healthcare providers alike will adapt with little misunderstanding if they also begin receiving refraction services from opticians.

All regulated health professions are accountable to the public for the competent and ethical conduct of their respective members. We have faith that the Government of Alberta will allow nothing less for opticians.

Sincerely,



B.D. Ward, MD  
Assistant Registrar

BDW/tr