

APPENDIX: O

**Ministry
of
Health**

**Ministère
de
la Santé**



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December 30, 1999

*BH 00 01 07
forwarded to RWC & DR*

Ms. Jean Warbucks
President
College of Opticians of Ontario
85 Richmond Street West, Suite 902
Toronto, ON
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Dear Ms. Warbucks:

I am writing in follow-up to our meeting with officials of your college and those from the Colleges of Optometrists and Physicians and Surgeons to reiterate the Ministry's expectation that the Council of the College of Opticians reconsider their policy regarding refractometry being within the scope of practice for opticians at its January 27, 2000 Council meeting.

At our November meeting, you had indicated that you would hold bilateral meetings with the other colleges and keep the Ministry informed of your activities. Marilyn spoke with you a few weeks ago and it was her understanding that your Executive would be meeting with that of the College of Optometrists before your January Council meeting. As indicated in earlier correspondence, the Ministry requires Council to fully reconsider the issue and make an informed decision based upon a full, written analysis and information from your consultation process. Council must consider how the proposed inclusion/change in opticianry's scope of practice with regard to refractometry furthers the College's statutory duty to serve and protect the public interest. We continue to require a final report by January 15, 2000, which is to include but not be limited to:

- a full, written analysis respecting refractometry
- refractometry's role within the practice of the profession
- training required for an optician to carry out refractometry
- how refractometry within the profession affects related health professions,

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- its impact on College governance issues such as registration, standards of practice, complaints and discipline,
- a strong public interest justification and
- information about the consultation process involving members, related health professions and consumers.

We also confirm, as outlined in our correspondence, that a decision report must be submitted to the Ministry which outlines Council's decision after its full reconsideration and final resolution of the matter in January. This report must include the discussion at council, the questions raised and information provided, and the rationale for the decision taken, as well as the number of professional members and number of public members participating in the discussion and decision. It must also include the decisions that Council makes regarding next steps and the direction it gives to staff regarding the content of communications to members.

Several points were discussed at our meeting which need to be considered by your Council and be included in the final report.

- How will the public receive more complete vision care from an optician if opticians can perform refractometry within their scope of practice under the current statutory requirement of requiring a prescription from an optometrist or physician for dispensing
- How an assessment by an optician differs from that of an optometrist and the role of refractometry in an assessment by an optician versus that of an optometrist. There was discussion at the meeting of the assessment differing for eyeglasses versus contact lenses for the optician. Please elaborate on this in your report and in particular how this relates to the statutory rights and responsibilities of the College
- How will refractometry, performed by opticians, yet still requiring a prescription from a physician or optometrist, alleviate problems which the public have in obtaining timely appointments with an optometrist or an ophthalmologist, and how does this relate to furthering the College's statutory duty to serve and protect the public.

Establish a professional relationship

When you submit the final report also include the documents you will use to make the presentation to Council and/or use to facilitate discussion. As with the preliminary draft report please provide the final report and any accompanying documents to the Ministry and the Colleges of Optometrists and Physicians and Surgeons.

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I emphasize that Council must reconsider the issue of refractometry being within opticianry scope of practice after having the benefit of studying a comprehensive evidence based report based on current statutory provisions and that council members keep uppermost in their decision-making the College's duty to serve and protect the public interest. I also reiterate that it is not within the powers of the College to unilaterally determine that refractometry is within the opticianry's scope of practice so we would expect that any decisions or motions taken by the College in this regard would be in the form of advice to the Minister or a request for a referral to HPRAC.

Sincerely,



Mary Beth Valentine
Director

- c. Dr. Susan Cooper, President, College of Optometrists
Dr. Murray Turnour, Registrar, College of Optometrists
Cathy Fooks, Director of Policy, College of Physicians and Surgeons
Brad Graham, Assistant Deputy Minister (A)
Marilyn Wang, Manager, Direct Payments and Regulatory Programs