

# **APPENDIX: S**

Ministry  
of  
Health

Ministère  
de la  
Santé

Bev's



Office of the Minister

Bureau du ministre

10th Floor, Hepburn Block  
80 Grosvenor Street  
Toronto ON M7A 2C4  
Tel (416) 327-4300  
Fax (416) 326-1571

10<sup>e</sup> étage, édifice Hepburn  
80, rue Grosvenor  
Toronto ON M7A 2C4  
Tél (416) 327-4300  
Télééc (416) 326-1571

FEB 07 2001

Jean Warbucks  
President  
College of Opticians of Ontario  
85 Richmond Street West, Suite 902  
Toronto, ON M5H 2C9

Dear Ms. Warbucks:

I have attached the advice from the Health Professions Regulatory Advisory Council ("HPRAC") concerning the refractometry scope of practice referral.

In its advice, HPRAC clearly states that refractometry is not part of the scope of practice for Opticianry. It is important to note that HPRAC expressed concerns about opticians using refractometry to generate or alter a prescription without the involvement of a physician or optometrist. With respect to the College's ability to govern the performance of refractometry by its members, HPRAC determined that colleges have the authority to govern activities that are not within a profession's scope of practice provided they are reasonably related to the practice of the profession. HPRAC's advice is clear that the establishment of standards of practice does not change or affect the legislated scope of practice for a health profession.

I have carefully considered HPRAC's recommendations and accept its advice. In light of my decision, I request that the College Council immediately inform the members that refractometry is not part of the scope of practice under the *Opticianry Act, 1991*.

Most importantly, because HPRAC expressed concern that the performance of refractometry by opticians could circumvent the public safety measures within the *Regulated Health Professions Act, 1991* ("RHPA") and because we feel that HPRAC's advice is in keeping with the public interest mandate underlying the RHPA, I am requesting that the College immediately take appropriate steps to prohibit the performance of refractometry and the altering of a prescription by its members.

I suggest as a first step in implementing this advice, the Council communicate that opticians may not perform refractometry or alter prescriptions when dispensing.

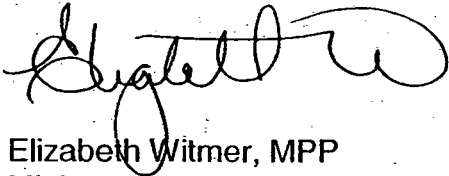
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on Feb 12/01

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Following this announcement to your members, I also recommend that the College consider means of ensuring that opticians observe this restriction. The restrictions on opticians' activities must remain in place until the College of Opticians, the College of Optometrists, and the College of Physicians and Surgeons develop effective and enforceable evidence-based standards of practice for the performance of refractometry by opticians that are in the public interest. I expect that all colleges will strive to work collaboratively on these issues.

If participation by the Ministry of Health and Long-Term Care is required to further the collaborative efforts of the colleges to resolve this issue, please contact Mary Beth Valentine, Director of the Program Policy Branch.

Sincerely,



Elizabeth Witmer, MPP  
Minister

c.c. Dr. Susan Cooper, President, College of Optometrists of Ontario  
Dr. Rocco Gerace, President, College of Physicians and Surgeons of Ontario  
Robert Alder, Chair, Health Professions Advisory Council  
Mary Beth Valentine, Director, Program Policy Branch, MOHLTC

The Ministry of Health has changed its name to the Ministry of Health and Long-Term Care.  
To avoid extra costs, we are using our existing letterhead paper before printing a supply with the new name.

Le ministère de la Santé a changé de nom: ministère de la Santé et des Soins de longue durée. Afin d'éviter des coûts supplémentaires, nous utilisons le stock de papier en-tête en réserve avant d'imprimer une provision portant le nouveau nom.