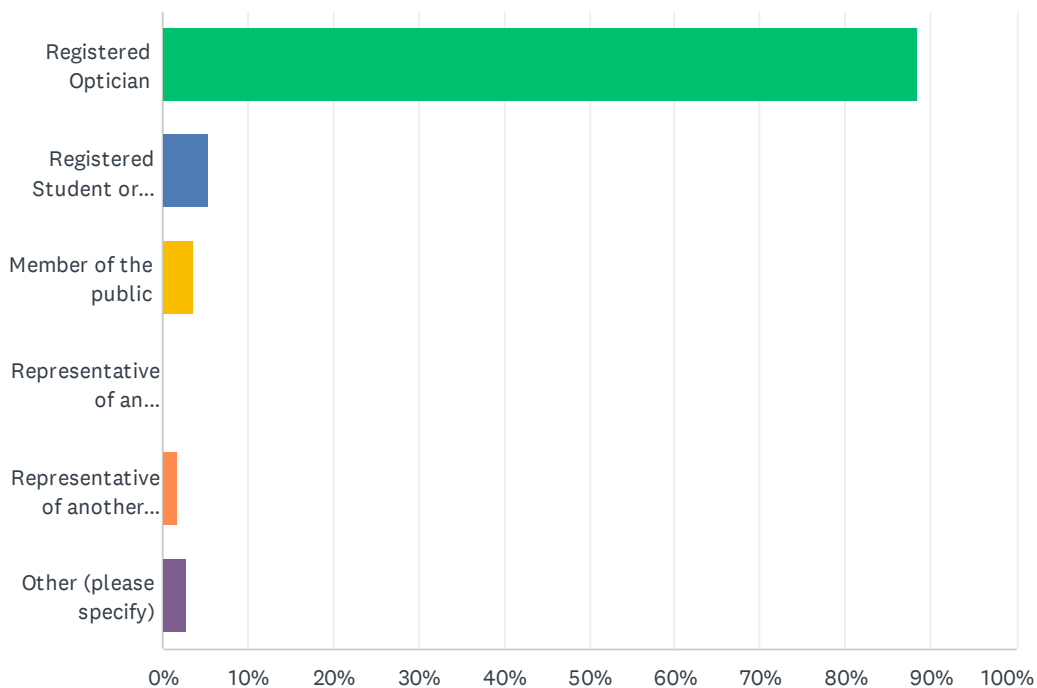


Q1 Please indicate if you are a :

Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Registered Optician	88.39%	99
Registered Student or Intern Optician	5.36%	6
Member of the public	3.57%	4
Representative of an optician association	0.00%	0
Representative of another regulatory body	1.79%	2
Other (please specify)	2.68%	3
Total Respondents: 112		

#	OTHER (PLEASE SPECIFY)	DATE
1	Registered Optician (cannot check box)	3/19/2023 9:28 AM
2	isa	3/15/2023 7:47 PM
3	non registered optician	3/15/2023 3:48 PM

Q2 Please provide any comments or feedback on the proposed amendments to the Registration Regulation.

Answered: 112 Skipped: 0

#	RESPONSES	DATE
1	I agree with idea of opening Temporary Emergency Class which help providing more human resource in condition of emergency situation.	3/30/2023 11:56 PM
2	Agree with the new amendments	3/30/2023 11:25 PM
3	I like the concept. It can help small independent Opticians deal with such emergencies.	3/30/2023 4:57 AM
4	I'm 50\50 on this Bill. Still wondering if this is something that will benefit us or not. Yes maybe for the time being but in the long run, I'm not sure. Maybe it's taking jobs away? Maybe it will drop our professionalism and \$ Not sure still need to assess it carefully. Noticing the kids coming out of the program have no ethics on professionalism , this new course will make it worse. So I'm on the iffy till we dig deeper. Tx	3/29/2023 10:41 AM
5	As it is Voluntary for retired opticians to be recalled for the temporary emergency class, I can only assume that most would find no issues in amending the registration regulations. However, I fail to see the purpose of this considered amendment. What service would an optician offer in the wake of another pandemic or health emergency? An optician cannot diagnose, nor can they prescribe any medication, therefore it is fair to ask what role we might play in the treatment of patients? As a result of the COVID-19 pandemic many opticians found themselves displaced, either by a drastic cut in their hours or being laid off and left without employment. I, as well as 3 of my fellow optician colleagues were laid off during the pandemic. Shortly thereafter we were terminated by our employer as the Optical's normal operations were not allowed to continue as per usual. With the restrictions imposed by the government and in turn the college our profession was impacted drastically in a very negative way. If anything, opticians we're in less demand, therefore the demand for more opticians, specifically those who are no longer in the profession seems to be extremely inaccurate. It would be welcome if the college could clarify what role opticians would and could be expected to undertake in the event of pandemic or health emergency in the future. Is it the colleges assumption that there is a potential need for opticians to be of some aide to emergency or is solely to maintain our ability to be a regulated profession? If opticians are meant to serve the public and operate as we would outside of a health care emergency, I see absolutely no reason to recall those who have retired from the profession.	3/28/2023 7:46 PM
6	I think it's a good idea, being prepared for all or any situation is always the better way to go. Preparedness for all possible emergencies is never wrong; we just hope it's not needed:) Proactive is always best!!	3/28/2023 10:38 AM
7	As an optician every year we go to various seminars and we keep up to date with our knowledge and we also pay every year to keep our license in order.	3/27/2023 2:30 PM
8	I do agree with this proposal and hopefully it will work out well for opticians who "have been out of practice for over three years but are able to demonstrate evidence of having practised opticianry in the previous six years" That also means they don't need to restudy a whole entire 2 years like a new freshman. It will likely save those opticians not just materials but also their time.	3/27/2023 6:29 AM
9	All good	3/26/2023 3:24 PM
10	N/A	3/25/2023 11:14 PM
11	No further comment	3/25/2023 4:44 PM
12	Seems good	3/25/2023 2:52 PM
13	It is great to back up our community provided the retired person is healthy and can provide the service. I personally will retire when my energy is almost depleted unless otherwise there is no point of retirement. Whatever I can do to support my community, I will do. Thanks.	3/23/2023 11:07 PM

Registrant and Stakeholder Consultation - Temporary Emergency Class

14	It is an important change of the amendments to Registration for the particular groups of HEALTH CARE WORKERS only, such as, medical Doctors and Nurses. I can not think of any emergency situation that requires additional registered Opticians. however, it does not hurt to have the new emergency amendments to the Registration Regulation ready.	3/23/2023 3:47 PM
15	.	3/23/2023 11:24 AM
16	Good clear guidelines and it protects the public well	3/22/2023 11:26 AM
17	I like it	3/21/2023 4:43 PM
18	The SCO has reviewed the proposed amendments to the Registration Regulation and finds them well-written and does not have any changes to suggest to the proposed amendments.	3/21/2023 3:07 PM
19	OK, understand the need	3/20/2023 3:50 PM
20	I AGREE WITH THE PROPOSED AMENDMENT.	3/20/2023 12:17 PM
21	I have 23 years of experience in optometrist and Optician in Sri Lanka I don't have Ontario licenses to practice please help me get the license and do good service canada Thanks	3/20/2023 11:15 AM
22	I have 23 years of experience in optometrist and optician in Sri Lanka I do not have in Canada Please help me get the license and do a good services to Canada with my experience Thanks	3/20/2023 10:59 AM
23	citing:"The emergency class will be available to opticians who have been out of practice for over three years but are able to demonstrate evidence of having practised opticianry in the previous six years." The emergency class does not include someone that has not renewed with the CO of Ontario for more than three years but worked somewhere else in Canada or internationally? How will this class facilitate the entrance to labor market with a swift fast processing?	3/20/2023 10:43 AM
24	I don't think its a good idea because if an optician is non registered how are they keeping up with any protocols	3/20/2023 9:50 AM
25	The new amendment is a very useful way for opticians who had health issues or family issues and get be at their workplace for while.	3/20/2023 8:49 AM
26	With the manner in which we were closed down during the beginning of the pandemic in March of 2020 I am unsure of what would create such a need to reinstate opticians. I also wondered how long it would take to reinstate them? How fast could everything be processed on the college's end? It seems that a lot of thought and money went into the proposal to the cost of opticians through our fees and honestly it seems like a waste of our funds. If this is needed to keep us regulated to keep our status as a health care necessity than I guess it is alright, but for any other reason seems like a waste.	3/20/2023 8:12 AM
27	It should be an easy process for any optician to get there license back if they decide to get out of the field for a period of time (parents who take 5 or so years off work to take care of children, or switching careers for a while). Emergency act or not there should be an easier process. The over all skills of an optician don't change, it's just a simple matter of learning the new products out.	3/19/2023 4:09 PM
28	I do not want us to do anything with this emergency preparedness because if mandated our College will be dictated to what had to be done by the government, we should be independent from that	3/19/2023 2:03 PM
29	No Comment	3/19/2023 9:38 AM
30	Good idea	3/19/2023 9:29 AM
31	The proposed amendments are sensible and appropriate. In the event of a public health emergency, it will certainly allow more opticians to provide needed optical services to the public.	3/19/2023 9:28 AM
32	In my opinion, it would be a great idea to creat an emergency class. For sure optician would get benefit of that. With thanks	3/18/2023 11:25 PM
33	None	3/18/2023 6:29 PM
34	I agree with these changes and will follow the regulations.	3/18/2023 5:34 PM

Registrant and Stakeholder Consultation - Temporary Emergency Class

35	Compatibility standards have to be a requirement	3/18/2023 3:26 PM
36	Not available.	3/18/2023 8:52 AM
37	all good thanks. Regards	3/17/2023 4:38 PM
38	I have worked in a lot optical stores and seen a lot salesperson do the same thing as optician, for example adjust frame, do the fitting for PAL or contact lens patients. In my opinion if the public emergency really occurred, those salesperson can be trained and qualified to be an emergency optician.	3/17/2023 4:37 PM
39	no	3/17/2023 2:43 PM
40	The real question I have is: will this allow them to do ANYTHING else?	3/17/2023 2:41 PM
41	There is no need for this, This is a waste of time.	3/17/2023 11:16 AM
42	not necessary	3/17/2023 10:16 AM
43	I personally don't think this is necessary. Throughout the pandemic we were not deemed as essential and most of our staff was temporarily laid off except managers. Three years later there was no issues to my knowledge of not having enough opticians during this time. I don't believe this is necessary and believe this mandate should not be put into effect	3/17/2023 9:51 AM
44	I just don't see why this would be necessary?	3/17/2023 9:11 AM
45	Hopefully we don't get to see another emergency again. I would support good standing members.	3/16/2023 11:18 PM
46	Whatever is best.	3/16/2023 2:57 PM
47	I understand the proposed amendments.	3/16/2023 2:29 PM
48	I think it is a good idea to have this in place.	3/16/2023 1:33 PM
49	In my opinion , this amendment would be useful in case of emergency	3/16/2023 1:14 PM
50	Yes its good	3/16/2023 11:33 AM
51	Nice proposal.	3/16/2023 10:50 AM
52	NA	3/16/2023 10:48 AM
53	In my opinion there is no need for any changes. The proposed changes will complicate everything and we will loose public trust.	3/16/2023 10:40 AM
54	I fully support the Colleges proposals in full, and that the public will be well served.	3/16/2023 9:46 AM
55	Nothing	3/16/2023 9:42 AM
56	College of Opticians already has a robust, fair and equitable system for internationally trained Opticians to become licenced. The College could do more to promote this to new immigrants but outside of that, I believe there is and always has been a clear path to registration in Ontario for Opticians for over 20 years(my knowledge in this area) All systems need tweaking but I believe not as much as College of Optometrists or College of Ophthalmology, College of Physicians and Surgeons etc	3/16/2023 9:40 AM
57	Has to take into account of inflationary conditions due to economic situations at that particular time.	3/16/2023 9:33 AM
58	I am in favour of this proposed amendment. A retired optician should be able to practice in a limited capacity ongoing.	3/16/2023 9:21 AM
59	I think this is a good proposition	3/16/2023 9:19 AM
60	great idea !	3/16/2023 12:53 AM
61	Action required to reach out and help as many people as possible.	3/16/2023 12:17 AM
62	Good	3/15/2023 11:38 PM
63	Agree	3/15/2023 9:52 PM

Registrant and Stakeholder Consultation - Temporary Emergency Class

64	Disagree	3/15/2023 7:47 PM
65	none	3/15/2023 7:23 PM
66	It's a good idea to allow registration anytime professionals are required.	3/15/2023 7:18 PM
67	Fantastic guidance and good service	3/15/2023 6:49 PM
68	I am aligned and think it is a great plan	3/15/2023 6:40 PM
69	Should be a continuing extensive class that are credit for all Registered temp Optician	3/15/2023 6:38 PM
70	Need more details	3/15/2023 6:38 PM
71	n/a	3/15/2023 5:41 PM
72	I agree with the proposal	3/15/2023 5:22 PM
73	No	3/15/2023 4:53 PM
74	great idea	3/15/2023 4:49 PM
75	It's unclear from description if they will retain their full license after the supposed possible public health event ends. Based on how the first part of the pandemic unravelled with many opticals closing down and many opticians out of work I don't see the need to have an emergency class for more opticians.	3/15/2023 4:29 PM
76	I think it's good idea.	3/15/2023 4:28 PM
77	I think its a good idea, if there is an emergency, this will allow Opticians to become registered in a quicker manner under the regulations.	3/15/2023 4:12 PM
78	In favour of registering additional opticians any time	3/15/2023 4:10 PM
79	Sounds ok	3/15/2023 4:07 PM
80	Feel based on what I witnessed during pandemic an emergency action plan is likely a good idea	3/15/2023 4:00 PM
81	In agreement with the proposal	3/15/2023 3:57 PM
82	Should apply to those registered for 2 years or more. Who cares. Help is help.	3/15/2023 3:55 PM
83	I do not think this is of any help to anyone. we already have enough Opticians and do not see why we need to being in less qualified people. would other health care collages do the same?	3/15/2023 3:55 PM
84	Great idea!	3/15/2023 3:48 PM
85	Agree	3/15/2023 3:28 PM
86	Good	3/15/2023 3:18 PM
87	Recalled opticians come out of retirement when there is emergency	3/15/2023 3:12 PM
88	This appears to have been thoroughly researched and reviewed. Retired/inactive opticians are extremely valuable and would certainly be able to contribute to the profession in the event of an emergency need.	3/15/2023 2:55 PM
89	Not a bad idea	3/15/2023 2:48 PM
90	I think that's a fair idea.	3/15/2023 2:41 PM
91	I am not sure , healthcare should be I. Safe hands! So, this doesn't make sense to me!	3/15/2023 2:38 PM
92	It would be very good for the public	3/15/2023 2:31 PM
93	It should be optional for any optician. Not mandatory.	3/15/2023 2:27 PM
94	as a community member, I believe it is conspicuously beneficial for the well being of the public in an emergency. I see it as a good stepping stone to consolidate our duty to serve.	3/15/2023 2:26 PM
95	I dont think we will need more opticians than what we have . Govt needs to just let opticals open in emergency	3/15/2023 2:20 PM

Registrant and Stakeholder Consultation - Temporary Emergency Class

96	I support the proposal. I would rather see previously qualified Opticians than unlicensed fill ins.	3/15/2023 2:19 PM
97	Is an emergency class really necessary?	2/14/2023 10:10 PM
98	I agree with the Ontario Government enacted bill 106.	2/2/2023 9:34 PM
99	Is there a need for this? In what situation would there be a need to for "emergency opticians"? Who will determine that they have "satisfactory standards" and what will this be based on?	2/2/2023 2:41 PM
100	sounds good.	2/2/2023 7:10 AM
101	we have to be concerned with outsiders from province coming to work in ontario after paying lower fees to colleges in other provinces, and that their qualifications meet that of ontario or similar	2/1/2023 5:18 PM
102	I have no problem in the event of an emergency to have this class of RO.	2/1/2023 4:23 PM
103	None	2/1/2023 2:04 PM
104	There are enough opticians to serve the public. I don't feel it necessary to reinstate non-practicing opticians. They do not have to keep up with any continuing education (which I personally don't find very useful myself). If an optician need's to practice, they should keep up with all prerequisites the rest of us need to as well.	2/1/2023 8:33 AM
105	It's one of the most ridiculous things I've ever heard. We've already had a full-blown pandemic and had no need of an emergency class of opticians. Just another way for COO to exhibit inflated self importance.	2/1/2023 12:01 AM
106	I know this took your team several hours to draft up. Well done.	1/31/2023 8:35 PM
107	None	1/31/2023 7:18 PM
108	I find it hard to believe that we will ever need to use this.	1/31/2023 6:53 PM
109	Na	1/31/2023 6:22 PM
110	Not a good idea! Not sure about the minutiae but can we expect people with substandard training from other countries to begin practicing in Ontario? Seems foolish and potentially costly in terms of quality of care. I'm sure some of the large multinationals will already be trying to find ways to use this to cut staffing costs.	1/31/2023 4:42 PM
111	Not necessary	1/31/2023 3:59 PM
112	I'm in agreement with the proposal. If anything Covid did, it was to demonstrate just how unprepared we ALL are in the case of an emergency.	1/31/2023 3:48 PM

Dear Fazal,

The Ontario Opticians Association, the official voice of Opticians in Ontario, is pleased to provide its feedback on the "Proposed Emergency Class of Registration" to the College of Opticians of Ontario

We are pleased to see that steps have been taken to have an Emergency Class of Registration in the event something like the last pandemic occurs. The OOA believes all Ontarians should have access to an optician when in need, no matter the situation.


The OOA does have a few points that it would like to bring to your attention on the proposed amendments.

- It does not specify if the applicant must have been a Registered Optician in the Province of Ontario.
- Will the applicant be expecting to pay registration fees? Will the fees be pro-rated?
- If after a certain period, a Temporary Emergency Optician decides to apply for a Registered Optician status, must they complete the Quality Assurance Program for the previous period spent as a Temporary Emergency Optician?
- Will there be an expedited process for applicants who are referred to PLAR and review of their previous employment?

Additionally, the OOA would like the COO to be made aware we never received a formal invitation for feedback on this matter. We would welcome the opportunity to be included in the future to comment on any amendments on behalf of Ontario Opticians as their Official Voice.

In conclusion, the Ontario Opticians Association would like to support the amendments but feels it needs further clarification and details within the documents. We are confident that such changes to the registration regulation can and will be beneficial to both the public and Ontario Opticians, but we do ask for clarification before giving it our full support.

Sincerely,



Martin Lebeau, RO
Executive Director
Ontario Opticians Association



April 14, 2023

Competition Bureau comments on the Creation of Emergency Class Certificate of Registration

Thank you for the invitation to comment on the creation of emergency classes of registration as required by Ontario Regulation 508/22 under the *Regulated Health Professions Act, 1991* (Amendments).

The Competition Bureau (Bureau), as an independent law enforcement agency, ensures that Canadians prosper in a competitive and innovative marketplace. As part of its mandate, the Bureau promotes and advocates for the benefits of competition.

Why competition matters

Ontario's health regulatory Colleges (Colleges) play a critical role in protecting the public by making sure healthcare professionals are safe, ethical and competent.¹ Pro-competitive policies can help to advance these goals, as described in our market study: [Empowering health care providers in the digital era](#). The study explained how policymakers can leverage technology to gain the benefits of competition including improved quality of care, access to care and fostering innovation and its adoption. Pro-competitive policies can have other benefits in healthcare, including contributing to the resilience of the workforce by lowering barriers to entry. As made evident by the COVID-19 pandemic, this is particularly important during emergencies, which can create additional shortages and pressures on healthcare workers.

The Bureau recommends that the Colleges create these emergency classes of registration to maximize the benefits of competition, such as increasing the supply of qualified healthcare workers, and advance their goal of protecting the public. Further, the lessons learned in the process may also be used to benefit competition and public safety during times of non-emergency.

Competition assessment in policymaking

The Bureau's [Competition Assessment Toolkit](#) was designed to assist policymakers in identifying competition issues and tailoring policies to maximize the benefits of competition. Once a policy is identified for assessment, the policymaker should consider whether it has the potential to restrict competition. This may be the case if it makes it difficult for businesses to emerge or compete, or for consumers to make informed choices or switch products or services.

The policymaker should then consider whether a feature in the policy that could restrict competition is necessary, narrowly cast and proportionate. If there is an alternative that

¹ Health Profession Regulators of Ontario (2023). [Professions and their Regulatory Bodies](#).



achieves their policy goal in a more competition friendly manner, they should implement it accordingly and monitor its effects moving forward for any unintended consequences.

Restrictions and alternatives

The various registration requirements set out by the Colleges for healthcare workers to practice are barriers to entry for future workers. Such barriers are intended to keep the public safe by ensuring that healthcare workers are ethical and competent to practice. During an emergency though, increased demand for healthcare services and strains on healthcare workers can result in labor shortages that may present their own risk to public safety.² Temporarily easing these registration requirements with an emergency class of registration (and thereby increasing or speeding up the entry of healthcare workers) can balance these risks.

By setting up the emergency class of registration to only be as restrictive as necessary during times of emergency, the Colleges can maximize the benefits of competition (i.e. a more resilient healthcare workforce and patient safety). The Amendments require the Colleges to establish registration requirements for individuals joining the emergency class. These requirements can be used to lower barriers to enter the profession. For example, by allowing for competent healthcare students, recent graduates or accredited workers from other jurisdictions to register and by exempting certain requirements for emergency class registrants to move to another class. To strike the right balance between the risks and benefits associated with temporarily lowering these barriers requires the medical expertise of the Colleges. The Bureau hopes that the framework of a competition analysis presented in the Competition Assessment Toolkit may be helpful in doing so.

The Bureau also encourages the Colleges to consider how pro-competitive policies can benefit patients and healthcare workers outside of times of emergency as well. The Amendments require the Colleges to specify a path for healthcare workers in the emergency class to move into other classes of practice and to be exempted from certain registration requirements in doing so. Such exemptions will lower barriers to entry for those workers on a more permanent basis. These lowered barriers are likely to result in faster entry and more licensed healthcare providers, and as a result, a more resilient workforce. As such, the competitive benefits of the emergency class certification extend outside of times of emergency. We encourage the Colleges to use their expertise to make these exemptions as broad as possible to maximize the benefits of competition, while still meeting the central health and safety objectives of registration requirements.

In making these decisions, as in performing any competition assessment, the Colleges should base their decision to the greatest extent possible on objective empirical evidence.³ To the extent data on the effects of similar exemptions in other jurisdictions or during the COVID-19 pandemic are available, this could inform their decision. It may also be beneficial to track data on worker entry and patient safety for healthcare workers operating under the emergency class provisions going forward. This data could be used to make future adjustments to the exemptions provided for under the emergency class, relaxing or

² Canadian Institute for Health Information (November 2022). [Health workforce in Canada: In focus \(including nurses and physicians\)](#).

³ Competition Bureau (2020). [Strengthening Canada's economy through pro-competitive policies](#). See Step 3: Identify alternatives to address policy goals, if necessary.



tightening them as needed.⁴ Perhaps more importantly, this same data could also be used to determine whether the regular registration requirements are as necessary, narrowly cast and proportionate as can be. Having identified how much these barriers to entry can be safely lowered to offset the risk of worker shortages during times of emergency, those lessons may be used to maximize the benefits of competition in ordinary times.

We're here to help

The Bureau's goal is to promote the benefits of competition across the Canadian economy. On the other end, policymakers, as subject matter experts and authorities, are in a unique and critical position to seize upon these benefits. By incorporating competition analysis into your policy assessment, you can maximize the benefits of competition while still achieving your policy goals.

Such competition analysis can be complex, but is worthwhile and the Bureau can help. If you would like to discuss the Competition Assessment Toolkit, or have questions about particular policy proposals or the suggestions above, please contact our Competition Promotion Branch.

Yours Truly,

Bradley Callaghan
Associate Deputy Commissioner
Competition Promotion Branch
Competition Bureau

⁴ *Ibid.* See Step 5: Conduct an ex-post assessment.