

February 30, 2009

The Hon. Doug Currie
Minister of Health
16 Garfield Street
Second Floor
PO Box 2000
Charlottetown, Prince Edward Island
C1A 7N8

Dear Minister Currie:

I am writing on behalf of the Canadian Association of Optometrists (CAO) in reference to your letter dated February 4, 2009 to Dr. William Scantlebury, President, Medical Society of Prince Edward Island.

The (CAO) represents 4,000 Doctors of Optometry in Canada. As the national voice of the profession we work closely on optometry's behalf with government, industry, vision care patients, the public at large and other health care professionals and organizations.

We wish to comment on your statement that "*It is not the intention of government to allow optometrists to prescribe eye steroids or glaucoma medication*". It is uncertain why this narrow approach is recommended when we were under the impression that the Ministry was intending to reflect the evolving standard in other provinces.

I am attaching the current summary of provincial legislation governing optometrists prescribing therapeutic pharmaceutical agents (TPAs). It contains updates in several jurisdictions including Nova Scotia, Ontario, Manitoba and British Columbia. As you will note, provisions for the use of steroids and glaucoma medications are more prevalent. A recent report (January 2009) by the HPRAC in Ontario is the most comprehensive review of optometrist's use of TPAs in recent years. It recommends that steroids and glaucoma medications be included in Ontario regulations. Also note that steroid use was added to legislation in Nova Scotia in December, 2007.

As we indicated in a letter to you on July 4, 2007, CAO's support for TPA legislation is based on several key rationales including:

- Approval of TPA legislation in Prince Edward Island is long overdue. Similar legislation has been in place in Canada since 1995 and in the United States since the late 1970s.
- Provisions for labor mobility, national examination standards and programs for internationally trained practitioners are significantly impacted by inconsistent provincial standards.

- Restricted legislation negatively impacts on the recruitment of optometrists to Prince Edward Island. This is contrary to what is required during a time of population growth, increased mobility and increasing demands and need for eye care.
- TPA legislation will increase access to timely and appropriate eye and vision care. This is particularly evident in rural settings in which access to ophthalmological care is limited, as well as in provinces where there are significant wait times for such care, as is the case in PEI. Transferring the treatment of some eye diseases from the care of physicians to optometrists will provide more physician time for other aspects of medical care and more ophthalmological time for surgery, emergency and specialty treatment
- TPA legislation will have the positive effect of enhancing collaboration between all related health care providers (e.g. family physicians, ophthalmologists and pharmacists). Provincial optometric regulatory authorities in PEI will ensure that appropriate guidelines are installed to enhance referral and consultative dialogue between practitioners for best patient outcomes.
- Our review of the PEIAO proposal indicates that the scope of practice proposed resembles TPA legislation currently in effect in North American jurisdictions. The experience has been positive in the U.S. and Canada. Reports from provincial licensing authorities indicate an absence of negative incidents regarding TPA use. Public safety is most reasonably assured.

The CAO encourages the Ministry to update legislation governing the scope of practice for optometrists in Prince Edward Island to include prescriptive authority for the full spectrum of drugs included in the PEIAO proposal. We thank you for the opportunity to comment on this important matter of public interest and trust it will assist you in your review of this matter. We shall be pleased to make ourselves available for further information or comment.

Yours truly,

Dr. Len Koltun
President CAO

Cc: Dr. Susan Judson, President, PEIAO
Dr. Richard Wedge, Director of Medical Programs