



AMERICAN ACADEMY
of OPTOMETRY

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May 13, 2010

Honourable Kevin Falcon, Minister
Health Services
Room 337, Parliament Buildings
Victoria, British Columbia V8V 1X4
Canada

Dear Minister Falcon:

As President of the American Academy of Optometry, I am writing on behalf of the Academy to express my concern regarding the recent proposal by the government of British Columbia to "modernize regulations for the sale of eyewear." For over eighty years, the American Academy of Optometry, an organization composed of optometrists, vision scientists, and optometric educators, has provided the profession of optometry with a venue for life-long learning opportunities that allows primary eye care practitioners to keep pace with the rapidly changing information needed to better serve our patients and thus to provide for the visual welfare of the public.

This education has contributed to the wealth of information that optometrists use in diagnosing eye disease, and equally important, the many systemic diseases that can manifest in the eyes. The standard-of-care for an eye examination conducted in Canada and the USA includes an evaluation of both the vision and ocular health of our patients. It is a well supported fact that having a simple "sight test," as proposed in your new regulations, will not assure by any measure that the person examined is free of eye disease or the side effects of underlying health conditions and/or the drugs used to treat those conditions.

The American Academy of Optometry has watched your proposed modernizing regulatory changes with significant concern. The proposed changes made to the regulations for opticians and optometrists under the Health Professions Act place patients at risk. The public will most certainly equate optometry or ophthalmology ocular examinations and "sight testing" as comparable. The "sight tests" that you propose are no more than measurements of the refractive error of the eye that ignore any form of ocular health evaluation. There are health conditions, diabetes being the most significant, which may influence refractive error. Other diseases such as cataract, glaucoma, corneal degenerations and dystrophies, degeneration of the macula, toxic ocular effects

of systemic drugs, and so forth, which if left undiagnosed, impact greatly the visual welfare of your age 19 – 64 citizens. Ignoring the health of the patient and the health of their eyes will surely result in devastating and in some cases irreversible vision loss.

Our organization echoes the sentiments that have been expressed by the leaders of the American Optometric Association and others in their recent letters to you. Your citizens do not deserve to have their vision or their health placed in jeopardy for the sake of making it easier to buy eyeglasses. As the Minister of Health, whose role it is to protect the health of the public, we urge you to reconsider enacting these regulatory changes.

Thank you for the opportunity for the Academy to provide comment on this very important healthcare decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark W. Eger, O.D., FAAO". The signature is stylized and cursive.

Mark W. Eger, O.D., FAAO
President, 2009 & 2010