

September 20, 2010

The Canadian  
Association of  
Optometrists



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Honourable Deb Mathews  
Ministry of Health and Long-Term Care  
Province of Ontario  
**HPRAC Consultations**  
56 Wellesley Street West, 12th Floor  
Toronto ON M5S 2S3

**Regarding: CAO Response to HPRAC Report on Inter-professional Collaboration  
Among Eye Care Professionals**

Dear Minister Mathews,

The Canadian Association of Optometrists (CAO) is pleased to provide its perspective pertaining to the recently released HPRAC report on '*Interprofessional Collaboration among Eye Care Health Professionals*'. ***The HPRAC report is well-timed and the notion of collaboration within the eye care industry is supported by the CAO.***

Collaboration in the eye care industry has been a challenge for some time. We are now faced with an aging population and a looming crisis in vision loss. A continued lack of collaboration and coordination in the eye care field will be detrimental to the sector's effectiveness to protect the public's eye health.

Ontario must be positioned with well trained eye care professionals in the coming decades to ensure the resources are sufficient to cope with the increased needs. ***For this reason, the CAO strongly encourages the Ontario government to implement recommendation #1 from the HPRAC report that calls for more clinical practicums to be created in Ontario for Optometric students.*** This is certainly in line with the direction that vision care needs to go and an excellent opportunity for interprofessional collaboration to take place.

The CAO is concerned with the lack of government support in enforcing the regulations it imposes upon the professions and trades. For instance, the recent Great Glasses court decision successfully defended the regulations; however, there was undue pressure placed on the resources of the Ontario College of Optometry to undertake that legal action. Currently there are internet sales of corrective eyewear taking place throughout Ontario without proof of a valid prescription. This is in conflict with provincial regulations. In our view, the government of Ontario must provide more support for enforcing its regulations as the Ontario College of Optometry should not be expected to carry this legal torch against out-of-province offenders. ***The CAO is supportive of HPRAC's recommendation #3 for the three regulatory colleges to work together to***

***address internet dispensing issues in Ontario. However, the CAO recommends that provincial government resources be made accessible to facilitate enforcement.***

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75% of vision loss is avoidable and the eye care professions and key stakeholders need to stand together to combat preventable vision loss. Poor vision is a substantial contributor to a poor quality of life. Additionally, vision loss has the highest healthcare costs of any disease. As primary care providers, Optometrists recognize that early detection and treatment of vision problems is critical to managing the increased risk of vision loss in the coming decades with the aging of the population. The mechanism for early diagnosis is a regular eye health examination that can often detect problems before the patients know they exist. It makes sense that a policy for regular preventive eye care is included in a vision health strategy.

It would not make sense to relax vision health standards at this time when extra vigilance is required. **The CAO applauds the HPRAC conclusion that refraction of the eye should not be disassociated from a comprehensive eye examination and endorses HPRAC recommendation #5.** The CAO fully expects to see negative consequences for vision health in British Columbia as a result of the confusion that will be created for the public and failure to recognize the importance for vision health. As noted, regular comprehensive eye examinations will be very important moving forward in the coming decades and the objective should be to increase the number of eye examinations.

Optometrists, as do other health professions, embrace the ideal of ‘patient first’. Canadian optometrists are bound by a mission, part of which is “...to fulfill the vision and eye care needs of the public through clinical care, research and education; all of which enhance the quality of life.” It is as necessary to remove the barriers to collaboration as much as it is necessary to instill trust across the professions that, as members of the vision health team, the patient must come first. This must be exemplified in training, professional creed, and standards of practice. For Optometrists, there is no compromise when ensuring that the management of patient needs is the highest priority.

As pointed out in HPRAC’s report, the conflict of interest regulations for optometrists are significant barriers to interprofessional collaboration and should be updated. It is clear that all stakeholders support greater collaboration in the public interest. Professional organizations oppose the regulations and the evidence suggests that preventing association with other eye care stakeholders is not in the public’s best interests.

The CAO encourages ethical behavior by all members of the Optometric profession and is supportive of the HPRAC suggestion that conflict of interest regulations should focus on individual behavior. However, there are legitimate concerns regarding the ability of an optometrist to control the five points noted by HPRAC when practicing in

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association in an employee relationship. Additional steps should be taken to require employers of optometrists to be bound by the regulations of the College of Optometrists when practicing in association. This will require the College to have the authority to implement measures to ensure employers comply with the requirements of optometric regulations. ***CAO supports the HPRAC recommendation #9 concerning conflict of interest with the condition that additional authority be provided to the regulatory College to ensure employers of optometrists do not interfere with compliance of optometric regulations.***

Ontarians should expect and deserve to have common standards from eye care professionals, and paraprofessionals on how to best manage their vision health. There needs to be collaboration on what these standards should be. The CAO is eager to work with Ontario, other provincial governments, Health Canada, and other industry professions and stakeholders to develop vision care standards. These standards are essential to manage the coming eye care crisis and are in the best interests of patients, professions, and stakeholders in the vision health industry. **CAO supports the HPRAC recommendation #12 to form an Ontario eye health council with this mandate at a provincial level.**

Vision health is critically important to Ontarians and Canadians. The road to better prevention and management of vision loss and blindness in Canada is through policies that reflect the importance Canadians have placed upon their vision. We can make a difference by ensuring the public is provided with the vision care standards that prescribe best practices and represent preventive health care. CAO strongly agrees with the HPRAC report that a national vision strategy is necessary to address the eye health needs of the future.

It is a CAO objective to raise the awareness of vision health with health care influencers and decision makers across this country. CAO is eager to participate wherever possible in cooperative measures to preserve and improve the excellent eye health care that Ontarians and Canadians enjoy and deserve. Thank you for this opportunity and we look forward to the next steps.

Sincerely,

Dr. Kirsten North, President  
Canadian Association of Optometrists

Glenn Campbell, Executive Director  
Canadian Association of Optometrists