

*The Canadian
Association of
Optometrists*



*L'Association
canadienne des
optométristes*

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April 28, 2010

Honourable Kevin Falcon
Minister of Health Services
Room 337, Parliament Buildings
Victoria, BC, V8V 1X4

Dear Minister Falcon:

RE: Proposed Amendments to Optometry and Optician Regulations

Dear Mr. Minister

The Canadian Association of Optometrists (CAO) represents over 4,000 optometrists in Canada. I am writing as CAO President to express our profession's deep concern with the amendments to optician and optometry regulations in British Columbia.

The government of British Columbia is proposing to re-write national and global health care standards. As Minister of Health Services, you are openly and publicly saying that any member of the public between 19 and 64 years of age with no eye health symptoms has no need of an eye health exam. You endorse this principle through changes in regulation that segregates an eye health assessment from "eyesight acuity". The government is also permitting B.C. consumers to self-prescribe for contact lenses and glasses prescriptions, when purchases are made on the Internet.

In the context of health policy generally, the logic would indicate that B.C. citizens between the ages of 19 and 64 should consider that there is no need for medical health assessments as long as there are no health symptoms. Furthermore, B.C. citizens should have the ability and be encouraged to self-prescribe when purchasing any health product including prescription drugs on the Internet.

Optometrists believe these proposals violate every principle of public health in place throughout the developed world. Every health profession and every government with responsibility for public health should be deeply concerned that 50 years of preventive health care effort will be erased with one stroke of the pen. Preventive health care means that patients are diagnosed and treated before there are symptoms and global standards and regulations of care reflect this important principle. The cost to society of treating symptomatic conditions is significantly higher than diagnosing and treating before there are symptoms. Our concerns are shared by many others including optometric and academic organizations, the Canadian National Institute for the Blind, Canadian Diabetes Association, B.C. Society of Eye Physicians and Surgeons and ophthalmic industry suppliers.

Never in the history of this profession have we witnessed such radical change with so little justification. The proposed amendments go far beyond the intention of responding to the Coastal Contacts court decision. Rather than 'resolve' the matter of sight testing, the regulation will escalate the debate and place international attention on the province well beyond May 1, 2010.

Asymptomatic Eye Disease

You have been misled to believe that the evidence shows that patients aged 19-64 do not have asymptomatic eye disease and that opticians are capable of referring high risk patients by way of a questionnaire. Where is the evidence and how has it been vetted by experts and stakeholders? This is NOT good health care policy and will lead to missed diagnosis and legal liability.

Coastal Contact Lenses

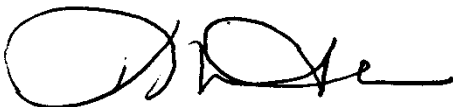
The proposed B.C. amendments will allow internet retailers to sell contact lenses and eyeglasses to consumers without regulation. This is contrary to recommended practice requiring the use of a valid prescription by a regulated dispenser. Valid prescriptions are often linked to frequency of eye exams and the need to assess eye health, especially for contact lens wearers. In the United States, the Fairness to Contact Lens Consumers Act requires internet contact lens retailers verify a valid prescription. Coastal Contacts already complies with these requirements. Health Canada uses a similar approach regulating the internet sales of prescription drugs.

Recommendation

The B.C. Health Professions Amendment Act created Advisory Panels under the Health Professions Review Board to review issues such as scope of practice. It is our understanding the panels were intended to provide an independent review of professional issues to guide ministerial action. We recommend that an Advisory Panel be formed to study the proposed regulations. CAO would be pleased to participate.

There is an opportunity to take leadership and refer the legitimate concerns expressed by stakeholders. I urge you to do so.

Yours truly,



Dr. Kirsten North, President
Canadian Association of Optometrists

cc: Premier Gordon Campbell
Mr. Daryl Beckett
Mr. Adrian Dix