

BRIEFING NOTE

TO: Board of Directors

FROM: Registration Committee

DATE: July 27, 2020

SUBJECT: 8.0 Amendments to Contact Lens Mentor Policy and Student/Intern Supervision Policy

☒ For Decision

☐ For Information

☐ Monitoring Report

Purpose:

To provide the Board of Directors with considerations for amendment of the criteria for student and intern supervision and for contact lens mentorship.

To provide the Board of Directors with considerations for granting a temporary Contact Lens Mentor Status to instructors from accredited opticianry programs.

Background:

The Student/Intern Supervision Policy and the Contact Lens Mentor Policy set out the guiding principles by which the College of Opticians of Ontario (the “College”) carries out its mandate on setting the minimum professional standards that an optician must meet in order to be eligible to supervise students and interns or act as a contact lens mentor. The current Student/Intern Supervision Policy and the Contact Lens Mentor Policy require that opticians who act as supervisors be registered with the College, in good standing, without terms, conditions or limitations on their certificate of registration and be actively and currently practising for a minimum of three (3) years. The Student/Intern Supervision Policy also allows individuals who acquired the necessary knowledge, skill and judgment in a period less than three years to be eligible for supervision of the eyeglass fittings of student and intern opticians.

Additionally, the Contact Lens Mentor policy requires registered opticians to be in a practical setting in order to qualify, thus precluding those holding full-time academic positions from qualifying. A concern has been raised by opticianry program coordinators regarding significant challenges faced by students in completing their contact lens fittings, particularly rigid gas permeable (RGP) fittings. This challenge has been exacerbated by the shortage of student placements for all types of fittings due to the COVID-19 pandemic.

For Consideration:

Recognition of Experience from other Canadian Jurisdictions

The Contact Lens Mentor and the Student/Intern Supervision policies currently exclude those registrants who, prior to their registration with the College, were registered as opticians in another Canadian jurisdiction(s) where opticianry is a regulated profession for at least three years. Recognizing their previous registration with other opticianry regulators not only aligns with the College’s notion of fair and inclusive practice, but also allows to expand the roster of student and

intern supervisors and contact lens mentors.

The Registration Committee approved recommendations for amendment to the current Contact Lens Mentor and Student/Intern Supervision Policies on March 23, 2020 and July 20, 2020 respectively to include a provision for applicants who were registered as an optician in another Canadian jurisdiction where opticianry is a regulated profession for a minimum of three years or hold a combination of registration in the COO and an equivalent College regulating opticianry in another Canadian jurisdiction for a minimum of three years.

The addition of “as a Registered Optician” in the first part is meant to exclude other classes of registration, such as Registered Student Optician or Registered Intern Optician, and to clarify that registrants must have been a Registered Optician for the entire qualifying period of three years. The Contact Lens Mentor Policy also clarifies that the prior period of registration must have included the authority to dispense contact lenses, as certain Canadian jurisdictions offer an “eyeglass only” license.

Temporary Contact Lens Mentor Status for Academic

In light of the concerns identified by program coordinators about student access to Contact Lens Mentors, the Committee is recommending the adoption of an addendum to the Contact Lens Mentor Policy that will grant temporary Contact Lens Mentor status to opticianry faculty that teach Contact Lens courses in an academic setting. If approved, this temporary status would remain in effect until December 31, 2020, at which time the Committee can re-assess the situation.

Alignment between the Policies and updating Terminology

To keep the Student/Intern Supervision Policy and the Contact Lens Mentor Policy in alignment, at its meeting on July 20, 2020, the Registration Committee approved recommendations for further change to criterion two of the Contact Lens Mentor Policy to allow individuals who acquired the necessary knowledge, skill and judgment in a period less than three years to be eligible for supervision of the contact lens fittings of student and intern opticians.

Lastly, the term “member” has been replaced with the term “registrant” throughout both policies to reflect new terminology approved by the Board on February 26, 2020.

Recommendations/Action Required:

The Registration Committee makes the following recommendations:

1. That the Board approve the proposed amendments to the Student/Intern Supervision Policy
2. That the Board approve the proposed amendments to the Contact Lens Mentor Policy
3. That the Board approve the Addendum to the Contact Lens Mentor Policy to grant temporary status to instructors from accredited opticianry programs.

REGISTRATION POLICY

Student and Intern Supervision

The College of Opticians of Ontario (the College) is committed to supporting registered opticians who provide on-site education to opticianry students and interns. The College strongly encourages registered opticians to participate in the preparation of students and interns studying opticianry. The education and training of opticians requires learning in both the classroom and in the practice setting. While the classroom training is provided within approved opticianry education programs, students and interns receive clinical training from registered opticians.

Guiding Principles

These guiding principles apply, with necessary modifications, whether the individual being supervised is a registrant of the College or not.

Student and intern opticians are permitted to perform all aspects of the controlled act of dispensing eyewear under the supervision of a registered optician. The tasks in dispensing eyewear are not delegated to students or interns. Registered opticians who supervise students and interns are responsible for all patient services provided by the student or intern and are expected to adhere to the supervision requirements set out in this policy. The supervising optician accepts and maintains primary responsibility for the student or intern whom they supervise. Under no circumstances should an optician permit a student or intern to dispense in the absence of the optician. The supervising optician accepts responsibility for judging the knowledge, skills and abilities of the students and interns under their supervision prior to assigning patient care responsibilities.

Optician Responsibilities

Opticians who supervise students or interns function as clinical educators. The supervising optician and the student or intern should meet to jointly formulate clear, objective and measurable goals to be used in the evaluation process, prior to the student or intern providing clinical services. The goals should be measured using a schedule to be determined jointly by the supervisor and the student or intern. The supervising optician shall also:

1. Be registered with the College, in good standing, without terms, conditions or limitations on their certificate of registration;
2. Be actively and currently practising for a minimum of three (3) years within the last five years or have fitted a minimum of 750 eyeglasses within the last five years **in Ontario or in another Canadian jurisdiction where opticianry is a regulated profession**. Registrants, who wish to supervise the contact lens fittings of student or intern opticians, must also meet the requirements of the College's Contact Lens Mentor policy.
3. Provide the College with the names of all students and interns they are supervising;

4. Be comfortable assessing their own skills and abilities as well as evaluating the skills and abilities of others and should agree to act as a clinical educator only in areas of clinical practice where they are competent;
5. Be familiar with students' and interns' learning objectives and with their curricula, including course content, program philosophy and expectations;
6. Orient the student or intern to the facility (including equipment, protocols and documentation requirements) and to the specific conditions, needs and/or goals of individual patients;
7. Ensure an individual who they are supervising is registered and in good standing with the College as a student optician or intern optician or, if the student is not registered with the College, ensure that they are enrolled in an approved educational institution and fulfilling the requirements to become a registrant of the College and the act being performed is within the scope of practice of the profession and is done under the supervision or direction of the supervising optician.
8. Ensure that duties assigned are appropriate to the student or intern's level of education, ability, experience, comfort level and learning style, as well as the complexity of the environment/practice setting;
9. Provide feedback to the student or intern regarding performance on a consistent, timely basis, based on the criteria established by the respective opticianry educational program;
10. Have the right to refuse to supervise or to discontinue supervising a student or intern when the supervising optician, in the best interests of the public, deems such action to be necessary and appropriate.

Determining the Amount of Supervision Required

1. The supervising optician must always directly supervise a student's or intern's patient contact. Direct supervision means that a registrant must be on-site, able to intervene, and available to provide in-view observation, formal feedback and guidance while a student or intern performs a controlled act.
2. The amount of supervision a student or intern will need will depend on the type of task assigned and the overall competence of the student or intern.

Identification

To avoid confusion or misrepresentation, registered opticians, and registered students and interns must wear their College issued photo identification badge in compliance with the Registration Regulation. Students who are not registered must wear a photo identification badge issued by the educational institution while working in a practice setting. The badge issued by the educational institution must include the name and a photograph of the student, the name of the educational institution and the current valid year.

Complaints

Student and intern opticians who are registered with the College are registrants of the College. Accordingly, complaints regarding the actions or conduct of student and intern opticians will be handled in compliance with the complaints provisions of the Regulated Health Professions Act, 1991 and the policies of the College. Dependent upon the circumstances, complaints regarding the actions or conduct of students (registered with the College or not) or interns could also result in an investigation of the supervising optician.

For More Information

Students, interns and opticians with questions about supervision should contact the College.

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Contact Lens Fittings Requirements

It is a requirement under Section 5 (2) 3. of Ontario Regulation 869/93, that an applicant for a certificate of registration as a Registered Optician must have,

“... completed, and must present evidence of, at least twenty contact lens fittings, including at least five rigid gas permeable (RGP) contact lens fittings, under the supervision or direction of an optician who is certified in the fitting of contact lenses or an optometrist or an ophthalmologist.”

Supervision of Contact Lens Fittings and Signing of Logbooks

All registered opticians, who wish to supervise the contact lens fittings of student or intern opticians and sign the student or intern logbook, must be recognized by the College as a Contact Lens Mentor for either “soft” or “soft and rigid” fits.

Eligibility Criteria for Contact Lens Mentor Status

A Registered Optician who wishes to be recognized as a Contact Lens Mentor by the College must submit the appropriate application to the College, which confirms that s/he meets the following criteria, as set out by the Registration Committee:

1. Is a ~~member registrant~~ in good standing with the College;

~~Has been registered with the College for a minimum of three years;~~

2. Currently works in a practice which includes the dispensing of contact lenses as part of the services offered to the public.; and

3. Demonstrates experience as a Registered Optician, as follows:

- a. Has been registered as a Registered Optician for a minimum of three years with the authority to dispense contact lenses in Ontario and/or in another Canadian jurisdiction where opticianry is a regulated profession; OR

- b. Has fitted the minimum number of contact lenses in the previous three years, as follows:

- i. In order to supervise soft contact lens fits: a minimum of 50 soft contact lenses (including 40 spherical and 10 non-spherical [toric or multifocal])

- ii. In order to supervise soft and rigid contact lens fits: has fitted a minimum of 50 soft contact lenses as described above and a minimum of 15 rigid contact lenses (including spherical and complex designs).
- 4. ~~In order to supervise soft contact lens fits: has fitted a minimum of 50 soft contact lenses (including 40 spherical and 10 non-spherical [toric or multifocal]) in the previous three years, OR~~
- 5. ~~In order to supervise soft and rigid contact lens fits: has fitted a minimum of 50 soft contact lenses as described above and a minimum of 15 rigid contact lenses (including spherical and complex designs) in the previous three years.~~

A ~~member registrant~~ who is approved by the College as a Contact Lens Mentor must agree to the following:

1. That ~~his/her~~ **their** name be added to an official registry of Contact Lens Mentors for the purpose of supervising student or intern opticians who wish to obtain contact lens fittings;
2. Permit the College to inspect contact lens files for verification of required fittings; and
3. Not charge a fee to sign logbooks or supervise student or intern opticians.

Registered opticians may only begin supervising contact lens fits and signing student or intern logbooks after receiving confirmation from the College that ~~his/her~~ **their** Contact Lens Mentor status has been approved. A letter will be provided by the College certifying the Contact Lens Mentor status.

Registered Opticians who are considered “soft Contact Lens Mentors” may *only* supervise and verify soft contact lens fits. Registered Opticians who are considered “soft and rigid Contact Lens Mentors” may supervise and verify *both* soft and rigid fits.

The Contact Lens Mentor status is valid for a period of three years from the date of approval. Registered Opticians are required to re-apply after three years in order to continue signing student logbooks.

The College is committed to adhering to the principles set out in the Ontario Human Rights Code. Registered Opticians who wish to be recognized as a Contact Lens Mentor may contact the College directly to request accommodation with respect to the criteria set out in this Policy.

Temporary Addendum to the Contact Lens Mentor Policy

From July 27, 2020 to December 31, 2020, the Registration Committee waives criterion #2 for eligibility to act as a Contact Lens Mentor (that the Registered Optician currently work in a practice which includes the dispensing of contact lenses as part of the services offered to the public) where the Registered Optician:

1. Is currently employed as an instructor in an opticianry program at an educational institute that has been accredited by the College.
2. Teaches one or more courses relating to contact lenses.
3. Meets all other requirements set out in the Contact Lens Mentor Policy

Any Registered Optician who is approved as a Contact Lens Mentor in accordance with this addendum will be granted Contact Lens Mentor status until no later than December 31, 2020. Registered Opticians wishing to continue as a Contact Lens Mentor beyond December 31, 2020 must re-apply at that time and their application will be considered in accordance with the eligibility criteria that are in place at that time.