

BRIEFING NOTE

TO: The Board of Directors

FROM: Clinical Practice Committee

DATE: October 2, 2023

SUBJECT: 9.0 Standard 8: Refraction & the Refraction Designation

For Decision

For Information

Monitoring Report

Purpose:

To determine whether Standard 8: Refraction and the refraction designation should be eliminated.

Background:

Refraction, sometimes referred to as a sight test, is a test which determines whether corrective lenses are required and, what the power of these lenses should be, if required. Eyewear cannot be prepared and/or dispensed based on refraction alone. Refraction is not considered a controlled act under the *Regulated Health Professions Act (RHPA)*.

A prescription is the result of an eye examination consisting of a refraction and an eye health examination (to detect any conditions or diseases) performed by an authorized prescriber. Prescribing and communicating a diagnosis is a controlled act.

The College is continually looking at ways to align the Standards of Practice with changing practice environments. With a growing number of opticians working in shared practice environments with prescribers, registrants need to have a clear understanding of their responsibilities related to refraction.

The Standards of Practice contain 2 standards which address refraction:

Standard 8: Refraction aims to separate the performance of the public domain of refraction from the controlled act of prescribing. This Standard applies to 40 opticians who hold “refracting designation”.

Standard 10: Delegation addresses the giving and receiving of delegation by opticians. This standard addresses the performance of refraction by opticians (with or without refracting designation) under the delegation or assignment of an authorized prescriber, as part of pre-testing.

To better understand how and when opticians were refracting and, the continued relevance of Standard 8, the College engaged in stakeholder consultation during 2022. The Clinical Practice Committee was of the view that no compelling public interest rationale was identified to support the continued recognition of the refraction designation and/or the need for Standard 8.

As a result, the Committee made recommendations to the Board of Directors that Standard 8 and the refraction designation be eliminated and, prior to making a final decision, the College engage in additional stakeholder consultation to better understand how this would affect registrants.

For Consideration:

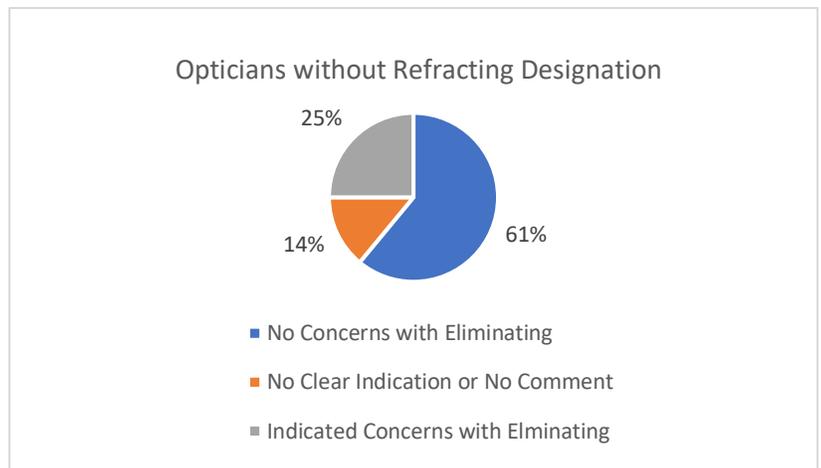
The proposal to eliminate Standard 8 and the refraction designation was circulated for stakeholder feedback from June 19 – August 18, 2023, together with an explanatory document and the Standards of Practice. A survey inviting comments was shared via eblast and social media.

Findings

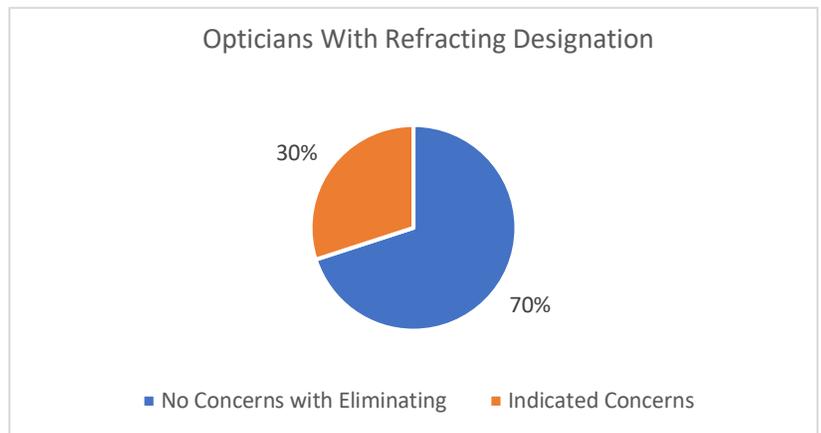
A total of 119 comments were received by the College:

- 109 from opticians without refracting designation (Appendix A)
- 10 from opticians with refracting designation (Appendix B)

Based on the comments received, 62% of opticians without refracting designation were in favour of or indicated a positive opinion about eliminating the standard and/or the refraction designation, 27% were not in favour or indicated a negative opinion and 11% did not clearly indicate an opinion or had no comment.



Of the comments received from opticians with refracting designation, 70% were in favour of, or indicated a positive opinion about eliminating the standard and/or the refracting designation, 30% were not in favour or indicated a negative opinion.



In addition, the College received feedback from 2 registered opticians via email (Appendix C). Comments include:

- Any optician who fits specialized lenses should have refraction training
- It is unjustified and irresponsible to cancel the refraction designation (opticians put effort, time, and money into obtaining the education)
- Refracting Opticians should be identified appropriately and able to refer patients to medical doctors and optometrists.
- It is wrong to assume all opticians could accept delegation as many do not work in shared practices with an optometrist or medical doctor

Registrant Concerns Identified

Amongst those who indicated a negative opinion about eliminating Standard 8 and the refracting designation, several key themes were identified. These themes are summarized in the table below. In addition administrative staff provided

| Concern | # ROs who expressed this concern | Background Information to Consider |
|--|----------------------------------|--|
| The elimination of the standard and designation may remove and/or reduce the chance of future scope expansion | 6 | <ul style="list-style-type: none"> - The Ministry of Health and Long-Term Care ordered the COO to immediately cease granting refraction status to its registrants in 2009. This administrative hold remains in place today. - No optician, including those who currently hold a refraction designation is permitted to dispense from the results of a refraction without a valid prescription. - Any future hypothetical scope expansion would depend on opticians' knowledge and skill and would not be tied to a specific designation. <p>Refraction has been added to the entry-to practice competencies and is now taught as part of all accredited education programs.</p> |
| Having refraction knowledge aids in dispensing and/or trouble shooting; eliminating the standard and/or delegation may result in opticians not gaining that knowledge. | 6 | <ul style="list-style-type: none"> -As of 2021, refraction is taught in Opticianry programs at all accredited schools. -All opticians are currently permitted to refract under delegation or assignment. -A refraction designation is not needed in order for opticians to use refraction skills/knowledge for troubleshooting (e.g. manifest over refractions when fitting eyeglasses or contact lenses) |

| | | |
|--|---|--|
| Removing the designation may have a negative impact on business | 3 | -Opticians (including those with refracting designations) are not able to dispense glasses and/or contact lenses from the results of a refraction. -Opticians may identify refraction as an 'area of practice' on the public register and/or in advertisements or signage relating to their practice. |
| Schools (e.g. NAIT) will no longer have an incentive to offer advanced certificates/continuing education programs in refraction and/or opticians will no longer have an incentive to expand/improve their skills and knowledge | 2 | -Various programs continue to offer certificates or continuing education program/courses in refraction. -As of 2021, refraction is taught as part of the entry-to-practice requirements in opticianry programs at all accredited schools. -All opticians are permitted to refract under assignment/delegation, provided they have the requisite skills or knowledge. One of the ways that opticians can gain the requisite skills/knowledge is to enroll in additional courses/programs. |
| There is a need for additional continuing education related to refraction. | 2 | -The professional portfolio allows for opticians to select their continuing education based on their needs. -The College will be working with CE providers to assess and improve the availability of resources for opticians on refraction |

Feedback from Associations

The Ontario Opticians Association (OOA) and the Opticians Association of Canada (OAC) submitted letters in response to the proposal (Appendix D and E respectively). Both associations indicated they are opposed to the removal of Standard 8.

In the OOA's view:

- It is advantageous for opticians to distinguish themselves if they possess higher education
- It is essential that individuals seeking eye care services can easily identify the education and expertise of the practitioner
- Standard 8 is impractical and nearly unattainable. A revision to align it with the contemporary expectations and requirements is needed

In the OAC's view eliminating the standard/designation:

- Is a disadvantage to opticians who have invested time and resources into their education to identify they have the education, expertise, and competency in this area.

- Creates uncertainty for career progression and negatively impact optician training programs
- May potentially result in the need to lobby for new legislation to regain the autonomy opticians had under the refracting designation

The following chart outlines some areas the Clinical Practice Committee considered with respect to eliminating Standard 8 and the refraction designation.

| Eliminating Standard 8 and the refraction designation would: | Eliminating Standard 8 and the refraction designation would not: |
|--|--|
| Streamline/modernize the Standards and provide greater clarity for registrants. | Reduce access to care; opticians cannot dispense from the results of a refraction. |
| Reduce confusion registrants may have on where to seek guidance on refraction in the Standards of Practice. | Prohibit an optician from indicating they have a skill set – areas of practice can be indicated on renewal form and are searchable in the public register. |
| Reduce public confusion between refracting and prescribing. | Prohibit a registrant from completing a manifest over refraction (MOR) when fitting eyeglasses and/or contact lenses. |
| Eliminate the confusion between refraction and prescribing. | Prohibit a registrant from compensating a prescription for vertex distance or working distance. |
| Eliminate the paperwork/reporting requirements which were previously identified as a barrier by participants of the focus group. | Eliminate the opportunity for opticians to expand their knowledge. |

Public Interest Considerations:

The Committee was of the view that no compelling public interest rationale was identified to that would preclude Standard 8 and the refraction designation from being eliminated. Conversely, consultations carried out in 2022 identified confusion amongst patients on the difference between refracting and prescribing and the existence of two standards on refracting.

Diversity, Equity, and Inclusion Considerations:

Updating the standard of practice to be consistent with today's practice environment may result in increased access to eye care services.

Recommendations/Action Required:

The Clinical Practice Committee recommends that the Board approve eliminating Standard 8: Refraction and the refraction designation.

Q1 Please indicate if you are a :

Answered: 171 Skipped: 0

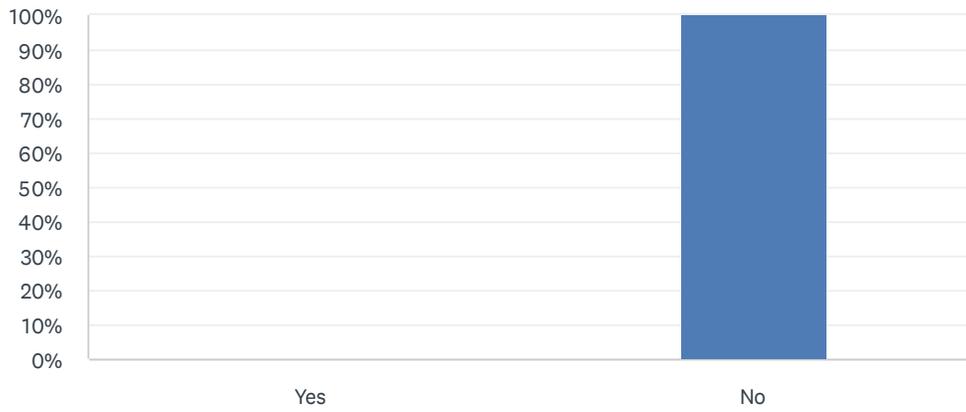


| ANSWER CHOICES | RESPONSES | |
|---|-----------|------------|
| Registered Optician | 100.00% | 171 |
| Registered Student or Intern Optician | 0.00% | 0 |
| Member of the public | 0.00% | 0 |
| Representative of another regulatory body | 0.00% | 0 |
| Other (please specify) | 0.00% | 0 |
| TOTAL | | 171 |

| # | OTHER (PLEASE SPECIFY) | DATE |
|---|-------------------------|------|
| | There are no responses. | |

Q2 Do you have refracting designation?

Answered: 171 Skipped: 0



| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 0.00% | 0 |
| No | 100.00% | 171 |
| TOTAL | | 171 |

Q3 If yes, will eliminating Standard 8 impact you negatively, and, if so how?

Answered: 0 Skipped: 171

| # | RESPONSES | DATE |
|---|-------------------------|------|
| | There are no responses. | |

Q4 Please provide any comments or feedback on the proposal to eliminate Standard 8 and the Refracting Designation.

Answered: 109 Skipped: 62

| # | RESPONSES | DATE |
|----|---|--------------------|
| 1 | the 40 opticians who can refract for the patients can still refract but it is no longer a requirement in the continue education. | 8/20/2023 12:26 AM |
| 2 | Agreed | 8/18/2023 10:42 PM |
| 3 | Standard 8 & all ref. should be eliminated. because Govt. and Insurance companies DO NOT COVER Sight Test or Refraction performed by opticians anywhere in Canada including BC. Talk to opticians refractionists n BC | 8/18/2023 4:23 PM |
| 4 | I THINK IT IS TIME THAT OUR ORGANIZATIONS COME INTO THE 21 CENTURY. OPTICIONS WITH PROPER EXPERTISE AND EDUCATION SHOUL BE ALOUD TO REFRACT. ISN'T THAT THE WAY OPTOMETRIST STARTED WAY BACK? ALSO A LOT OF OPTOMETRISTS ARE CONCERNED MORE AND MORE ABOUT PATHOLOGY. | 8/18/2023 1:45 PM |
| 5 | In Ontario, not allowed to do the refraction. So eliminate don't make anything. | 8/18/2023 10:18 AM |
| 6 | I am not in favor of the removal of Standard 8, which was recently added to the COO Standards of Practice (2020) with the aim for opticians to obtain in near future a refracting designation. The proposed change on delegation would be discriminatory as it will limit the possibility of practicing refraction to only the opticians who work in optometric clinics and the possibility for all other opticians and future opticians to further their education in refracting and aim to obtain a stand alone refracting delegation. Standard 8 should be revised and take into consideration the role of the opticians in the future of tele-optometry in Canada as it is gaining ground and is approved in so many states in the USA. We should start by discussing with all stakeholders the role of a refracting optician from this perspective when the optician may be performing remotely refraction (with the optometrist not present on site). Standard 10 only details the delegation by the optician, there is no criteria to detail delegation to an optician and what that will entail therefore Standard 10 should be also revised. | 8/17/2023 10:11 PM |
| 7 | I think it is important for Optician who are practicing refraction stay current in their skills. However, I believe that the Opticians with this designation should choose to do continuing education that best suits their skill set or areas which they would like to develop. I am in favour of removing the additional requirements for these individuals. | 8/15/2023 11:00 PM |
| 8 | Standard 8 is redundant | 8/15/2023 5:04 PM |
| 9 | Make sense since it's always under the supervision of an optometrist or ophthalmologist. It makes it more appealing for other opticians to want to have this specialization acquired since it becomes a lighter practice. | 8/15/2023 3:37 PM |
| 10 | I feel that the elimination of Standard 8 would definitely simplify things, but at the same time I feel that those opticians who have done the extra work to qualify as refracting opticians should still be recognized. | 8/15/2023 1:36 PM |
| 11 | Disagree that it should be revoked. Limiting how opticians can work in the future is a detriment. | 8/15/2023 1:32 PM |
| 12 | I am in favour of the scope of practice being modernized and agree with the College with the new standard 10. | 8/15/2023 12:49 PM |
| 13 | It shouldn't be done but also I would like the regulated body to look into online eyeglasses dispensing.if I order something on Amazon.com (USA) I get a message stating no shipping to Canada surely th COO can work on this to ban no eyeglasses shipping to Canada as here you are regulating us when we are in a brick and mortar store but on the other hand you allowing eyeglasses dispense online without a regulating body how much of double standard can we endure | 8/15/2023 12:12 PM |
| 14 | Standard 8 should be revised, not eliminated. | 8/15/2023 11:22 AM |

Registrant Consultation: Eliminating Standard 8

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| 15 | Agree | 8/15/2023 11:18 AM |
| 16 | Good Idea | 8/15/2023 10:34 AM |
| 17 | Leave refraction to professionals | 8/15/2023 9:56 AM |
| 18 | I STRONGLY disagree with being an optician can do refraction! | 8/15/2023 9:47 AM |
| 19 | Standard 8 is redundant and should be eliminated but the Refracting title or designation should be kept as a basis of an added level of qualification. | 8/15/2023 9:01 AM |
| 20 | The COO should not remove Standard 8. The Standard should be updated to reflect current and future scenarios where opticians are providing refractions with oversight of an optometrist or physician who is not physically present. With remote refraction technology playing an increasing role, it is important that opticians can service the public with refractions using technology. Having a designation of "Refracting Optician" for opticians who have attained specialized training will give the public and other eye care professionals confidence. | 8/15/2023 7:28 AM |
| 21 | What holds for the future for other optician who needs to be or in a situation where they can be refracting and helping the community under standard 10 | 8/15/2023 6:48 AM |
| 22 | No comment | 8/15/2023 6:39 AM |
| 23 | I still don't completely understand why standard 8 needs to be eliminated. | 8/15/2023 1:06 AM |
| 24 | Eliminating Standard 8 means Refracting Opticians cannot independently do refracting anymore. We must work under delegation of a legal prescriber. Don't you think this is a pity for refracting opticians. The years' duration of your OOA that was spent to fight for independent refracting by all opticians in vain. Is this ridiculous? | 8/14/2023 11:40 PM |
| 25 | Opticians are better served under Standard 10 | 8/14/2023 11:18 PM |
| 26 | I agree with the elimination of Standard 8 as it does not accurately reflect the reality of eye care today. Enhanced refracting skills are desperately needed by opticians in day to day practice. Whether over-refracting while fitting RGPs, sclerals, ortho-k, multifocals, determining the correct power of OTC readers or simply verifying the effectiveness of a pair of eyeglasses or the working distance of computer glasses. However, refracting as a service that would be authorized and delegated separate from an eye exam is not likely to be called for by any prescriber. Refracting and over-refracting are already natural components of an opticians scope of practice and are tools used to aid in dispensing. So, there should be no special registration required. Any standard on refracting should reflect the true reality of opticians current and future practice. | 8/14/2023 10:05 PM |
| 27 | The refraction designation should not be eliminated as this designation may be useful in the future. As government health dollars are stretched, ophthalmologists & optometrists May find it useful to have a refracting optician in the office to help lessen the workload. | 8/14/2023 9:12 PM |
| 28 | The refracting designation is not being used by those who have it. There are thousands of Opticians that can benefit from the removal and can expand our scope of practice by working along side other optical professionals. Opticians Association has been run by Lorne for years and does not hide the fact he wants people to go out and take a refracting course, Opticians Association does not speak for most Opticians anymore, unfortunately... | 8/14/2023 9:03 PM |
| 29 | I think this is a great standard of care and collaboration between optometrists and opticians. We really need to build a stronger relationship with them. I think this is great. | 8/14/2023 9:00 PM |
| 30 | As long as an optician has the knowledge and skills to perform the refraction under the supervision of an OD or a MD, eliminating standard 8 and the Refracting Designation will allow for more Opticians to perform refraction. | 8/14/2023 8:54 PM |
| 31 | Not really | 8/14/2023 8:46 PM |
| 32 | I think eliminating it will take our profession backwards. Optometrists and Pharmacists can now prescribe medications, why can't opticians be trained to do simple sight tests. We should be working to advance our profession. Opticians should be part of the first line in eyecare. Patients that delay getting eye exams because of the cost, would benefit with simple eye tests that could detect problems. | 8/14/2023 8:40 PM |
| 33 | Instead of eliminating Refracting Designation for Opticians it should open Refracting course for Opticians in Ontario . Give Opticians opportunities to help public and reduced the work load for | 8/14/2023 8:23 PM |

Registrant Consultation: Eliminating Standard 8

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| | optometrist. | |
| 34 | I don't think that a current designation should be removed. I think that any Optician that completes a recognized Refraction course should be assigned this designation. | 8/13/2023 3:23 PM |
| 35 | Opticians with the Refracting Designation should be grand-father cloused and eliminate the Standard 8 regulation. | 8/13/2023 12:20 PM |
| 36 | I don't approve to eliminate standard 8 and the Refracting Designation. | 8/12/2023 3:08 PM |
| 37 | A 100 % agree on reducing the 8 cme hours ,every year ,I have to worry about doing them ,practicing at work with customers and patients is our goal to help communities, cme won't. | 8/11/2023 10:04 PM |
| 38 | I am in agreement with eliminating standard 8. | 8/11/2023 7:29 PM |
| 39 | I fully recommend that standard 8 policy should be maintained and reviewed gradually as eyecare advances. A time is coming when opticians will be needed to get involve actively in refraction due to shortage of optometrist. There is a room for practice improvement in all disciplines. Eliminating standard 8, means we are removing the chances or opportunity of expanding scope of practice for opticians in the near future. In conclusion, standard 8 should be maintained and reviewed. Also, a continous public awareness campaign should be set up to enlighten the public ,so as to eliminate the confusion and disparity. If standard 8 is eliminated, the need and interest for refraction program by NAIT will be defeated. I surpose to take the refraction program in in August 2023, based on this proposal, I might have to step down, as the need and future goal is eliminated. I stand with others,that standard 8 policy should stay and maintained. Thank you. | 8/11/2023 4:32 PM |
| 40 | Those Opticians that hold Refraction designation should be able to do so until retired. When the last one retires then remove standard 8. You should not be able to just eliminate something that these Opticians worked for. | 8/11/2023 4:10 PM |
| 41 | What is the benefit to opticians with refracting status? They need to work collaboratively with an optometrist or doctor to get a prescription as a result of the refraction. Are those who have the status using it and, if so are they following the rules or are they making glasses from the results without any involvement from a doctor? It seems this would be more of a cause for concern than if they worked under delegation or assignment of a doctor. | 8/11/2023 2:00 PM |
| 42 | Yes, it should be eliminated and with proper training and educated opticians should be able to do refraction. | 8/8/2023 10:30 PM |
| 43 | When a designation is given because all criteria have been completed, it should stand. When new data or changes evolve &/should be added to the existing designation, when possible. | 8/4/2023 7:47 AM |
| 44 | I think this is a good step. Reduces confusion as well as helping to ensure the Colleges SOP are adhered to. Good job! | 7/27/2023 8:52 PM |
| 45 | As Opticians I feel we should focus on professionally dispensing glasses and contact lenses to the public. We fought hard back in the early 90's to become a College and stay licensed. If one wishes to be in a different College then returning to school may be in their future. | 7/24/2023 9:48 PM |
| 46 | Yes, it should be eliminated. | 7/6/2023 2:08 PM |
| 47 | Agree | 6/28/2023 11:03 PM |
| 48 | Remaining refract and MOR but not prescribing. Optician should also have the right to adjust the prescription from the doctor in some practical situation if needed and after the adjustment of the prescription for the patient, if the patient is feeling comfortable and clearer vision, the adusted new prescription is still allowable for insurrance claim. The opticianary program could also add some basic refracting skills to adjust the patient's simple Rx if the patient doesn't want to go back to the doctor's office the recheck. Complicated Rx or with prism could send back to the doctor if the patient does not seeing well. | 6/27/2023 7:09 PM |
| 49 | I believe streamlining this process will help greatly to reduce confusion within the membership and, by extension and simple osmosis, our patients. | 6/27/2023 4:28 PM |
| 50 | Standard 8 is restrictive and Standard 10 seems to cover refraction. I don't think the designation is important as they can't do anything with the refraction; a doctor has to write a prescription. | 6/27/2023 12:09 PM |
| 51 | Eliminate Standard 8 | 6/26/2023 10:41 PM |

Registrant Consultation: Eliminating Standard 8

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|----|---|--------------------|
| 52 | You should because they work mostly under ophthalmologist and refract better than most optometrists. | 6/23/2023 2:10 PM |
| 53 | It does not appear that eliminating Standard 8 has any negative effect on either opticians or the public. If I understand correctly, all opticians are able to refract under the delegation of an optometrist. Opticians cannot make glasses or fit contacts with the results of the refraction, eliminating standard 8 is not taking away resources for patients. | 6/23/2023 1:36 PM |
| 54 | All contact lens Opticians who fit difficult patients do an over refraction. As Optometry refuse to add a BCVA to their prescription it behoves opticians to check if this RX is OK and what VA to expect. Do we care about eye dominance ? Should we ? Is this part of a deal between the provincial government and Optometry ? Should Optometry dispense glasses ? (conflict of interest) The only reason there are only 40 refracting opticians is because it was not encouraged by the College. I was involved in the initial discussions when Opticianry was included in the health regulations, we were regulated only because of the fitting of contact lenses, which require an over-refraction. Teaching refraction is important to this aspect. | 6/23/2023 11:00 AM |
| 55 | I am not against eliminating Standard 8. I believe it's in the best interests of all opticians to do so. | 6/22/2023 6:32 PM |
| 56 | It is time to eliminate standard 8 and the refracting designation. | 6/22/2023 6:18 AM |
| 57 | Qualified opticians should be allowed to refract under the supervision of an optometrist or ophthalmologist. | 6/22/2023 12:16 AM |
| 58 | I believe it is a mistake to eliminate the standard. Removing any access to potential care to the public is unconscionable. Every access point that currently exists should remain accessible, regardless. | 6/21/2023 6:00 PM |
| 59 | with the changes in ohip affecting optometrist and ophthalmologist billings, i don't think it is necessary for opticians to be able to refract. If we work on conjunction with an optometrist, we can help pre-test but the health of the eye needs to be examined by the doctor. If Opticians are allowed to refract, many patients forego the dr exam and that is not for the better of the patient's health. | 6/21/2023 1:25 PM |
| 60 | I approve eliminating standard 8 | 6/21/2023 12:35 PM |
| 61 | We should keep this. The more we give away the less we know as a group. | 6/21/2023 12:08 PM |
| 62 | Agree | 6/20/2023 9:02 PM |
| 63 | Agree | 6/20/2023 5:27 PM |
| 64 | It appears that standard 8 is now obsolete...why keep it | 6/20/2023 4:38 PM |
| 65 | This is a good idea. There is no need for Standard 8 to exist. | 6/20/2023 3:02 PM |
| 66 | While opticians are educating themselves on refraction, having a refraction designation does not have any added value - glasses or contacts cannot be prepared and dispensed based off a refraction alone. Standard 8 is confusing and only useful to a few opticians, Standard 10 applies to all opticians is much clearer. I think all opticians would benefit from additional continuing education related to refraction. | 6/20/2023 2:11 PM |
| 67 | there is no need for this designation, as if all optician or these opticians will refract, those people will never go to see their OD, which will risk their eye health. Even if you ask them to sign a consent or something. they will be at risk. | 6/20/2023 12:52 PM |
| 68 | Yes I agree with the proposal which will benefit the public and the practices of licensed optician. | 6/20/2023 11:27 AM |
| 69 | Standard 8 should not be eliminated. Opticians are all being educated at school and through continuing education to perform this task. As regulated health care professionals' Opticians standards of practice should be based on qualifications and not be dependence on another to preform what they are fully qualified to do. Standard 8 should be reactivated and allow qualified Opticians to preform refraction without delegation. A well-educated and qualified Optician is a benefit to the health care system not a harm. | 6/20/2023 10:43 AM |
| 70 | As a northern Optician i think this would be a good thing as current Refracting Opticians would be able to continue their work without having to submit paperwork. Also as you guys may know it is harder than ever to find visual care in Ontario and more in Northern Ontario. As an | 6/20/2023 10:02 AM |

Registrant Consultation: Eliminating Standard 8

Optician who practice where the wait for an eye exam is more than 6 months for all Clinic with in a 300 km radius it would also be good for us if Optician could do refraction with out having to be under the delegation of an Optometrist or Ophthalmologist. This would reduce the waiting time for all clients who are located in more rural location like mine. (Hearst, ON, P0L 1N0) This would also encourage current Opticians of Ontario to get the refracting knowledge needed to be able to practice refracting and provide clients support when an Optometrist or Ophthalmologist is not present at the office.

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| 71 | no comment on this issue. | 6/20/2023 9:49 AM |
| 72 | I would say leave things the way they are. As more opticians become educated in refraction I believe standard 8 will have its place in the future. | 6/20/2023 8:21 AM |
| 73 | There should be a refracting designation and proper education about refraction otherwise people will start using this tool for financial profits. People will ignore patients eyes health and serious patients will suffer. There must be a refracting designation. | 6/20/2023 8:17 AM |
| 74 | I have been an Optician since 1974 in the past 49 Years I have worked in practices with ophthalmologists fitting RGP and gas permeable contact lenses for aphakia as well as keratoconus clients doing the refraction under the umbrella of the Prescribing Doctors . I do think the proposal to eliminate Standard 8 in the Refraction Designation is a great Idea since Optician can not legally prescribe . | 6/20/2023 7:42 AM |
| 75 | I think the optometrist and ophthalmologist still should delegate the optician s because the opticians then starts to take on a different role At the end what about the welfare of the patients | 6/20/2023 6:34 AM |
| 76 | Should leave refraction for optometrists or ophthalmologists etc. and reinforce the necessity knowledge as an opticians. Some opticians even not have enough basic ocular knowledge. | 6/20/2023 6:09 AM |
| 77 | Standard 8 should be cancelled. | 6/20/2023 12:40 AM |
| 78 | Standard 8 is in total detriment to the optician practice however the designation should still remain. | 6/19/2023 11:30 PM |
| 79 | As an optician, I want to provide better healthcare to the people. I want Optician to be highly skilled in eyecare not just a "salespeople". Having a refraction skills is important. I want Opticians to be recognized, respected and appreciated by the public. I believe that Refraction should not be eliminated and should remain as a Standard Practice. As an Opticians, I want to continually growing, learning and improving. Refraction is a must! | 6/19/2023 10:51 PM |
| 80 | I think the idea of moving refraction to delegation under the authority of a practicing optometrist or ophthalmologist is reasonable. | 6/19/2023 10:38 PM |
| 81 | agreed | 6/19/2023 10:22 PM |
| 82 | This was a stupid designation for a select group opticians who got duped in wasting their money on courses that wouldn't have even gotten them anywhere near being an Optometrist. Good riddance to the refracting designation. | 6/19/2023 9:23 PM |
| 83 | Honestly I don't see the need. We are charged over a \$1000. Minimum wage or standard salary isn't very high and in most places our job as Opticians it is taken for granted. Plus we aren't allowed to perform refraction anyways. I just feel a bit disappointed. Do not see the need | 6/19/2023 8:03 PM |
| 84 | *I think this is a stunningly ill timed step backwards and we should be encouraging this practice rather than eliminating it. This is a horrible proposal. | 6/19/2023 8:02 PM |
| 85 | I think the refracting designation is important in order to recognize those who have successfully completed the additional two years which is significantly more than what is currently being offered under a general opticianry license. The two are not equal, nor should they be considered as such | 6/19/2023 7:41 PM |
| 86 | I think this is fine, especially if the refraction Opticians aren't using that part of their license. The only issue could be is if those Opticians do not work with ODs, they then wouldn't be able to refract any longer. | 6/19/2023 7:23 PM |
| 87 | Very redundant standard, very few actually refracting, needs to be eliminated, should have an RGP CONTACT LENS fitter designation, since it is a specialty that should be given extra income for it. The income of this profession is not advancing with the times, and it will trigger mass exodus from it, and will bring its demise, very soon | 6/19/2023 7:13 PM |

Registrant Consultation: Eliminating Standard 8

| | | |
|-----|--|-------------------|
| 88 | I think it's a fine line. When patients visit an optometrist for an eye test, they're examined by a practitioner who is trained to recognise abnormalities and conditions, whereas an optician is involved, our emphasis is on fitting eyeglasses, contact lenses, and other vision-correcting devices. I think the refraction aspect should be left to the optometrist as it's part of the comprehensive eye exam. I don't know how "refraction" would be advertised by an optician | 6/19/2023 7:11 PM |
| 89 | I look forward to gaining this knowledge and working with my optometrist | 6/19/2023 7:04 PM |
| 90 | I do think by eliminating Standard 8 that it would simplify the process for the optician. Replacing it with Standard 10 would still allow the optician to refract under the delegation act from an optometrist or ophthalmologist. | 6/19/2023 7:01 PM |
| 91 | 100 percent agree with eliminating this standard. We never should have had it to begin with. It's a detriment to public health as patients receiving a refraction from an optician will have the impression they "have had an eye exam" where there has been no examination of eye health. Aside from the hazard to the public this represents, if an optician is not allowed to dispense glasses or contacts from the refraction what is the purpose of doing it? Are we just handing over the refraction results so the patient can purchase from an online retailer? | 6/19/2023 6:49 PM |
| 92 | I agree that Optician should be able to refract under the guidance of the policy's and OD with right education and skills. It's a lot of hassle to submit all the consent forms to COO. | 6/19/2023 6:42 PM |
| 93 | We should be able to refract to a degree where we can issue an Rx for glasses and I agree if passed they should have to do more continuous education. However, it is stays how it currently is where you cannot refract and give an RX , then I don't think they should have to do more continuous education. | 6/19/2023 6:31 PM |
| 94 | This standard should be eliminated as is fat too restrictive and undermines the Opticians professional judgment. | 6/19/2023 5:59 PM |
| 95 | With standard 10, is no need for it. | 6/19/2023 5:50 PM |
| 96 | Agree with this step since most of the refraction optician aren't allowed to practise. | 6/19/2023 5:48 PM |
| 97 | No comment | 6/19/2023 5:38 PM |
| 98 | I believe that it always a good practice to complete training or patient refraction submissions just a best practice. I don't think I'm in favour of removing this standard. I don't refract myself as i am not qualified for that but I feel that Standard 8 should not be removed. | 6/19/2023 5:12 PM |
| 99 | Under strict delegation opticians who are eligible should be able to refract | 6/19/2023 5:11 PM |
| 100 | No coment | 6/19/2023 5:09 PM |
| 101 | Eliminate Standard 8 is my advice. | 6/19/2023 4:25 PM |
| 102 | My concern with eliminating Standard 8 is that those who hold the refraction designation and do not have to do the CE for refraction is, how does the College know that they are getting the most up to date learning tools and refreshers if it is not being monitored. This makes me question if there are many other Opticians that have to fulfil the CE for Eyeglasses and Contact Lenses why do the people that work under a practitioner need to do the CE as well? It is still beneficial to maintain the CE credits for everyone including non active Opticians such as myself as it keeps everyone up-to-date on their knowledge/skills. | 6/19/2023 4:03 PM |
| 103 | Good idea | 6/19/2023 3:57 PM |
| 104 | if this works better for those who have this designation, then it is okay. | 6/19/2023 3:57 PM |
| 105 | I think refracting should be left to the optometrist in general. | 6/19/2023 3:52 PM |
| 106 | I agree to eliminate it | 6/19/2023 3:47 PM |
| 107 | I agree that this standard should be eliminated. | 6/19/2023 3:43 PM |
| 108 | If optician cannot refract I would say makes no sense but to have stand 8 | 6/19/2023 3:39 PM |
| 109 | No concerns | 6/19/2023 3:35 PM |

Q1 Please indicate if you are a :

Answered: 15 Skipped: 0

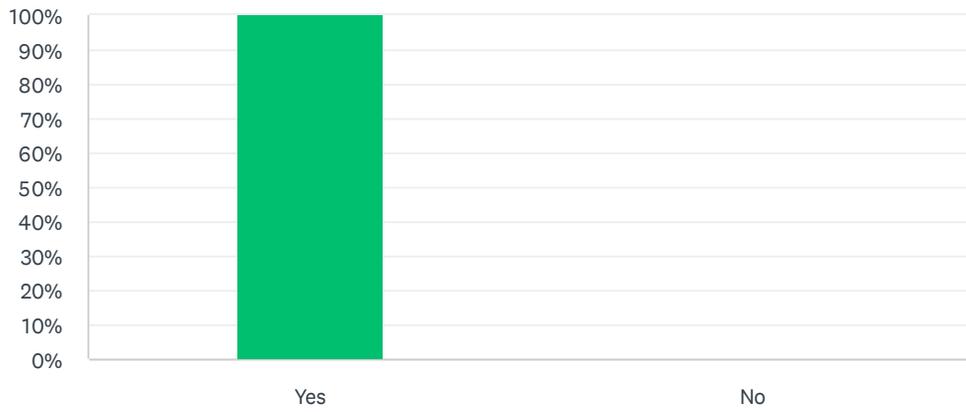


| ANSWER CHOICES | RESPONSES | |
|---|-----------|-----------|
| Registered Optician | 100.00% | 15 |
| Registered Student or Intern Optician | 0.00% | 0 |
| Member of the public | 0.00% | 0 |
| Representative of another regulatory body | 0.00% | 0 |
| Other (please specify) | 0.00% | 0 |
| TOTAL | | 15 |

| # | OTHER (PLEASE SPECIFY) | DATE |
|---|-------------------------|------|
| | There are no responses. | |

Q2 Do you have refracting designation?

Answered: 15 Skipped: 0



| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|----|
| Yes | 100.00% | 15 |
| No | 0.00% | 0 |
| TOTAL | | 15 |

Q3 If yes, will eliminating Standard 8 impact you negatively, and, if so how?

Answered: 10 Skipped: 5

| # | RESPONSES | DATE |
|---|---|-------------------|
| 1 | <p>The elimination of Standard 8 would impact me very negatively. Not only would it totally negate the effort that I put into getting the refraction designation but it would diminish me in my own perception of myself as an optician and also in the eyes of my customers as they have always known me as a Refracting Optician. It has been a very valuable designation to hold and has helped me immensely in my practice by lending credence and authority to my trouble shooting skills. It has helped me gain the trust of customers on numerous occasions by demonstrating that I can see their problems from both the angle of the refractionist AND the dispensing optician, by thoroughly understanding what the actual refraction entails and where potential acuity problems can pop up once the glasses are made and used in real life. In fact, the fact that I have this background has proven very important to my livelihood. In the very price competitive optical industry many customers are less interested in service and quality than they are in price and convenience. Having these skills has set me apart from competitors by being an excellent trouble shooter. I have been able to solve customers' problems with both progressive and single vision lenses by being able to communicate confidently with prescribers in the language that they understand and respect. I have come to earn the respect and recognition of many OD's, not only those in my own practice but in my area who know with certainty that if anyone can solve their patient's non-adaptation problems, it's me. To not have my designation recognized would most certainly adversely affect my ability to make a living as an optician/store owner. I take this issue so seriously that I feel having this taken away after more than 15 years will cause me a certain amount of depression. Since I received the email on June 19 regarding the elimination of Standard 8, I have been feeling a lot of anxiety about losing my designation. In the 28 years that I have been licensed, I feel that getting refraction status has really been the only "win" that I have had in my career. It was a "win" for the College, I feel as well, as a great deal of effort was put into getting the approval of the Ministry of Health. As short lived as that may have been, with the Ministry directed the College to discontinue processing applicants for refracting status, it remains to have been the closest to expanding optician's scope of practice as the College has ever gotten. I believe that to eliminate it at any point in time will just discredit any future efforts by the College to expand our scope of practice in any direction. At this point in time, the fact that artificial intelligence is taking on such an integral role all over the globe in every facet of life may in fact lead to unimaginable changes in the optical industry. The entire eye exam, not just the refraction aspect but including the eye health assessment and diagnosis, will undoubtedly be taken over by AI processes in the not too distant future. No one can predict to what degree of obsolescence the role of optician and optometrist will be touched. Maybe opportunities will open up for us 40 refracting opticians that will not be available to other opticians. Maybe it will become important to have the formal training behind us or at least prove to the decision makers that we are capable of and dedicated to receiving whatever formal training necessary for one day be granted the right to perform stand alone refractions. I have nothing against all Ontario licensed opticians being able to refract under delegation an optometrist or ophthalmologist but that shouldn't negate the refracting status of those who currently hold it. Let us keep what we have earned at the same time. I don't see any reason why both cannot exist. It is no consolation to me that I wouldn't be required to fill out a form once in a while or not have to earn an 2 extra CE credits a year. I am happy to do whatever it takes to keep my status. For me, there is no good that would come out of the elimination of Standard 8 and it doesn't stand in the way of the rest of Ontario opticians refracting by whatever means available to them. I would love to see the College work towards a solution where one day stand alone refracting by opticians would be allowable. Or maybe try to create some kind of University affiliated program that would lead to some form of "advanced credit" extended to those with refracting status to pursue a modified form of optometry that would enable stand alone refraction. Shouldn't the ultimate goal of the College of Opticians be to extend our scope of practice by pursuing stand alone refraction rather than just allowing opticians to work as well-educated pre-testers in an optometrist's office? Although I am not opposed to that happening, I</p> | 8/18/2023 3:18 PM |

Registrant Consultation: Eliminating Standard 8

personally would like to see advancements made in our profession that would allow us a more independent future.

| | | |
|----|---|-------------------|
| 2 | Yes. Refracting Registered Optician (RRO) should be maintained, and Standard 8 re-written to give to the public more confidence in these Opticians who have already specialized in providing refraction to the public. They are fully qualified to do so. | 8/15/2023 2:39 PM |
| 3 | No | 8/15/2023 9:59 AM |
| 4 | No, it has no negative impact on me. | 8/14/2023 9:40 PM |
| 5 | Not at all, it help us to provide better services. | 8/14/2023 9:39 PM |
| 6 | no | 8/11/2023 3:46 PM |
| 7 | no | 6/20/2023 9:28 PM |
| 8 | Professionally and for the industry yes. Opticians need to expand their scope of practice independently. This opening should not be closed. | 6/20/2023 8:23 PM |
| 9 | no | 6/19/2023 4:36 PM |
| 10 | Does not | 6/19/2023 4:36 PM |

Q4 Please provide any comments or feedback on the proposal to eliminate Standard 8 and the Refracting Designation.

Answered: 9 Skipped: 6

| # | RESPONSES | DATE |
|---|---|--------------------|
| 1 | please see previous question | 8/18/2023 3:19 PM |
| 2 | Please read my answer to point #3. Thank you. Also, I fully support the content of the letter that OAC sent to COO in this matter after thoughtful roundtable of OAC's members. | 8/15/2023 2:43 PM |
| 3 | human knowledge has to develop organically, we can not eliminate one thing and stop the access to higher education. I believe now is the time for Ontario institutes to come up with a bridging program for opticians to become optometrists. | 8/15/2023 10:07 AM |
| 4 | I strongly agree that Standard 8 should be eliminated in Ontario. I've observed numerous patients waiting to be seen by optometrists (and ophthalmologists) solely for basic refraction. Removing Standard 8 would offer patients more on-demand services and allow optometrists to focus on diagnosing eye diseases instead of primarily conducting refractions. | 8/14/2023 10:07 PM |
| 5 | I strongly recommend to eliminate Standard 8 as it is preventing refractionist to perform with huge customer service demand in Ontario. | 8/14/2023 9:47 PM |
| 6 | I think refraction is kind of necessary for opticians to know about it even they dont do it, still it would add helpful knowledge related their carrier. | 8/11/2023 3:47 PM |
| 7 | Totally agree to expand the opportunity to refract to all opticians and Eliminate standard #8 First of all, I want to thank the COO for the valuable effort to broaden the field of action for opticians. It is very important to put our knowledge into practice since many of us have the knowledge and enough practice and ability to work together with optometrists and ophthalmologists. Not only because of the important training we received at the college but also because of the facility we have had to go deeper through subsequent studies. In addition, some opticians practiced our profession as Optometrists in our country of origin and we can do a good job together with Drs Optometrists and Ophthalmologists. Thank you | 7/2/2023 7:32 AM |
| 8 | This proposal does not benefit opticians. Two years of study will be wasted for those with this designation. Standards 8 should be enhanced rather than eliminated. More opticians are taking refraction course. Why closing the doors on them? Presence of this avenue encourages opticians to gain refraction knowledge advance their carrier. | 6/20/2023 8:29 PM |
| 9 | I feel the optician should work under a prescribed practitioner | 6/19/2023 4:37 PM |

[REDACTED]

From: [REDACTED]

Sent: June 19, 2023 11:20 PM

To: Professional Programs <QA@collegeofopticians.ca>

Subject: Re: We want to hear from you!

Dear Fazal and the COO Team,

Please find below my feedback:

1. Refracting Optician designation should be kept in place, but it should be re-named as Refracting Registered Optician (R.R.O.)

Small group of Refracting Opticians, who got this designation years ago, put lots of effort and money in four years of postgraduate program in Barrie College + countless exams + thousands of \$\$\$ + required refraction fittings that cost lots of trouble to get a fitting/signing supervisor, and lots of \$\$\$ to each Refracting Optician to pass these fittings. It is totally unjustified and irresponsible to cancel this designation by their own College now.

Refracting Opticians should be named on their batches appropriately as Refracting Registered Opticians (R.R.O.) to distinguish them from regular Registered Opticians (R.O.).

Also, the necessity for the patients to fill the forms that supposed to be forwarded to the College should be eliminated. These forms are not welcomed by patients who do not want their names and personal records to be forwarded to the organization which they usually don't know and are not associated with = the College. They just want the refraction and vision correction from the health professional = Refracting Registered Optician, but not from the College. Refracting Registered Opticians are well trained to do this job.

Refracting Registered Opticians should be able to refer patients to O.D. or M.D. if there is a medical need for this. Medically, they have been well trained to handle this during their four years of postgraduate program in refraction. But, currently, system of payment for Refracting Registered Opticians is not in place. They should be given a Billing #, so O.D. and M.D. and Ophthalmologist would be paid for referrals from Refracting Registered Opticians according to the rules in our existing system of payments from OHIP office. For example, M.D. refers patient to Ophthalmologist and provides his/her Billing #, so Ophthalmologist would be able to charge his/her specialist's fee. Our present medical and billing hierarchy is: O.D. -> M.D. -> Ophthalmologist. It is time to include Refracting Registered Optician (R.R.O.) in this scheme too.

Also, it would be nice if the College negotiates with the Government that Refracting Registered Opticians have OHIP billing #, as currently O.D. and M.D. have, and would be able to be reimbursed by OHIP for refractions equally to O.D. and M.D.

2. It is okay to allow all Registered Opticians (R.O.) to do refractions under delegation from either O.D. or M.D. (but not exclusively from Ophthalmologist).

Actually, one does not need to be trained as Optician to take such a delegation. Presently, Optometrists or Medical Doctors could delegate their duties to anybody whom they feel it appropriate (governed by their delegation act). They can delegate to wives, husbands, students, hair dressers, taxi drivers, administrative assistants, and so on, if the requirements of their Delegation Act are fulfilled. Obviously Opticians are well qualified for this delegation.

Many Opticians do not work in shared practices with O.D. or M.D. It is wrong to assume that all Opticians would be able to take this delegation, because majority of Opticians would simply not have any O.D. or M.D. at their work place.

In summary, I am for establishing independent designation of R.R.O. (as described above in point #1), and for allowing all R.O. to perform refraction as delegation from M.D. or O.D. (as described above in point #2).

Please let me know if you have any further questions.
Pleasure to help.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [Anna Jeremian](#)
To: [Peggy Dreyer](#)
Subject: FW: refraction
Date: Thursday, August 17, 2023 4:06:59 PM

-----Original Message-----

From: [REDACTED]
Sent: Monday, August 14, 2023 10:37 AM
To: Anna Jeremian <ajeremian@collegeofopticians.ca>
Subject: ****Alert - POTENTIAL SPAM refraction

Just a quick comment, The art of refracting should be available to any optician who fits specialized lenses

Most of my patients are referred to me without an up to date RX as the corneas are so distorted that it is impossible to get a refraction. That being the case I get a best fit and then over refract to enable me to get a lens which the patient can then wear. I have refracting experience (I was an optometrist in the UK) but I am the exception. Any optician who fits these types of lenses must have refraction training.

As an aside, Opticianry was included in the RHPA due to the fact that we were fitting contact lenses, especially for compromised eyes. Remove that and you leave it open to removing registration under the RHPA.

[REDACTED]



August 10th, 2023

Dear Fazal and COO Team,

We extend our gratitude for affording the Ontario Opticians Association (OOA) the opportunity to provide its insights regarding the proposed elimination of Standard 8. The Ontario Opticians Association takes pride in its role as a representative of Ontario Opticians, valuing the input of its members on a range of matters.

Following dialogues with numerous members and the collection of feedback through a brief survey, we are pleased to present our perspective on the proposed removal of Standard 8.

To commence, let us emphasize that the OOA and its members do not support the removal of Standard 8. We acknowledge the challenges posed by this standard and the fact that many Refracting Opticians do not currently adhere to its provisions. However, the OOA is not in favour of revoking the designation of Refracting Optician from individuals who have invested substantial time and resources into their education. We firmly believe that it is advantageous for Opticians to distinguish themselves if they possess higher education. Furthermore, for the safety and peace of mind of the public, it is essential that individuals seeking eye care services can easily identify the education and expertise of the practitioner. Opticians who have received specialized training in refraction should have the ability to demonstrate their proficiency to both employers and the public.

Undeniably, the wording of Standard 8 is impractical and, quite frankly, nearly unattainable. We propose a revision of Standard 8 to align with the contemporary expectations and requirements of opticians. The OOA is enthusiastic about contributing ideas and engaging in collaboration with the COO on this front.

A decorative graphic consisting of a grid of small grey dots, with some dots missing, creating a pattern on the left side of the page.

In the context of Standard 10, we recognize the potential it held to encourage Opticians to perform refractive services under the guidance of a licensed Regulated Health Professional. However, our data reveals that a significant number of members have not embraced this standard. One major factor is a deficiency in education on this subject. As we await the emergence of a new cohort of opticians with the requisite knowledge, it is prudent to utilize our current Refracting Opticians as intermediaries. Let us harness their expertise.

The designation carries substantial weight for both members and the public. It conveys the Optician's education and competence, offering assurance to the public while indicating to employers the Optician's capability to undertake assignments with professionalism and proficiency.

We ardently believe that a revision of Standard 8 pertaining to refraction would dispel confusion among our membership and the public, while also motivating Opticians to pursue the necessary education to excel in this field. Keeping members' education aligned with employers' expectations and the needs of potential patients remains paramount. Stripping Opticians of a designation they have diligently earned could be perceived as punitive. These Opticians have devoted their time and energy to enhance their skills, ultimately benefiting their patients. Let us take inspiration from their leadership and avoid stifling their contributions.

With respect,

Martin Lebeau RO and OOA Board of Directors
Ontario Opticians Association
"The Official voice of Ontario Opticians."

The Impact of Eliminating the Refracting Designation for Opticians:

A Comprehensive Analysis 2023

AUGUST 10

**Opticians Association of Canada
Authored by: Robert Dalton**



OPTICIANS
ASSOCIATION OF CANADA

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The Impact of Eliminating the Refracting Designation for Opticians: A Comprehensive Analysis

Introduction:

The report delves into the potential consequences of eliminating Standard 8 and the Refracting Designation, considering their effects on opticians' professional development and future opportunities. *. The Opticians Association of Canada will go on record as being against removal of Standard 8 at this time.*

Positive Impacts:

- ***Streamlining Standards:*** Removal of the Refracting Designation and Standard 8 would lead to streamlined and simplified standards of practice. This will reduce the need for additional continuing education hours and patient acknowledgment forms, resulting in a more efficient regulatory framework.
- ***Flexibility and Delegation:*** Opticians without the refracting designation will still be permitted to perform refractions under Standard 10, working under the assignment or delegation of an authorized prescriber. This ensures their ability to provide refraction services within an established professional framework.
- ***Focus on Core Competencies:*** Eliminating the refracting designation allows opticians to concentrate on enhancing their core competencies, delivering quality eyecare services within their scope of practice. This may lead to a more specialized and skilled optician workforce.

Negative Impacts:

- ***Limiting Independent Refraction:*** A major concern raised by opticians is the potential restriction on their ability to perform independent refractions in the future. Opticians might need to lobby for new legislation to regain the autonomy they had under the refracting designation.
- ***Uncertainty for Career Progression:*** The elimination of the refracting designation might create uncertainty for opticians who have invested time and effort in obtaining the designation. Without it, there may be fewer avenues for professional growth and specialization.
- ***Impact on Optician Training Programs:*** The removal of the refracting designation could impact the curriculum of optician training programs, necessitating adjustments to adapt to the changing regulatory landscape.
- ***Consumer Perception:*** The refracting designation is a recognized credential among consumers, signifying a higher level of expertise. Eliminating it may lead to a perception

among patients that opticians without the designation are less qualified, potentially affecting public trust in optometry services.

Conclusion:

The report provides a balanced analysis of the proposal's implications, considering both its potential benefits and drawbacks. The OAC urges the College to thoughtfully weigh the consequences of the proposal and consider the informed feedback of Opticians as well as the Opticians Association of Canada and the Ontario Opticians Association (OOA). We understand that the OOAA has conducted a survey of the Ontario Opticians and we will defer the discussion of those results to the OOA. A well-informed decision, considering both the efficiency of standards and professional opportunities, will be crucial in shaping the future of Opticianry practices in the province and indeed in Canada. We encourage you to review this report in detail and share any additional insights or feedback you may have. Your decision/input as a valued member of this industry is essential in shaping the outcome of our future. ***The Opticians Association of Canada will go on record as being against removal of Standard 8 at this time.*** Thank you for your attention, and we look forward to hearing from you. Best regards,

Robert Dalton
Executive Director
Opticians Association of Canada



***The decisions we make today can affect our way
of life tomorrow – make informed choices.***

