



**College of
Opticians
of Ontario**

85 RICHMOND STREET WEST, SUITE 902
TORONTO, ONTARIO M5H 2C9

Tel: 416-368-3616 800-990-9793

Fax: 416-368-2713 800-990-9698

October 24, 2007

Mr. Lorne Kashin, RO
President
Opticians Association of Canada
5650 Yonge Street, Suite 1500
Toronto, ON M2M 4G3

Dear Lorne:

Re: Standard of Practice for Refractometry

Attached please find a copy of the College's Standard of Practice for Refractometry and ancillary documentation that was approved by the College Council on September 25, 2007 and will be made generally available through the College's web site on October 24, 2007.

From the formal submissions made by the OAC and the OOA and from our numerous conversations, we readily acknowledge that this Standard of Practice falls far short of what either Association believes is both reasonable and necessary. Nevertheless, the College Council has decided to proceed with the Standard of Practice as written. On one hand, the Council is convinced that it is in the public interest to allow those Opticians who have demonstrated their competency to do so to refract, thereby enhancing the public's access to an important health care service as well as enhancing the public's choice among alternate providers of the service. On the other hand, this College is obviously bound by the controlled act provisions as they currently exist in the (Ontario) *Regulated Health Professions Act*, which means that this College cannot allow its members to perform the controlled act of dispensing except as provided for under the *Regulated Health Professions Act*. In preparing the Standard of Practice, the College was also mindful of the admonitions in Minister Witmer's letter dated February 7, 2001, as well as those of HPRAC in its last report to the Minister.

Accordingly, I'm asking that the Opticians Association of Canada support the College in the implementation of this Standard of Practice. We have made the same request of the OOA and have offered to collaborate with them in their member communications relating to the Standard of Practice.

This Standard of Practice, particularly the requirement that Opticians be certified by this College before performing refractions, may require discussion with respect to the Mutual Recognition Agreement under the Agreement on Internal Trade. We will be in contact with the Opticianry regulatory bodies in the other provinces to explore what, if anything, needs to be done in this regard and will ensure that you are kept fully informed.

Yours sincerely,

Caroline MacIsaac-Power, RO
Registrar