



February 1, 2006

Hon. Iris Evans
Minister of Health and Wellness

Via courier to Legislative office

Dear Minister:

Re: Proposed changes to the HPA for Opticians Schedule

The Canadian Association of Optometrists (CAO) has just become aware of the proposed changes to the Health Professions Act for Opticians Schedule via receipt of the letter to you from Dr. Larry Gies, President, Alberta Association of Optometrists (AAO) dated January 31, 2006.

CAO shares AAO's grave concern about this dramatic and unprecedented expansion to scope of practice. We are equally shocked at the lack of consultation with stakeholders and the absence of evidenced based justification.

Throughout North America, opticians are trained to dispense eyeglasses, and in some cases, contact lenses, based on a prescription from an optometrist and ophthalmologist. Ophthalmic dispensing is a technical process that is unregulated in many instances. It is reasonable to expect that those individuals who wish to perform eye care at a higher level are obligated to seek relevant and competent training at recognized Schools of Optometry and Medical School.

It would seem that Alberta opticians are attempting to take an opportunistic and inappropriate advantage of government policy that supports increases in scope of practice. We believe it is irresponsible for a regulated group to simply adopt a 'wish list' without any demonstrable evidence of equivalency in eye health care education, competency and skills. In previous submissions, opticians repeatedly indicated that their proposed sight-testing model has nothing to do with prescribing, assessment or diagnosis of eye health, because they recognize they are not qualified to do so.

Eye sight and eye health are interrelated, interdependent and are important features of a person's well being. The future of 'best' patient care, efficient delivery systems and the prevention of blindness are reviewed collaboratively at a national level by the National Coalition for Vision Health. It includes groups such as CAO, the Canadian

Ophthalmological Society, Canadian National Institute for the Blind, Foundation Fighting Blindness, and the AMD Alliance.

There is considerable potential for better use of resources, interdisciplinary models of eye care delivery and use of new technologies. There has been no consideration and certainly no consensus on expanded scope of practice for opticians.

We support the view of the AAO that this 'housekeeping' proposal be set aside immediately because it is much more than that – it represents an unjustifiable major change in scope of practice.. It will surely warrant the attention of legal/ liability experts, consumers and health care sectors in Alberta and beyond. We encourage you to convene a formal meeting with the Alberta Association of Optometrists at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Morrow', with a long horizontal flourish extending to the right.

Dr. Dorrie Morrow
President

Cc CAO Councillors
Dr. Larry Gies, President, AAO