

March 25, 2003

Marilyn Wang, Director  
Program Policy Branch  
Ministry of Health and Long-Term Care  
8<sup>th</sup> Floor, Hepburn Block, 80 Grosvenor St.  
TORONTO, ON M7A 1R3

Dear Ms. Wang:

I am writing on behalf of the Canadian Association of Optometrists (CAO) concerning the proposal of the Ontario Association of Optometrists (OAO) entitled, "Proposal to Extend the Scope of Practice of Optometrists in Ontario", dated February 21, 2003. The CAO is pleased to respond to the questions attached to the proposal.

Recent national health care studies, including the Romanow Commission, acknowledged the need for increased scopes of practice and better utilization of a variety of health care providers. The CAO supports and encourages all provinces to include the authority of optometrists to prescribe Therapeutic Pharmaceutical Agents (TPAs), in their scope of practice. Presently, there are five provinces and one territory where optometrists have that authority. In addition, British Columbia and Newfoundland are in the process of obtaining authorization for optometrists to use TPAs. We also understand that prescribing authority in Quebec will be finalized in June 2003 and will consist of comprehensive categories of medication including corticosteroids and anti-glaucoma agents.

While the range of drugs authorized for use by optometrists varies from province to province, the experience in Canada and the United States indicates that the public is best served when medications used by optometrists are not unreasonably restricted.

Question # 1

*Would the OAO's proposal to add the authority to prescribe TPAs to Optometry's list of controlled acts accomplish any of the following?*

- a) increase accessibility to eye and vision care?*
- b) allow patients to receive more timely attention for certain eye conditions?*
- c) reduce medical practitioner's time devoted to the treatment of certain eye conditions to allow them to focus on other patient needs?*

Adding the authority to prescribe TPAs to optometrists has increased access to timely eye and vision care in those provinces and territories where the use of TPAs by optometrists is now permitted. This is particularly the case in provinces with large geographical areas where optometrists are widely distributed. The experience elsewhere reveals that the residents of Ontario will also benefit from improved access to safe and effective eye care.

The CAO understands that in Ontario, as in other provinces, delays for access to eye care can be unreasonable. Additionally, with an undersupply of family physicians, especially in rural areas, many patients do not have easy access to the services of general physicians. Granting the authority to prescribe drugs to optometrists would help to reduce these delays.

A recent survey conducted by the College of Family Physicians of Canada (CFPC) found that more than 4 million patients do not have a family physician. Transferring the treatment of some eye diseases from the care of physicians to optometrists would provide more physician time for other aspects of medical care. This can be achieved safely and with practitioner collaboration.

Question # 2

- a) *Given their education and training, and considering issues of public safety, should optometrists be granted the authority to prescribe the requested TPAs in order to treat and manage the ocular conditions discussed in the OAO's proposal?*
- b) *Under what circumstances and parameters would it be appropriate for optometrists to prescribe TPAs in Ontario?*

Our review of the proposal indicates that the scope of practice requested by Ontario closely resembles TPA legislation in effect in Alberta since 1995 and currently pending in Quebec. The experience reported in Alberta and other jurisdictions in Canada, both by patients and by practitioners, has been positive. Also noteworthy is that many U.S. States have much broader prescriptive authority than is being proposed by the OAO.

Practice guidelines and standards of practice developed and applied through the regulatory authority for optometrists in Ontario would determine the circumstances and parameters for the appropriate use of TPAs. The College of Optometrists of Ontario would be responsible for the assurance of competence and the qualification of optometrists to treat patients by prescribing medications consistent with their legislated scope of practice.

Question # 3

*Are the requested categories of drugs appropriate for the treatment of the ocular conditions discussed in the OAO's proposal?*

The categories of drugs proposed by the OAO are consistent with drugs used by optometrists throughout Canada and the United States. All of the drug categories are directly related to the diseases that optometrists are qualified to diagnose and treat. The list of categories is restricted only to the treatment of ocular diseases.

Question # 4

- a) *Is the request to order diagnostic laboratory tests appropriate and necessary in conjunction with the ability to prescribe TPAs?*

b) *Are the lab tests requested by the OAO appropriate and necessary for the diagnosis of the ocular conditions discussed in the OAO's proposal?*

The ability to confirm a diagnosis with a laboratory test is an important consideration of quality patient care. The CAO supports the use of diagnostic laboratory tests as an adjunct to prescriptive authority. All provinces are encouraged to utilize this necessary practice tool.

The CAO understands that the proposal is based upon clinical protocol that is broadly accepted in most jurisdictions in the United States, where it is evidence based and part of routine optometry practice.

Question # 5

*Comments are invited on collaboration between primary eye care providers and referral/consultative arrangements.*

The CAO has established that optometric TPA authorization in other provinces has had the positive effect of enhancing collaboration between all related health care providers. We expect that the provincial regulatory authorities will insure that appropriate guidelines are installed to enhance referral and consultative dialogue between practitioners.

TPA use by optometrists throughout North America has proven to be safe and effective. The experience in other provinces reveals that granting the authority to prescribe medication to optometrists has been a benefit to the public, resulting in better access and more timely care. We expect that patients in all provinces of Canada will one day have the opportunity to obtain a broader range of treatment from their optometrists. The CAO encourages the Ontario Ministry of Health and Long Term Care to update the scope of practice for optometrists in Ontario to include prescriptive authority for the full spectrum of drugs requested in the proposal submitted by the OAO.

Thank you for the opportunity to comment on this important matter of public interest. We trust that our response will assist you in your review of this proposal.

Yours truly,

Scott Mundle, OD  
President

c.c. Barbara Wattie Fuller, OAO  
Council, CAO

