

THE CANADIAN
ASSOCIATION OF
OPTOMETRISTS



L'ASSOCIATION
CANADIENNE DES
OPTOMÉTRISTES

April 26, 2006

Mr. Daryl Beckett
Acting Director, Professional Regulation
Ministry of Health
5-2, 1515 Blanshard St
Victoria BC V8W 3C8

Dear Mr. Beckett;

The mandate of the Canadian Association of Optometrists (CAO) is to represent Doctors of Optometry in Canada. As the national voice of the profession, CAO works on optometry's behalf with government, industry, vision care patients, the public at large, and other health care professionals. We have over 3,400 members in Canada. We are pleased to take this opportunity to comment on the proposed bylaws for the new College of Optometrists of BC.

Recent national health care studies, including the Romanow Commission, acknowledge the need for better utilization of a variety of health care providers when it is appropriately justified. 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. We also understand that the province of Ontario will pass TPA legislation in the near future. A summary of TPA legislation in Canada and the U.S. is attached.

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.

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 true in provinces with large geographical areas where optometrists are widely distributed.

The experience elsewhere reveals that the residents of British Columbia will benefit from improved access to safe and effective eye care. Delays in access to medical 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. 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.

The experience of TPA use has been positive in the U.S. and Canada, both by patients and by practitioners. Reports from provincial licensing authorities indicate an absence of complaints regarding TPA use and that the public safety is assured. Practice guidelines and standards of practice developed and applied through the regulatory authority for optometrists in BC would determine the circumstances and parameters for the appropriate use of TPAs. The new College of Optometrists of BC 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.

Provinces with TPA legislation report that it has had the positive effect of enhancing collaboration between all related health care providers (e.g. family physicians, ophthalmologists and pharmacists). We expect that the provincial regulatory authorities in BC would ensure that appropriate guidelines are installed to enhance referral and consultative dialogue between practitioners.

CAO encourages the BC Ministry of Health to recommend that the scope of practice for optometrists in British Columbia be updated to include prescriptive authority.

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 matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Morrow', with a small flourish at the end.

Dorrie Morrow, OD
President