

THE CANADIAN  
ASSOCIATION OF  
OPTOMETRISTS



L'ASSOCIATION  
CANADIENNE DES  
OPTOMÉTRISTES

June 29, 2006

RHPA Review Project,  
80 Grosvenor St., 8<sup>th</sup> Floor  
Toronto, Ontario  
M7A 1R3

**Re: Health Professions Regulatory Advisory Council (HPRAC) Recommendations  
Chapter # 3 – Regulation of Optometrists**

The Canadian Association of Optometrists (CAO) is pleased to comment on the recommendations related to the Regulation of Optometrists in Ontario. Please accept this written reply in lieu of the feedback form template.

We wish to confirm our support for the 4 recommendations as follows:

**Recommendation 1.** *That Ontario optometrists be granted the authority to prescribe therapeutic pharmaceutical agents with the exception of anti-glaucoma medications.*

**Recommendation 2.** *That the Optometry Act, 1991 be amended by adding the following to section 4(4): Prescribing drugs in the categories of drugs as prescribed by regulation.*

**Recommendation 3.** *That the Council of the College of Optometrists of Ontario make regulations, subject to the approval of the Lieutenant Governor, and with prior review of the Minister, prescribing the categories of drugs to be prescribed.*

**Recommendation 4.** *That subsequent to any legislative change, and to support its successful implementation, the College of Optometry (sic) of Ontario:*

1. *Establish new practice and proficiency standards and guidelines for its members;*
2. *Establish educational upgrading and bridging programs for members;*
3. *Impose “terms, conditions and limitations” on certificates of registration for those members who have not had appropriate training in prescribing until the requisite proficiency had been achieved; and*
4. *Undertake with the College of Physicians and Surgeons of Ontario the development of joint guidelines respecting co-management of glaucoma*

*patients, referrals and other matters relating to collaboration between the two professions.*

The recommendations are generally consistent with the position of the Canadian Association of Optometrists in its brief to HPRAC dated June 17, 2005. While we would not normally support restrictions on the use of glaucoma medications, there is good potential for shared care with the recommended joint guidelines between medicine and optometry.

We are pleased that the recommendations are evidenced based and in the public interest. It would be prudent for the provincial government to implement the recommendations as soon as possible.

Thank you for the opportunity to provide comment.

Yours truly,

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

Dorrie Morrow, OD  
President

