

April 23, 2010

Honourable Kevin Falcon
Minister of Health Services
Room 337
Parliament Buildings
Victoria, BC
V8V 1X4

Dear Minister Falcon:

The Alberta Association of Optometrists (AAO) represents the optometric profession within the Province of Alberta. We were alerted to the dramatic changes announced by your office as it relates to the British Columbia Health Professions Act (HPA) and eye health services to British Columbians. The AAO congratulate you on amending BC optometry regulations to allow optometrists to treat glaucoma, a practice that is already occurring in several jurisdictions across North America.

Normally, we would not engage in writing to another jurisdiction, but the implications of your amendments are of grave concern. These amendments create a standard of eye care that does not exist in any developed nation in the world. Consequently, this may lead to implications not only in BC, but across Canada and North America. Additionally, we trust any decisions being made by your ministry are based on sound evidence-based, medical criteria and not done to meet the economic needs of a single business in your province.

First, you are contemplating the removal of most of the restrictions that allow only opticians, optometrists, or the workers who are supervised by them to dispense contact lenses or glasses. In 2006, the Ontario Health Professions Regulatory Advisory Council (HPRAC) examined similar issues to your legislative amendments. To summarize part of the report, this advisory council concluded the dispensing of subnormal vision devices, eye glasses, contact lenses or other simple magnifiers should remain a controlled act under Ontario's RHPA.

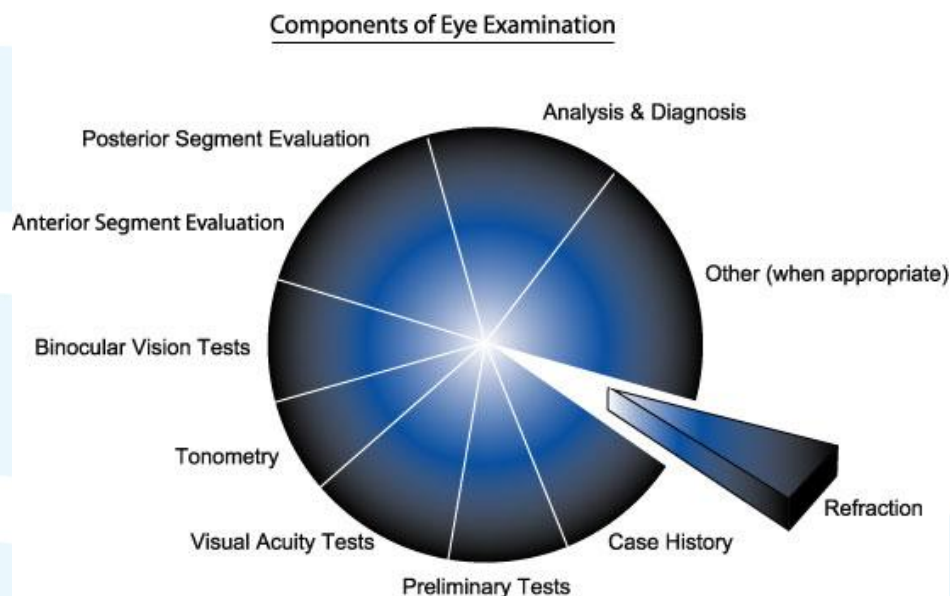
Also, allowing the public to order contact lenses or glasses online without having the seller see a copy of the buyer's prescription, sight-test assessment, or contact-lens specifications, places your citizens in harm's way. While the implications are not life threatening the ramifications to the individual, the health care system, and the productivity to an economy can be dramatic.

Specifically, ordering glasses based on an old prescription could lead to headaches, double vision, or even vision that fails the legal driving requirement. Having improperly fitted contacts could result in corneal health problems, the most serious being corneal neovascularization, corneal ulceration, and irreversible scarring.

The education required to carry out these activities is extensive for both optometrists and opticians. Even workers under their supervision go through vigorous training. When dealing with contact lenses, the health implications can be sight-threatening if the contact lenses have not been properly fitted and assessed. Even contact lens fitting opticians require an additional year of training to be able to fit and dispense contact lenses.

Second, you are proposing opticians be allowed to independently sight test or refract - a move that ignores the fact that a comprehensive eye exam is important in preventative eye health care. We want to emphasize that refractions are only one part of a complete eye health assessment. Without a full eye health assessment, diseases of the eye can, and will, be missed by refracting opticians and technicians. Sight testing will not detect glaucoma, diabetic retinopathy, age related macular degeneration, high blood pressure, or retinal detachment. Diagnosis is an evaluative process done by doctors, not a simple technical measurement.

The pie chart below illustrates the various components provided by a trained doctor when conducting an eye health assessment. As you can see, it is a complex process. To separate refraction as a stand alone procedure is irresponsible and presents an undue risk to the public. With an aging public in BC, as in Alberta, having the public gain a false confidence because of a “sight test” may well result in missing diseases that will certainly cost the system more in the long run.



By your government embracing sight testing in the manner you propose you will create “The New Low Standard” for public health in North America.

Third, we would also ask you to make available any medically based evidence recommending members of the public need only have an eye examination once between the ages of 19 – 40, and only once again between the ages of 40 – 65. Information produced in the past 10 years indicates the need to ensure the public has access to, and benefits from, regular eye health examinations.

A study of 24,570 patients conducted in 2000-2001 by Dr. Barbara Robinson, found the presence of asymptomatic eye disease in 14% of the studied patient population. Almost half of these patients were asymptomatic and two-thirds had vision of 6/7.5 or better (or in lay-persons terms, only one line worse than 20/20 or better). The study concluded that almost one in seven people presenting for an eye examination had asymptomatic eye disease and that good visual acuity does not rule out the presence of eye disease. (Document attached)

The recent CNIB Study conducted with the Canadian Ophthalmologic Society estimates approximately \$2.1 billion in direct and indirect health costs to BC if the public does not have regular eye examinations by eye doctors. If you are going to drop to “The New Low Standard” of sight testing, one can only conclude the costs to your province will rise. Instead of diagnosing and treating eye health problems early with a full eye exam, your province and citizens will pay a much higher cost afterwards—both financially and personally.

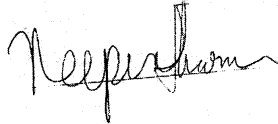
In addition to the above concerns, correspondence you have received from other associations, universities, and third party organizations has made you keenly aware of the various studies that exist that repudiate your claim for only one eye exam at two separate stages in a person’s life. The changes you are about to make will have dramatic effects upon your province, your economy, and thousands of British Columbians. Use the resources available to you within Canada to gather the evidence that will allow you to make a medically based policy that benefits your citizenry.

Fourth, ignoring the court ruling against Clearly Contacts is worrisome. The reasons given by the judge for prescription verification was to uphold public safety. All contact lens companies in the United States presently have prescription verification. It would appear by ignoring the court’s ruling and their obvious concerns for the public’s health, your changes appear to favour a single company’s economic interests.

And finally, BC, like Alberta, is a signatory to the *Agreement on Internal Trade (AIT)* that calls for governments to: (i) take steps to reconcile differences in professional standards across jurisdictions; (ii) adopt professional standards based on common inter-provincial standards; and (iii) establish transparent notification practices related to amended or new professional standards. We feel that your proposed actions violate parts of this agreement.

Clearly, the implications of the amendments to BC's HPA are wide-spread and go beyond your borders and citizens. We would request that passages of all amendments be delayed and that open and clinically guided consultation with ophthalmology, optometry, opticians, industry, and public take place. Use the resources available to you across Canada to make evidence-based decisions surrounding eye health care in your province. While we appreciated your effort to ensure that there is choice for the public, you must take the time to ensure that correct decisions are made, as the implications may be irreversible for those affected.

Respectfully,



Dr. Neepun Sharma, OD
President

- cc. Hon. Gordon Campbell, Premier of British Columbia
- cc. Hon. Gene Zwozdesky, Minister of Health and Wellness, Alberta
- cc. Hon. Iris Evans, Minister of International and Intergovernmental Relations, Alberta
- cc. Mr. Daryl Beckett, Director, Professional Regulation, BC Ministry of Health Services
- cc. Mr. Adrian Dix, Opposition Critic for Health Services
- cc. Canadian Association of Optometrists
- cc. British Columbia Association of Optometrists