

February 12, 2009

Dear Colleagues

The College of Optometrists of Ontario (COO) has recently circulated a revised Professional Misconduct Regulation for comment by the profession and other stakeholders. Unfortunately, the COO chose to revert back to its 2007 position and thereby missed an opportunity to demonstrate leadership to both the profession and the Ministry of Health and Long Term Care (MOHLTC). Regrettably, the College has done nothing to bring the practice of optometry into the 21st century. The proposed regulation still contains restrictions with respect to open collaboration, advertising, the use of trade names, and what optometrists can charge for ophthalmic appliances. In addition to disregarding the MOHLTC's guidelines for COI regulations, these restrictions violate our basic Charter rights of association and expression and go against the recommendations of the Competition Bureau of Canada.

Unfortunately, the College continues to justify these restrictions as necessary to "protect the public interest" despite the fact that the proposed conflict of interest regulations are in fact only protecting the financial interests of more established ODs at the expense of the next generation of optometrists in Ontario.

In reverting back to the 2007 proposed amendments, the College has demonstrated a complete lack of respect for the profession of optometry in Ontario. Essentially, the College is communicating to the MOHLTC that optometrists are unprofessional, cannot be trusted, and will disregard clinical standards of care, depending on the environment or business arrangement in which they practice. COOR is extremely dismayed by this portrayal of our profession to the Ministry.

Recently, the Health Professions Regulatory Advisory Council (HPRAC), in a report to the MOHLTC and other stakeholders, made the following recommendations:

- 1) "Establish a **new enabling regulatory framework** to enhance inter-professional collaboration and strengthen the self-regulation of health professions in Ontario."
- 2) "Establish a new agency – the **Council on Health Professions Regulatory Excellence (CHPRE)** – to facilitate inter-professional collaboration, promote regulatory rigour and excellence and increase accountability within the health profession regulatory system."

The Council on Health Professions Regulatory Excellence (CHPRE) will facilitate and support the **development of common conflict of interest rules by all of the Colleges that are applicable to all regulated health professionals.**

HPRAC also recommends in this report that optometrists be authorized to treat glaucoma with anti-glaucoma TPAs!

COOR supports the HPRAC proposal for the creation of the Council of Health Professions Regulatory Excellence, a common set of conflict of interest rules for all health professionals, and its recommendations for anti-glaucoma TPA privileges for optometrists.

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Reform

HPRAC clearly has a great deal of respect for Optometry as a health profession, and through the formation of the Council of Health Professions Regulatory Excellence, will force positive change.

We urge all Ontario optometrists to write the Minister of Health and Long Term Care, care of Dr. Joshua Tepper, Assistant Deputy Minister of Health and Long Term Care at Joshua.Tepper@ontario.ca and support the HPRAC recommendations.

We welcome all questions or comments. Please contact Dr. Don MacQueen, Chair of the COOR at damacqueen@yahoo.ca or Dr. Patrick Quaid at patrick.quaid@IRIS.ca for more information.

Best regards,



Dr. Donald MacQueen
COOR Chair



Dr. Patrick Quaid
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