



Study of Registration Practices of the

COLLEGE OF OPTOMETRISTS OF ONTARIO, 2007

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The Office of the Fairness Commissioner is an arm's-length agency of the Ontario government, established under the Fair Access to Regulated Professions Act, 2006. Its mandate is to ensure that certain regulated professions have registration practices that are transparent, objective, impartial and fair.

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1. INTRODUCTION

The Office of the Fairness Commissioner (OFC) undertook a study of registration practices of Ontario's regulated professions during the fall and winter of 2007–2008. The purpose of the study was to understand each regulated profession's 2007 registration practices and to establish baseline data and information to enable the OFC to measure progress as it fulfills its mandate under the Fair Access to Regulated Professions Act, 2006.

This report reflects the registration practices of the College of Optometrists of Ontario as of December 31, 2007. Information in this report was gathered from:

- face-to-face meetings with registration staff of the regulatory body
- additional documentation provided by the regulatory body
- relevant websites
- career maps for the profession posted on the Ministry of Citizenship and Immigration's website (where applicable).

The College of Optometrists of Ontario also provided registration information and statistics for 2005, 2006 and 2007 through a standard spreadsheet designed by the OFC.

An analysis and summary of the findings for all of the regulated professions is contained in the OFC's *Ontario's Regulated Professions: Report on the 2007 Study of Registration Practices*.

2. BACKGROUND OF THE REGULATORY BODY

A. Legislation

The authority and limitations of the powers of the College of Optometrists of Ontario (COO) can be found in legislation including the Regulated Health Professions Act, 1991, the Health Professions Procedural Code, the Optometry Act and regulations.

The COO establishes the professional requirements that must be met before an optometrist can be registered in the province. The COO is entrusted with the responsibility of determining that the candidate has the knowledge, skills and judgment necessary to practise optometry according to standards set by the COO.

B. Protected Titles

“Optometrist” is the protected title regulated by the College of Optometrists of Ontario.

C. Definition of the Profession

The practice of optometry is the assessment of the eye and vision system and the diagnosis, treatment and prevention of disorders of refraction; sensory and oculomotor disorder and dysfunctions of the eye and vision system; and prescribed diseases.

The Canadian Association of Optometrists defines an optometrist as “an independent primary health care provider who specializes in the examination, diagnosis, treatment, management and prevention of disease and disorders of the visual system, the eye and associated structures as well as the diagnosis of ocular manifestations of systemic conditions.”

The main responsibilities of optometrists, as primary eye care providers, are:

- The examination of the human eye by any method (other than surgery), to diagnose, treat, and/or refer for treatment any abnormal condition of the eye, in cooperation with physicians and other health professionals
- The employment of instruments, procedures or agents to measure, examine or diagnose visual defects or abnormal conditions of the eye
- The prescribing, fitting and application of glasses, contact lenses or other devices to correct, relieve or treat the eye
- The prescription, supervision and management of therapy for the improvement/monitoring of visual health
- The referral of patients to other health practitioners as required.

D. Labour Market/Economic Trends

The COO does not track labour market trends for the profession. There is a trend toward optometrists practising in more than one location; the COO requires that optometrists who work in more than three locations must get Council approval.

E. New Developments Within the Profession

New requirements under the Health System Improvements Act, 2007 (Bill 171) related to greater public information and accessibility may lead to an increase in membership dues.

In addition, under the act, optometrists will be authorized to prescribe therapeutic pharmaceutical agents (TPAs). This change will improve access to vision services, reducing wait times for the treatment of certain eye conditions by permitting optometrists to prescribe selected drugs for conditions such as infections. In 2007, the COO Council approved a policy titled “Educational Requirements for Members to Prescribe Drugs,” designed to ensure that all members who prescribe TPAs are competent to do so.

New regulations regarding conflict of interest and professional misconduct and the expansion of working relationships between optometrists and opticians were submitted to the Ministry of Health and Long-Term Care late in 2007.

In the technology field, advancements are allowing optometrists to work more efficiently and delegate more tasks to assistants.

F. Staffing

The COO staff consists of 5.5 full-time employees. Three staff are involved in some stage of the registration process.

3. REGISTRATION PRACTICES

A. Registration Requirements and Application Process

To practise optometry in Ontario, applicants must hold a General Certificate of Registration or an Academic Certificate of Registration issued by the College of Optometrists of Ontario. If applicants have a full-time appointment to the faculty of the School of Optometry of the University of Waterloo or to a university or other optometric educational facility in Ontario approved by the COO and are required to practise optometry in the course of their employment, they must be members of the COO, holding a General Certificate of Registration or an Academic Certificate of Registration.

In order to obtain a General Certificate of Registration or an Academic Certificate of Registration, candidates must meet the following requirements:

- Academic Qualifications: See 3.d.
- Citizenship Status: Applicants must have Canadian citizenship, permanent residency or authorization under the Immigration and Refugee Protection Act (Canada) to engage in the practice of optometry. Although citizenship or residency is not required before applicants may write the Canadian Standard Assessment in Optometry (CSAO) exam, it is

recommended. In order for a certificate of registration to be issued and activated, citizenship or authorization documents must be valid.

- **Language Requirements:** Applicants must be able to speak and write in English or French with reasonable fluency.
- **Fees:** Applicants must pay the application, examination and certificate of registration fees.
- **Jurisprudence Exam:** Applicants must successfully complete the Ontario Jurisprudence Exam within one year after applying for registration (see 3.f).
- **Good Standing:** Applicants who have previously practised optometry must show that there are no findings or current allegations of professional misconduct, incompetence or incapacity against them. Applicants who have previously practised or are currently practising optometry or another regulated health profession must provide the COO with a letter of good standing from the jurisdiction where they practised. The letter must be dated no more than six months before an applicant's certificate of registration with the COO is issued and activated.
- **Police Report:** Applicant must not have been found guilty of a criminal offence in any jurisdiction or of an offence under the Controlled Drugs and Substances Act (Canada) or the Food and Drugs Act (Canada). Applicants are required to have a Canadian Police Information Centre (CPIC) report submitted to the COO. The CPIC report must be dated no more than six months before an applicant's certificate of registration is issued and activated.
- **Competence to Practise:** Applicants must demonstrate competence by one of the four paths outlined below.
 1. Successfully completing the Canadian Standard Assessment in Optometry (CSAO) exam less than three years before applying for registration.
 2. Successfully completing the CSAO exam more than three years before applying for registration, and in addition:
 - Providing at least 750 hours of direct optometric care to patients in the three years before applying for registration, and successfully undergoing an assessment of the required professional records by the Quality Assurance Committee, or
 - Successfully undergoing an evaluation of knowledge, skills and judgment by the Quality Assurance Committee.

3. For applicants currently authorized to practise optometry in another province or territory of Canada with a licence or certificate of registration first issued on or before July 1, 2001, and considered equivalent to a COO certificate by the Registration Committee:
 - Providing at least 750 hours of direct optometric care to patients in Canada in the three years before applying for registration with the COO, or
 - Successfully undergoing an assessment of the required professional records by the Quality Assurance Committee, or
 - Successfully undergoing an evaluation of knowledge, skills and judgment by the Quality Assurance Committee.
4. For applicants currently authorized to practise optometry in another province or territory of Canada with a licence or certificate of registration first issued after July 1, 2001, and considered equivalent to a COO certificate by the Registration Committee:
 - Successfully completing the CSAO exam less than three years before applying for registration from the COO, or
 - Successfully completing the CSAO exam more than three years before applying for registration from the COO, and providing at least 750 hours of direct optometric care to patients in Canada in the three years before applying for registration with the COO, or
 - Successfully completing the CSAO exam more than three years before applying for registration from the COO, and successfully undergoing an assessment of the required professional records by the Quality Assurance Committee, or
 - Successfully completing the CSAO exam more than three years before applying for registration from the COO, and successfully undergoing an evaluation of knowledge, skills and judgment by the Quality Assurance Committee.

B. Documentation Required from Internationally Trained Individuals

i. Standard Documentation

Registration requirements for a General Certificate of Registration or an Academic Certificate of Registration are the same for international graduates as for North American graduates. To assist international graduates in meeting the academic equivalency requirement for registration, the COO and the University of Waterloo School of Optometry have developed the International Optometric Bridging Program (see section 4).

ii. Options for Applicants with Unavailable/Destroyed Documents

Internationally trained applicants can describe their educational background and certification in a signed undertaking or declaration.

C. Credential Assessment (Third Party and/or Internal)

Internationally trained optometrists must take an Optometric Credential Assessment administered by the International Optometric Bridging Program at the University of Waterloo. There are four parts to the assessment:

- Academic Qualification Assessment (AQUA): The AQUA evaluates educational background to determine if it is similar to that of a Canadian-educated optometrist.
- Language Fluency: A standardized test of language fluency must be completed if the applicant's primary language for post-secondary work was not English.
- Prior Learning Assessment (PLA): The first part is a written, multiple-choice test of current knowledge of the practice of optometry; the second part is a half-day assessment of optometric clinical skill.
- Bridging Programs: The results of the AQUA and PLA will determine if the candidate is eligible for the bridging program, and if so, which bridging program stream the candidate will enter. Some candidates may not have "bridgeable gaps."

D. Academic/Program Requirements

Both the General Certificate of Registration and the Academic Certificate of Registration require one of the following:

- Successful completion of the course in optometry at the School of Optometry of the University of Waterloo (UWSO) and the award of the degree of doctor of optometry by the university
- Successful completion of a course of study outside Ontario which the Registration Committee of the COO deems to be the equivalent of the course at the UWSO and the award of a degree that the Registration Committee determines is comparable to the degree of doctor of optometry of the University of Waterloo
- For individuals who were educated at a school not accredited by the Accreditation Council on Optometric Education (ACOE), academic and prior learning assessment to determine if their training and degree are equivalent and comparable to that of a graduate from an ACOE-accredited school. The COO currently recognizes the evaluation process provided by the UWSO.

E. Work Experience Requirements

For applicants who hold a degree of doctor of optometry from an ACOE-accredited school or college, there are no work experience requirements. Practical experience is built into the optometry program at the University of Waterloo.

To enter the International Optometric Bridging Program, international candidates must be currently licensed or registered to practise optometry outside Canada and must have successfully completed either (a) two years of university undergraduate courses prior to entering an optometry school and a four-year optometry degree, or (b) a four-year optometry degree followed by two years of optometric work experience.¹

F. Examinations

i. Ontario Jurisprudence Exam

All applicants must successfully complete the Ontario Jurisprudence Exam within one year after applying for registration. Application to write the Jurisprudence Exam is made directly to the COO. A one-day seminar is offered to applicants on the day before the exam.

ii. Canadian Standard Assessment in Optometry Exam

Applicants must take the Canadian Standard Assessment in Optometry (CSAO) exam. To be eligible, applicants must provide valid documentation of one of the following qualifications:

- Graduation with a doctor of optometry degree from a program accredited by the Accreditation Council on Optometric Education (ACOE)
- Graduation with a doctor of optometry degree from a program accredited by the ACOE within 60 days of the date the applicant takes the CSAO exam
- Successful completion of the International Optometric Bridging Program at the University of Waterloo.

Canadian Examiners in Optometry (CEO) administers the CSAO exam. CEO assesses individuals' competence in the practice of optometry. The results from these assessments are used by provincial and territorial regulators in deciding whether an individual will be issued a licence or a certificate of registration to practise.

¹ These requirements will change in 2012.

The exam contains seven components and is offered in English or French. CEO offers an orientation to the four skills components of the exam on the day before they begin. Attendance at the orientation session is highly encouraged. This session provides an opportunity for candidates to become familiar with the examination facilities and procedures as well as to participate in a question-and-answer forum specific to these components.

After completing the CSAO, applicants must submit their results to the COO. If applicants successfully complete the CSAO exam before applying for registration in Ontario, they must submit a notarized copy of the results.

G. Language Requirements

An applicant for registration must be able to speak and write in English or French with reasonable fluency.

H. Fees

The following fees are subject to GST.

Fee	
Application fee, including Jurisprudence Seminar and Exam Fee	\$400
Certificate fee	\$25
Duplicate certificate fee:	
When ordered at the same time as the initial certificate	\$10
When ordered some time after ordering the initial certificate	\$25
Annual registration fee	\$750
Late penalty fee (application, membership renewal, Certificate of Authorization renewal)	\$50
Reinstatement fee (memberships)	\$150
Certificate of Authorization (Incorporation) application fee	\$500
Certificate of Authorization (Incorporation) certificate fee	\$25
Certificate of Authorization (Incorporation) annual renewal fee	\$250
Quality Assurance Assessment fee	\$1,500
Quality Assurance Evaluation fee	\$2,750
Letter of good standing	\$25

I. Third Parties

Name of Third Party	Relationship to Regulatory Body
Canadian Examiners in Optometry (CEO)	Administers the national entry-to-practice exam. Provides the Prior Learning Assessment of UWSO's assessment process for international graduates.
University of Waterloo School of Optometry (UWSO)	Administers and delivers the comprehensive assessment of international graduates and a bridging program.

J. Typical Length of the Registration Process

Applications for registration are open for two years from the date they are submitted to the COO. If an applicant has not completed the requirements for the issuance of a certificate of registration by the end of this period, a new application must be made.

K. Accredited Programs

The optometry programs recognized by the College of Optometrists of Ontario are North American programs accredited by the Accreditation Council on Optometric Education (ACOE). All schools of optometry in the United States, Canada and Puerto Rico are accredited. There are only two schools in Canada:

- University of Waterloo, School of Optometry, Waterloo, Ontario
- Université de Montréal, École d'Optométrie, Montreal (French only)

L. Internal Review/Appeal Process

If the Registrar proposes to refuse to register an applicant, the applicant has the right to appeal to the Registration Committee.

The Registration Committee is a statutory committee composed of one public member of Council and four professional members, one of whom is a member of Council. The committee is responsible for the entry-to-practice process of the profession in Ontario and some of the processes by which members maintain their registration over the course of their careers.

If applicants do not agree with the Registration Committee's decision, they have the right to appeal to the Health Professions Appeal and Review Board (HPARB).

Appeals related to the Canadian Standard Assessment in Optometry exam are handled by Canadian Examiners in Optometry, which administers the national entry-to-practice exam.

4. BRIDGING PROGRAMS

The International Optometric Bridging Program (IOBP) at the University of Waterloo School of Optometry (UWSO) consists of a comprehensive assessment process and orientation to practising optometry in Ontario.

The program is designed to provide optometrists educated outside Canada and the United States with a structured orientation to Canadian standards of optometric practice. The program provides all qualified applicants with opportunities to gain the critical language, academic and clinical skills necessary for registration in all provinces of Canada.

Once their academic credentials have been assessed as acceptable, applicants will move forward to a language assessment and a prior learning assessment to ascertain their current knowledge in optometry. The IOBP conducts the language assessment. The IOBP also offers language courses within the bridging programs.

Qualified applicants will then enter the month-long Bridging One program or a year-long structured academic program called Bridging Two. These programs are designed to prepare the applicants to move forward to the Canadian Standard Assessment in Optometry, the examination necessary for registration to practise optometry in Canada.

Placement within the IOBP is determined by an assessment of an individual's current learning in the profession of optometry. The assessment tool used by CEO for this purpose is the Indicator of Current Learning in Optometry (ICLO).²

² The Indicator of Current Learning in Optometry (ICLO) is a written assessment of optometric knowledge and its clinical application. The ICLO consists of multiple-choice questions developed by practising optometrists in accordance with the established architecture of knowledge and judgment that constitute professional competence as articulated by CEO on behalf of the profession of optometry in Canada (http://www.ceo-eco.org/home_competence.asp). The ICLO provides a reliable indication of the current level of knowledge held by an optometrist about current optometric clinical science and practice.

5. MUTUAL RECOGNITION AGREEMENTS

Ontario has mutual recognition agreements with all provinces and territories in Canada, except British Columbia.

6. APPLICANTS' INTERACTIONS WITH REGULATORY BODY

A. Nature and Frequency of Communication

All applicants receive regular correspondence regarding the status of their application.

B. Backlogs

There is no backlog in the registration process at this time.

C. Complaints Regarding the Registration Process

Complaints regarding the registration process will be directed to the Registrar's attention in the first instance. If the issue is purely an administrative matter, it would normally be dealt with at the staff level. If the matter relates to a policy issue, then it would normally be brought to the Registration Committee for a decision.

7. CHANGES SINCE THE 2005 SURVEY

The Ministry of Citizenship and Immigration conducted a survey in 2005 to collect information about occupational regulatory bodies in Ontario.

Since then, the COO has implemented numerous programs, services and supports for applicants. The COO has:

- Updated the application package and form for clarity and readability.
- Implemented policy clarifying the length of time an application is valid. The time period changed from three sittings of the CSAO exam to two years from the date the application is received by the COO.
- Developed a recommended sequence for completing registration requirements, so that applicants do not have to complete some requirements more than once (as might have

happened if, for example, a letter of good standing expired before all other requirements were met).

- Developed a policy with options for applicants who are unable to provide a letter of good standing from another jurisdiction.³
- Developed an updated outline for the Ontario Optometric Jurisprudence Seminar that indicates all of the information applicants will need to know for the exam, and where each piece of information may be found in the resource binder.
- Drafted an updated registration regulation that, if passed, will appropriately recognize IOBP graduates and would make Canadian citizenship, permanent residency or authorization to practise in Ontario an exemptible requirement.
- Entered into a letter of understanding with the University of Waterloo School of Optometry to ensure continuity of the International Optometric Bridging Program (IOBP) in the event that the school is no longer able to offer the program.

Since 2005, the University of Waterloo School of Optometry has developed an updated profession-specific information package for international candidates applying to the IOBP. The IOBP has updated and streamlined academic credentialing, and the language component was made more occupation-specific. The Bridging Two program was launched, and the Bridging One stream is becoming more targeted to the applicant's areas of weakness.

8. REGISTRATION INFORMATION AND STATISTICS

Definitions used in these tables:

Alternative class of licence: a class of licence that enables its holder to practise with limitations; additional registration requirements must be met in order to be fully licensed. Alternative classes of licence granted by the College of Optometrists of Ontario are specified under the tables below.

Applicant: a person who has applied to start the process for entry to the profession.

Applicant actively pursuing licensing: an applicant who had some contact with the COO within the year specified.

³ When applicants report that they cannot get a letter of good standing from a jurisdiction in which they were registered, the COO will ask for proof that a request was made. Acceptable proof would be, for example, a copy of a letter of request and a receipt for a registered letter or from a courier company. The COO would then ask applicants to provide a sworn statement or attestation that they were registered in the other jurisdiction and that they were not under investigation and had not been subject to discipline proceedings.

Inactive applicant: an applicant who had no contact with the COO within the year specified.

Member: a person who is currently able to use the protected title or professional designation “optometrist.”

Languages in which application information materials were available

Language	2005	2006	2007
English	Yes	Yes	Yes
French	No	No	No
Other(s)			

Countries where internationally educated applicants were initially trained in optometry

Applications Received	2005	2006	2007
Largest number	India	United Kingdom	United Kingdom
Second-largest number	Nigeria	Nigeria	Nigeria
Third-largest number	Iran	Iraq	India
Fourth-largest number	Colombia	Egypt	Iran
Fifth-largest number	China	Nicaragua	Cuba

Staff employed by the College of Optometrists of Ontario

Number of Staff	2005	2006	2007
Involved in registration process	2	2	2
Involved in appeals process	1	1	1

Jurisdiction where members were initially trained in optometry (before they were granted use of the protected title or professional designation in Ontario)

Members	Ontario	Other Canadian Provinces	USA	Other International	TOTAL
Total members	1,204	51	259	55	1,569
Non-practising members	7	1	3	0	11

Applicants processed by the College of Optometrists of Ontario in 2005

Jurisdiction where members were initially trained in optometry (before they were granted use of the protected title or professional designation in Ontario)						
In 2005 (Jan. 1 to Dec. 31)	Ontario	Other Canadian Provinces	USA	Other International	TOTAL	
New applications received	40	7	30	25	102	
Applicants actively pursuing licensing	51	10	46	30	137	
Inactive applicants	0	0	2	1	3	
Applicants who met all requirements and were authorized to become members but did not become members	1	0	1	0	2	
Applicants who became members	36	7	12	8	63	
Applicants who were authorized to receive an alternative class of licence ¹ but were not issued a licence	0	0	0	0	0	
Applicants who were issued an alternative class of licence ¹	0	0	0	0	0	

¹ Academic Certificate of Registration.

Applicants processed by the College of Optometrists of Ontario in 2006

Jurisdiction where members were initially trained in optometry (before they were granted use of the protected title or professional designation in Ontario)						
In 2006 (Jan. 1 to Dec. 31)	Ontario	Other Canadian Provinces	USA	Other International	TOTAL	
New applications received	35	3	28	15	81	
Applicants actively pursuing licensing	38	3	30	31	102	
Inactive applicants	0	0	1	0	1	
Applicants who met all requirements and were authorized to become members but did not become members	3	0	9	4	16	
Applicants who became members	38	4	23	11	76	
Applicants who were authorized to receive an alternative class of licence ¹ but were not issued a licence	0	0	0	0	0	
Applicants who were issued an alternative class of licence ¹	0	0	0	0	0	

¹ Academic Certificate of Registration.

Applicants processed by the College of Optometrists of Ontario in 2007

Jurisdiction where members were initially trained in optometry (before they were granted use of the protected title or professional designation in Ontario)						
In 2007 (Jan. 1 to Dec. 31)	Ontario	Other Canadian Provinces	USA	Other International	TOTAL	
New applications received	43	2	36	8	89	
Applicants actively pursuing licensing	50	2	54	27	133	
Inactive applicants	1	2	2	5	10	
Applicants who met all requirements and were authorized to become members but did not become members	5	0	7	1	13	
Applicants who became members	35	1	32	14	82	
Applicants who were authorized to receive an alternative class of licence ¹ but were not issued a licence	0	0	0	0	0	
Applicants who were issued an alternative class of licence ¹	0	0	1	1	2	

¹ Academic Certificate of Registration.

9. SOURCES

College of Optometrists of Ontario website. <http://collegeoptom.on.ca/>. Last accessed: February 26, 2008.

College of Optometrists of Ontario. Registration information package.

Representatives of the College of Optometrists of Ontario met with staff of the Office of the Fairness Commissioner on January 21, 2008, to provide further information for this study.

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