

BRIEFING NOTE

TO: Board of Directors

FROM: Registration Committee

DATE: June 5, 2023

SUBJECT: 8.1 Currency of Practice Policy

☒ For Decision

☐ For Information

☐ Monitoring Report

Purpose:

To review and approve the proposed new Currency of Practice Policy

Background:

The College of Opticians of Ontario (College) is currently seeking amendments to the Registration Regulation under the *Opticianry Act, 1991*. The [proposed amendments](#) were submitted to the Ministry of Health in June 2017 following extensive consultation with registrants, opticianry associations, educators, and industry stakeholders and are currently awaiting final approval.

The proposed regulatory amendments recognize that a prolonged absence from practice may result in reduced currency in knowledge, skill or judgment such that it could impact the quality and safety of service provided to the public. As such, under the new Regulation, opticians will be required to demonstrate currency in order to hold a certificate of registration as a Registered Optician. Currency means the optician has remained up to date with their skills and knowledge, based on recent practice experience.

In light of the upcoming changes to the Registration Regulation, it is necessary that a new policy be created to support the new regulatory requirement that registrants demonstrate currency on an ongoing basis.

The College is taking steps to ensure that the policy is ready by August 31, 2023, which is when the amendments to the Registration Regulation may be approved by the Ontario Government.

For Consideration:

The following materials have been appended for the Board's review and consideration:

1. A draft of the proposed Currency of Practice Policy – **Appendix A**
2. An environmental scan of practices of Ontario health regulatory bodies – **Appendix B**
3. Literature review – **Appendix C**

3. Stakeholder feedback received by the College – **Appendix D**

The Registration Committee met in April and May 2023 to develop the draft Currency of Practice Policy. Under the proposed policy, Registered Opticians will be required to declare their practice hours every year at annual renewal; those opticians who have engaged in at least 500 practice hours within the previous three-year period will be considered current. The proposed policy further sets out the types of activities that will qualify as practice hours and outlines the steps if the optician does not meet the currency requirements.

In its deliberations, the Registration Committee considered the results of an environmental scan of Ontario health regulatory bodies, a literature review, and stakeholder feedback regarding the proposed policy. A brief summary of this information follows.

Environmental Scan Results

Per request of the Registration Committee, staff conducted an environmental scan of currency requirements amongst other Ontario health profession regulators. Based on an environmental scan of other health regulatory colleges, it was found that:

- Currency hours typically range between 500 and 1,500 hours over a set period of years, with three years being the standard.
- Registrants are typically required to self-declare their hours at the time of their initial application for a certificate of registration and during the annual renewal process.
- Registrants who fail to demonstrate currency are typically required to undergo an upgrading program, which may include:
 - a competency assessment
 - completion of an examination;
 - a refresher course;
 - a demonstration of a range of professional development/continuing competence activities that address the national competency standards.

Literature Review

To allow for evidence-informed decision-making, staff conducted a literature review to gather empirical evidence concerning skill retention and decay in healthcare. The review led to the following findings:

- Skills have been shown to decline over periods ranging from six to 18 months.
- A steeper decline is noted at the outset and a more gradual decline as time passes.
- Keeping in touch with peers and staying engaged in professional development can mitigate skill atrophy.
- A higher level of learning and proficiency prior to the period of non-practice leads to a higher level of retained skill.
- Two or three years out of practice should signify a need for reassessment and retraining prior to a full return.

- Self-assessment of competence is not objective and is insufficient to determine how skills deterioration should be addressed.

Stakeholder Feedback

The draft Currency of Practice Policy was circulated by e-blast to registrants on April 14, 2023. Individuals were also invited to participate in the survey via social media. Links to the proposed amendment, background information, and survey were posted on the College's website. Individuals were invited to provide feedback or comments. A separate invitation was sent to the Ontario Opticians Association and the office of the Ontario Fairness Commissioner.

The survey closed on May 14, 2023 and received 59 responses. Of those responses:

- 49 (83.05%) anticipated being able to meet the currency requirement on an ongoing basis.
- 2 (3.39%) anticipated being unable to meet the currency requirement on an ongoing basis.
- 8 (13.56%) were unsure about being able to meet the currency requirements.

The majority of survey respondents agreed with the proposed activities that will count as practice hours under the policy. Upon review of suggestions made by the stakeholders, the Committee considered the feedback and included the following additional qualifying activities:

- completing advanced learning courses in opticianry or optical sciences at an educational institution accredited by the College;
- Presenting continuing education activities that have been accredited by the College;
- engaging in sales or marketing of eyewear or optical appliances that are direct to patients.

The committee also made changes to the policy to clarify that Registered Opticians who declare less than 500 practice hours over a three-year period will be given an opportunity to submit additional activities for consideration by the Registration Committee. The Registration Committee will then determine whether the additional activities qualify as "practice hours" within the context of the policy.

Public Interest Considerations

A requirement for opticians to demonstrate currency on an ongoing basis was built into the updated Registration Regulation because it was recognized that this type of requirement is recognized as being in the public interest. The Registration Committee considered that the proposed policy ought to set the minimum currency requirement at a level that would achieve this goal while also not creating unnecessary barriers for opticians who are not practising on a full-time basis. In the Committee's view, the proposed policy, which sets the minimum requirement at 500 hours over a three-year period, will strike this balance.

Diversity, Equity, and Inclusion Considerations

The Registration Committee considered the impact of the proposed policy on opticians who may have different individual needs and/or circumstances. The Committee noted that setting the currency requirement at 500 hours over a three-year period would account for opticians who take leaves of

absence or who may be working part-time. Additionally, the proposed policy builds in opportunities for the Registration Committee to consider one's individual circumstances.

Recommendation/Action Required:

The Registration Committee recommends that the Board approve the proposed Currency of Practice Policy, as set out in Appendix A,

REGISTRATION POLICY

Currency of Practice Policy

Introduction

Practising opticians are required to ensure that their knowledge and skills remain up to date, or current. This policy describes the minimum requirements for currency of practice experience for opticians who hold a certificate of registration as a Registered Optician.

Policy

Definition of Currency

In order to hold a certificate of registration as a Registered Optician, opticians are required to demonstrate that they are **current**.¹

“Currency” means a certain amount of recent practice experience that establishes that the optician’s knowledge and skills are up to date. Currency is a way to assess whether the optician will practice safely, competently and ethically on an ongoing basis.

Currency requirements for Registered Opticians

To be considered current, a Registered Optician must have engaged in at least 500 practice hours within the previous 3-year period.

The following activities will count as “practice hours” for the purposes of this policy:

1. Dispensing of eyeglasses, contact lenses and subnormal vision devices, and related duties (e.g. record keeping, laboratory work, cleaning and disinfecting eyewear, optical appliances, tools or equipment).
2. Teaching opticianry at an accredited opticianry program in Canada.
3. Supervising student and/or intern opticians in accordance with the Student/Intern Supervision Policy and/or the Contact Lens Mentor Policy.
4. Directly supervising, managing or assuring the quality of services of opticianry staff engaged in dispensing.
5. Completing advanced learning courses (including certificate programs) in opticianry or optical sciences at an educational institution accredited by the College (see [website](#) for a list of institutions).
6. Completing continuing education activities accredited by the College.
7. Presenting continuing education activities that have been accredited by the College (presentations that are delivered on multiple occasions may only be counted once).

¹ See section 5(3)1

8. Completing up to a maximum of 4 hours of self-directed continuing education activities annually.

The following activities do NOT count as “practice hours” for the purposes of this policy:

1. Engaging in sales or marketing of eyewear or optical appliances, other than sales or marketing that is direct to patients.
2. Work in a dispensary that is not related to opticianry services (e.g. human resources, information technology, risk management, business administration).
3. Supervision of staff who are not providing opticianry services or engaging in dispensing (e.g. supervision of IT staff or reception staff).

How currency is monitored

Registered opticians must declare at annual renewal the number of practice hours that they engaged in during the previous calendar year. To be considered current, the total number of practice hours reported over any three-year period must be at least 500.

If a registrant declares less than 500 practice hours in the Registrant Portal over a three-year period, they will be given an opportunity to submit additional activities for consideration by the Registration Committee. The Registration Committee will determine whether the additional activities qualify as “practice hours” within the meaning of the policy. The Registration Committee’s decision is final and is not subject to appeal.

Opticians who cannot demonstrate currency

Registrants who have not engaged in at least 500 practice hours within the previous 3 years will have the following options:

1. Complete a refresher program approved by the Registration Committee. The refresher program will need to be completed within 6 months from the date the registrant is notified by the College that they do not meet the currency requirements. Registrants who do not complete the refresher program by the deadline may be referred to the Quality Assurance Committee.
2. Change their registration status to Inactive. Opticians in the Inactive Class are not entitled to practise opticianry or use the title Registered Optician. Inactive opticians may be re-issued a certificate as a Registered Optician if they meet the requirements set out in the Reinstatement and Changing from Inactive to Active Practice Policy.
3. Resign their registration with the College. Opticians who resign their registration will no longer be permitted to practise opticianry or use the title Registered Optician. In order to return to practice following resignation, they would be required to re-apply to the College as a new applicant and meet the registration requirements in place at the time of their re-application. For more information see the Resignation Policy.

APPENDIX B

Ontario Health Regulators Currency Requirements

Governing Body	Practice Hour Requirements Y/N	Currency Requirements	Qualified Activities
College of Audiologists and Speech-Language Pathologists of Ontario	Yes	750 hours of patient care or related work, or any combination of them, in the profession for which the member holds a general certificate of registration, during every three-year period, beginning on the day that the member is issued a general certificate of registration.	Direct patient care, supervised patient care and related work. More information can be found in Annex 1.
College of Chiropodists of Ontario	Yes	360 practice hours within the scope of practice of the profession in the two years immediately preceding the date of application or renewal.	Practice hours must include direct, hands-on, clinical care of patients within the scope of practice of the profession and includes charting the care provided contemporaneously. More information can be found in the Declaring Clinical Practice Hours Policy .
College of Chiropractors of Ontario	No	Members provide a declaration within the annual membership renewal. The College relies on self-declaration in determining whether a registrant meets ongoing requirements. The College's Quality Assurance Program also gives the College a means of determining whether registrants have practiced at least three months within the last two years – this would become apparent during random practice assessments.	-
College of Dental Hygienists of Ontario	No	-	-
College of Dental Technologists of Ontario	Yes	1300 experiential hours in dental technology practice within the 36 months prior to application.	Experiential hours can be gained through education/training programs, work experiences and volunteering and may be completed in any country.
College of Denturists of Ontario	Yes*	Must meet one of the following requirements in the three years preceding the current registration renewal: <ul style="list-style-type: none"> • 1500 practical hours of denturism; • Successfully completed the Qualifying Examination; • Successfully completed any courses approved by the Council; or • Taught denturism for a period of at least twelve months at George Brown College of Applied Arts and Technology or any other institution that, in the opinion of the Registration Committee, issues an equivalent diploma or degree. 	Engaged in the practice of denturism, including the assessment of arches missing some or all teeth; and design, construction, repair, alteration, ordering and fitting of removable dentures.
College of Dietitians of Ontario	Yes	500 practical hours over the preceding three years, asked at annual renewal	Dietetic practice can be in a paid or unpaid capacity (e.g., volunteer work) for which members use food & nutrition-specific knowledge, skills and judgment. More information can be found in the Definition of Practising Dietetics Policy .

College of Homeopaths	Yes	a minimum of 750 hours during every three-year period, with the first three-year period beginning on the day that the member is issued a full certificate of registration	Practicing the profession of homeopathy including clinical hours, non clinical hours, academic research, employment related teaching, supervision and administration. More information can be found in Full Class, Breakdown of 750-Hours Policy .
College of Kinesiologists of Ontario	Yes	1500 practical hours during every three-year period where the first three-year period begins on the first September 1 following the day that the member is issued a general certificate of registration	Practicing the profession of kinesiology – please refer to the Scope of Practice for more information.
College of Massage Therapists of Ontario	Yes*	500 hours of direct client care in the previous three years or completed a Refresher Course in the previous 15 months	Direct client care includes: massage therapy services provided on behalf of a client, and/or supervision of a massage therapist or massage therapy student who is providing massage therapy services on behalf of a client. Direct client care activities include: assessment of the soft tissue and joints; recommending, developing, or implementing a treatment plan based on the assessment of the client's needs; treatment of the soft tissue and joints; conducting or supervising research in Massage Therapy that involves the assessment or treatment of clients with soft tissue or joint disorders; overseeing and evaluating Massage Therapists or Massage Therapy students in a clinical setting. (Policy: Direct Client Care)
College of Midwives of Ontario	Yes*	Provide midwifery care: <ul style="list-style-type: none"> Over a one-year period, to at least 20 women Over a two-year period, to at least 40 women A member who complies with either of the above to requirements in the first two consecutive years after registration in Ontario may elect to satisfy the requirement for active practice by, in any subsequent five-year period, providing midwifery care to at least 100 women 	Includes performing out-of-hospital and hospital births. Further information can be found in the Active Practice Requirement Policy .
College of Naturopaths	Yes	750 practical hours over any three-year period	Direct patient care (consultation/visit, assessment, treatment) and may include any of the following additional activities, or a combination thereof: direct patient care (consultation/visit, assessment, treatment); Research related to managing patient care (a specific case); Clinical supervision involving direct patient care; Clinical education involving patient interaction or provision of professional services while teaching; Communication with colleagues regarding case management.; or Mentoring.
College of Nurses of Ontario	Yes*	Must have practiced nursing within the past three years. No minimum number of hours required.	Scope of practice depends on classification (RN, RNP, NP). The College is currently working on expanding the Scope of Practice for each classification.
College of Occupational Therapists of Ontario	Yes*	600 hours of service within the scope of practice of the profession in the previous three years, or	Practice hours may include clinical and/or non-clinical work as outlined in the Essential Competencies of Practice For

		Have successfully completed within the previous 18 months a refresher program accepted by the Registration Committee.	Occupational Therapists in Canada . The College considers hours spent in other activities that support continuing competence and the delivery of safe, effective and ethical care. These unpaid professional activity hours (such as professional development or participation in other unpaid professional activities) cannot be more than 25% of the occupational therapists declared hours. However, practice hours and unpaid professional activity hours will only be accepted if they were obtained while the individual held a certificate of registration to practise as an occupational therapist.
College of Optometrists of Ontario	Yes	750 direct patient contact hours in every three-year rolling period.	Communicating a diagnosis, applying a prescribed form of energy (prescribing drugs designated in the regulation), and prescribing or dispensing, for vision or eye problems, subnormal vision devices, contact lenses or eye glasses.
College of Registered Psychotherapists	Yes	750 currency hours of broadly defined activities related to psychotherapy on a rolling three-year basis	Currency hours include a broad range of professional activities related to the practise of psychotherapy, such as: direct client work; record-keeping and preparation in relation to direct client work; professional development in psychotherapy; engaging in clinical supervision as a supervisee; conducting research or writing in the field of psychotherapy; supervising; teaching; managing; consulting; and other professional activities that impact the practice of psychotherapy.
College of Physiotherapists of Ontario	Yes	1200 practice hours or the Physiotherapy Competency Exam (PCE) within the previous five years	Physiotherapy Practice includes employment or other activities resulting from the possession of physiotherapy credentials and experience. Practice hours include worked hours that are paid and professional activity hours. Worked Hours include hours of practice in clinical settings, consultation, research, administration, academia, and sales. It is not necessary to have the job title of Physiotherapist/ Physical Therapist. Professional Activity Hours include hours of volunteer activity which require the use of physiotherapy theory and knowledge, continuing education hours and/or participation in the physiotherapy professional/ regulatory organizations (The College, OPA, CPA, Canadian Alliance of Physiotherapy Regulators (CAPR)). No more than 30 professional activity hours may be counted toward total practice hours each year.
Ontario College of Pharmacists	Yes	A minimum of 600 hours in patient care over the previous three years	Includes activities with individual patients as well as with patient populations which can be distilled to the level of providing individual patient care. Patient care involves any of the following: providing pharmacy services, compounding, dispensing, prescribing and having custody of drugs, providing health care aids and devices, providing information and education, and promoting health, prevention and treatment of disease. More information can be found in Annex 2.

Annex 1 – College of Audiologists and Speech-Language Pathologists of Ontario

Patient Care includes direct care and supervision of direct care.

Direct patient care includes:

- Assessment of the audiovestibular, communication or swallowing abilities and needs of the patient.
- Recommending, developing or implementing intervention programs based on the patients' abilities and needs.
- Counseling and consulting with the families /caregivers and/or other parties or individuals directly associated with the patient.
- Other patient intervention activities such as discharge, referrals, follow-up, report writing, case conferences.
- Conducting research involving intervention in audiology or speech-language pathology that involve direct patient interactions

Supervision of direct patient care includes:

- Overseeing and evaluating the clinical work of audiologists or speech-language pathologists (e.g., conducts performance evaluations or case reviews, assesses written reports, monitors professional standards).
- Determining, on professional grounds, whether an individual patient should receive or be discharged from audiology or speech-language pathology services.
- Supervising research involving intervention in audiology or speech-language pathology that involve direct patient interactions.

Related Work includes:

- Making decisions on the organization and delivery of clinical services in audiology or speech-language pathology.
- Educating audiologists or speech-language pathologists concerning approaches, services, technologies, or products that may be employed in the intervention of patients with communication disorders.
- The administration for professional organizations where the registrant sets or maintains professional standards of practice for audiologists or speech-language pathologists.
- Conducting or supervising research involving intervention in audiology or speech-language pathology that does not involve direct patient interactions.
- Teaching audiology and/or speech-language pathology students, courses that involve the intervention of patients with communication disorders.
- Overseeing clinical practicums that involve discussion of case management, when direct clinical supervision is not involved.

Definition of Intervention:

- Intervention includes screening, assessment, treatment (direct and indirect) management, consultation, education and counselling.

Annex 2 – Ontario College of Pharmacists

Patient Care Activities

There are a number of activities which the College considers as patient care activities. These include activities with individual patients as well as with patient populations which can be distilled to the level of providing individual patient care.

With this in mind, patient care involves any of the following:

- Providing pharmacy services to individual patients or their advocate. In addition to the traditional community and hospital pharmacist's patient-facing activities, this may include:
 - Medication incident/ADR reporting where an assessment is undertaken for individual patients
 - Individual patient assessment of sentinel events
- Compounding, dispensing, prescribing and having custody of drugs
- Providing health care aids and devices to assist individual patients or their advocate
- Providing information and education related to the use of drugs, health care aids or devices to individual patients or their advocate considered within that patient's circle of care
- Promoting health, prevention and treatment of disease, disorders and dysfunctions through monitoring and management of medication therapy for individual patients

Source: <https://www.ocpinfo.com/registration/two-part-register/>

APPENDIX C

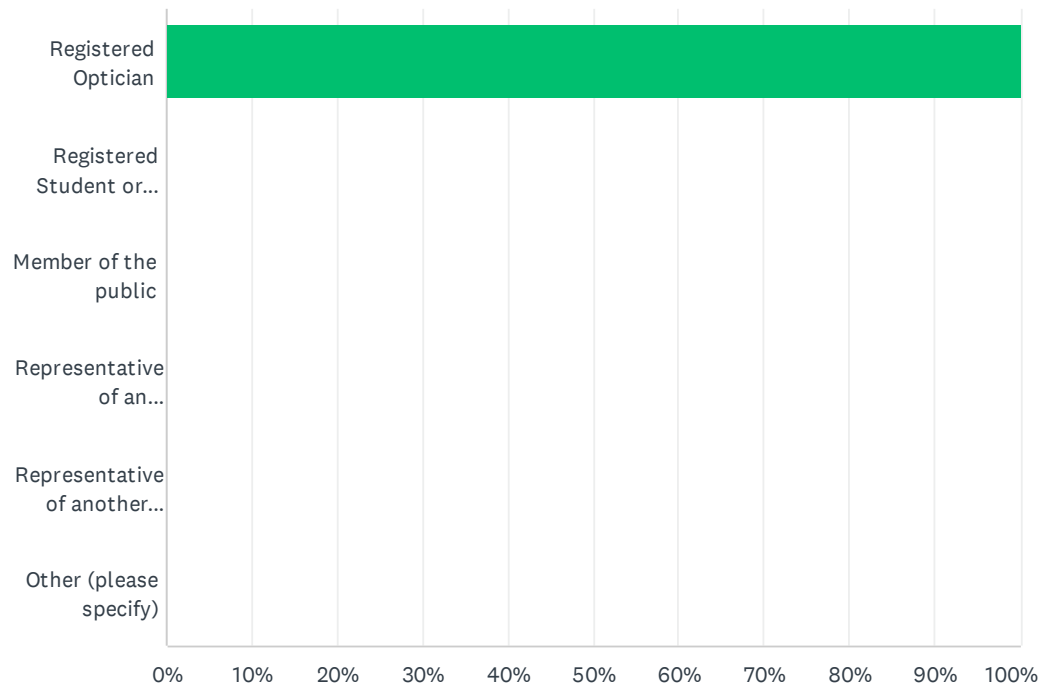
Empirical Evidence

Article Name	Information Obtained from Article
<p>Custers. (2010). Long-term retention of basic science knowledge: a review study. <i>Advances in Health Sciences Education: Theory and Practice</i>, 15(1), 109–128. https://doi.org/10.1007/s10459-008-9101-y</p>	<ul style="list-style-type: none"> • The results of the review, in the general educational domain as well as in medical education, suggest that approximately two-third to three-fourth of knowledge will be retained after one year, with a further decrease to slightly below fifty percent in the next year. • By the end of the 1960s, Dornhorst and Hunter (1967, pp. 666–667) joined the choir by noticing that few students begin clinical work with “any broad understanding of human structure and function,” and that many of them seem to have forgotten their preclinical work “amazingly quickly.” • Most studies report relatively large losses for short retention intervals (months), which accumulate, but level off, for longer retention intervals (years). • A few studies report large losses over the course of less than one year. • According to Bahrack (1979, 1984) and Conway et al. (1991), the knowledge should be acquired over an extended period in a cycle of repeated relearnings or rehearsals. That is, the number of courses an individual has taken in a particular subject is a much more important determinant of knowledge maintenance than a high grade received in a single course
<p>Hamilton, R. (2005). Nurses’ knowledge and skill retention following cardiopulmonary resuscitation training: a review of the literature. <i>Journal of Advanced Nursing</i>, 51(3), 288–297. https://doi.org/10.1111/j.1365-2648.2005.03491.x</p>	<ul style="list-style-type: none"> • The research suggests that resuscitation training should be carried out at least every 3–6 months to prevent deterioration of the skills and knowledge
<p>Arthur Jr, Bennett Jr, W., Stanush, P. L., & McNelly, T. L. (1998). Factors That Influence Skill Decay and Retention: A Quantitative Review and Analysis. <i>Human Performance</i>, 11(1), 57–101. https://doi.org/10.1207/s15327043hup1101_3</p>	<ul style="list-style-type: none"> • Physical, natural, and speed-based tasks were less susceptible to skill loss than cognitive, artificial, and accuracy-based tasks • Skill decay is particularly salient and problematic in situations where individuals receive initial training on knowledge and skills that they may not be required to use or exercise for extended periods of time • The effect of progressive knowledge or skill deterioration when knowledge and skills are not used or exercised for extended periods of time is a fairly robust phenomenon • The results of the meta-analysis to test the first research objective, which are presented in Table 3, indicate that there is an increase in the amount of skill decay as the length of the nonpractice interval increases. • After more than 365 days of nonuse or nonpractice, the average participant was performing at less than 92% of their performance level before the nonpractice interval •

<p>Yang, Yen, Z.-S., McGowan, J. E., Chen, H. C., Chiang, W.-C., Mancini, M. E., Soar, J., Lai, M.-S., & Ma, M. H.-M. (2012). A systematic review of retention of adult advanced life support knowledge and skills in healthcare providers. <i>Resuscitation</i>, 83(9), 1055–1060. https://doi.org/10.1016/j.resuscitation.2012.02.027</p>	<ul style="list-style-type: none"> Two studies noted retention of knowledge at 18 months and up to 2 years, and one reported skills retention at 3 months. Clinical experience, either prior to or after the courses, has a positive impact on retention of knowledge and skills. <p>The available evidence suggests that Advanced Life Support knowledge and skills decay by 6 months to 1 year after training and that skills decay faster than knowledge</p>
<p>Weaver, Newman-Toker, D. E., & Rosen, M. A. (2012). Reducing cognitive skill decay and diagnostic error: Theory-based practices for continuing education in health care. <i>The Journal of Continuing Education in the Health Professions</i>, 32(4), 269–278. https://doi.org/10.1002/chp.21155</p>	<ul style="list-style-type: none"> This work suggests that continuing education (CE) may play a critical role in mitigating and managing cognitive skill decay. The human performance literature defines skill decay as loss or decline in the quality of acquired knowledge or skills over time due to nonpractice and nonuse. Models of training transfer emphasize that learning and retention are influenced by characteristics of the individual trainee (eg, ability, motivation to learn and to use skills on the job), training design, and the work environment (eg, opportunities to use trained skills in daily practice)
<p>Oates, Jennifer L. (2014). Skills Fade: A review of the evidence that clinical and professional skills fade during time out of practice, and of how skills fade may be measured or remediated. <i>General Medical Council</i></p>	<ul style="list-style-type: none"> The theoretical basis for the understanding of skills retention and skills fade comes from cognitive psychology and some studies have measured skill retention using experiments involving volunteers There is substantial evidence that time out of practice does impact the individual's skills. Skills have been shown to decline over periods ranging from six to 18 months, according to a curve, with a steeper decline at the outset and a more gradual decline as time passes Skills fade depends on the following factors: <ul style="list-style-type: none"> Organizational: Skills fade may be mitigated by staying in touch with peers and staying aware of recent developments Job or task <ul style="list-style-type: none"> Particular skills fade at different rates Skills fade faster than knowledge Fine motor skills fade more than other tasks Training or assessment: Skills fade more if there is no opportunity to practise them between trainings (e.g., Individual factors:

Q1 Please indicate if you are a :

Answered: 59 Skipped: 0

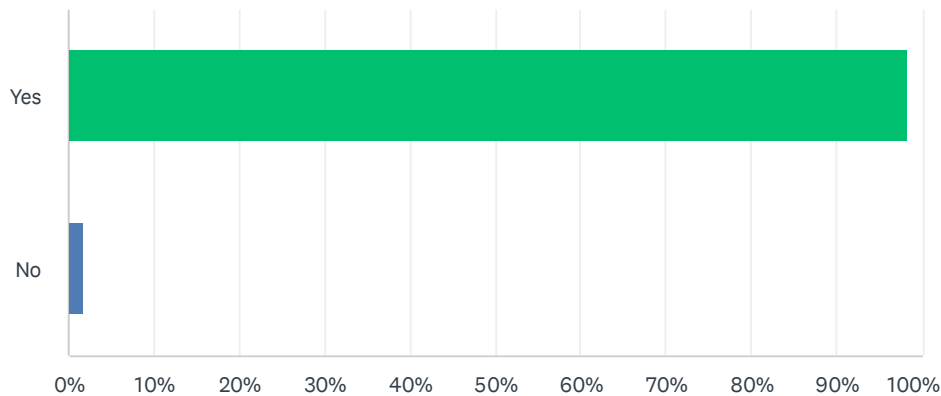


ANSWER CHOICES	RESPONSES	
Registered Optician	100.00%	59
Registered Student or Intern Optician	0.00%	0
Member of the public	0.00%	0
Representative of an opticianry association	0.00%	0
Representative of another regulatory body	0.00%	0
Other (please specify)	0.00%	0
TOTAL		59

#	OTHER (PLEASE SPECIFY)	DATE
	There are no responses.	

Q2 Do you hold a certificate of registration as a Registered Optician that is current and active (i.e. you are currently entitled to practice opticianry in Ontario)?

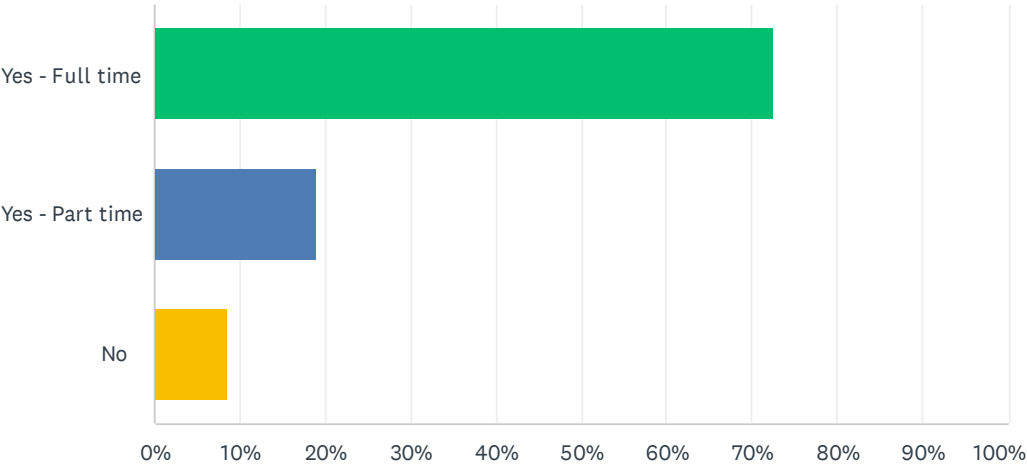
Answered: 59 Skipped: 0



ANSWER CHOICES		RESPONSES	
Yes		98.31%	58
No		1.69%	1
TOTAL			59

Q3 Are you currently practising opticianry?

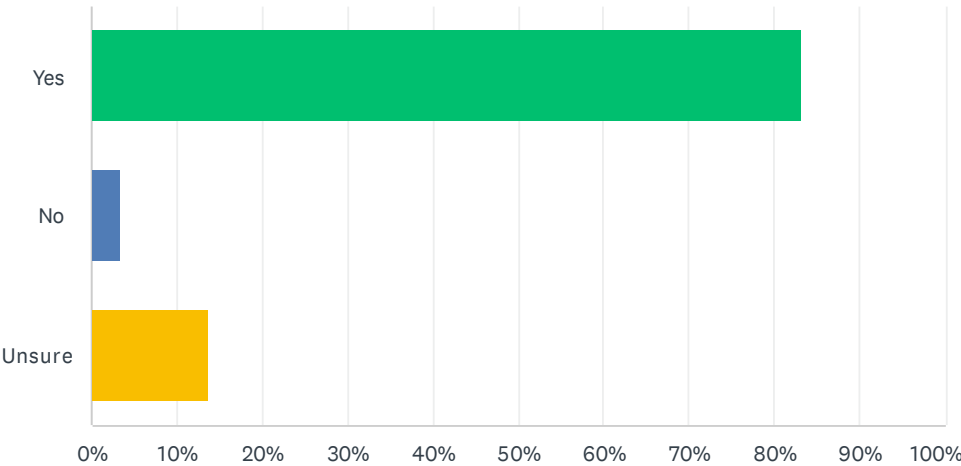
Answered: 58 Skipped: 1



ANSWER CHOICES		RESPONSES	
Yes - Full time		72.41%	42
Yes - Part time		18.97%	11
No		8.62%	5
TOTAL			58

Q4 The proposed Currency of Practice Policy will require opticians to demonstrate that they have practiced for at least 500 hours over the last three-year period in order to continue holding a certificate of registration as a Registered Optician. Do you anticipate being able to meet this requirement on an ongoing basis?

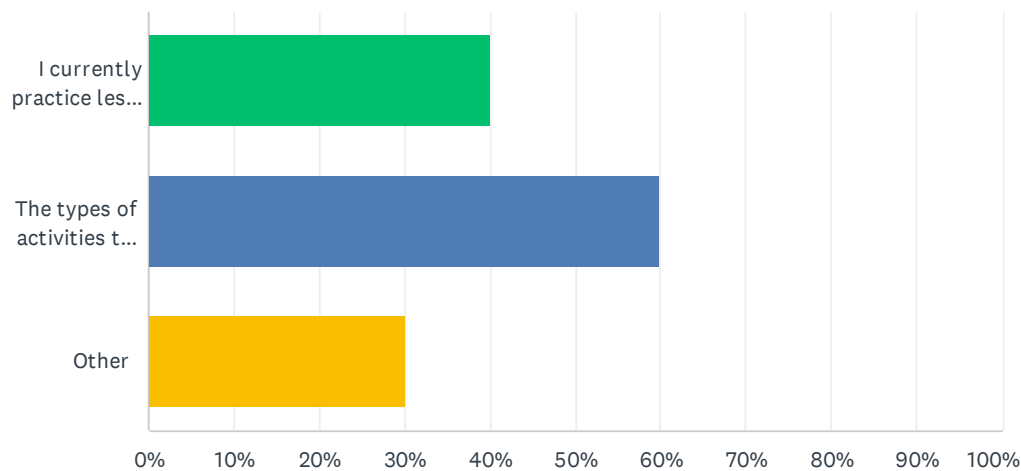
Answered: 59 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	83.05%	49
No	3.39%	2
Unsure	13.56%	8
TOTAL		59

Q5 What challenges do you anticipate facing in meeting this requirement?

Answered: 10 Skipped: 49



ANSWER CHOICES	RESPONSES	
I currently practice less than 500 hours in a typical 3-year period	40.00%	4
The types of activities that will count as “practice hours” don’t include the opticianry work that I do	60.00%	6
Other	30.00%	3
Total Respondents: 10		

#	PLEASE SPECIFY:	DATE
1	I disagree with the requirement of having 500 practice hours within the previous 3-year period as a prerequisite for being a registered optician. This requirement seems arbitrary without any empirical evidence to support its validity and relevance and does not reflect any actual needs of the patients. It emphasizes the “quantity” of practice hours over the “quality” of work that counts. While I agree with the general activities that count, I believe this topic also warrants more thoughts and discussion. I doubt how record keeping, cleaning and disinfecting eyewear, optical appliances, tools or equipment would make a person competent to be a registered optician. These activities, while essential and routine, are so basic that they should not count towards the knowledge, skills and abilities that are vital for providing quality eye care services to the public. Would an optician with 500 hours of cleaning and disinfecting eyewear be more qualified than another with 499 hours of supervising or teaching? Should the public have confidence on someone with 4 hours of self-directed continuing education activities over 3 years?	5/14/2023 1:38 PM
2	How much of each activity can be completed to be considered “current”? Can hours I dispense be counted in addition to hours that I spend supervising a student or intern., for example I work 16 hours a week and supervise a student 8 hours, does this count a 24 hours? What if I don’t dispense at all but do some of the other activities except supervise a student? Conducting or supervising research in Opticianry should be included in “practice hours” The policy is not very clear.	5/11/2023 8:54 AM
3	I currently work at Riverside Lab Optical in Ottawa, my job title is classified as Senior technical customer service/licensed optician, however, I work with a lensometer daily, I take all the measurements for all the staff needing glasses, as I am the only optician on site. I advise the clients on what lenses to use, what indices, and troubleshoot daily just as you would do with the general public. I have obtained more knowledge on products and their performance	5/10/2023 6:18 PM

Registrant and Stakeholder Consultation: Currency of Practice Policy

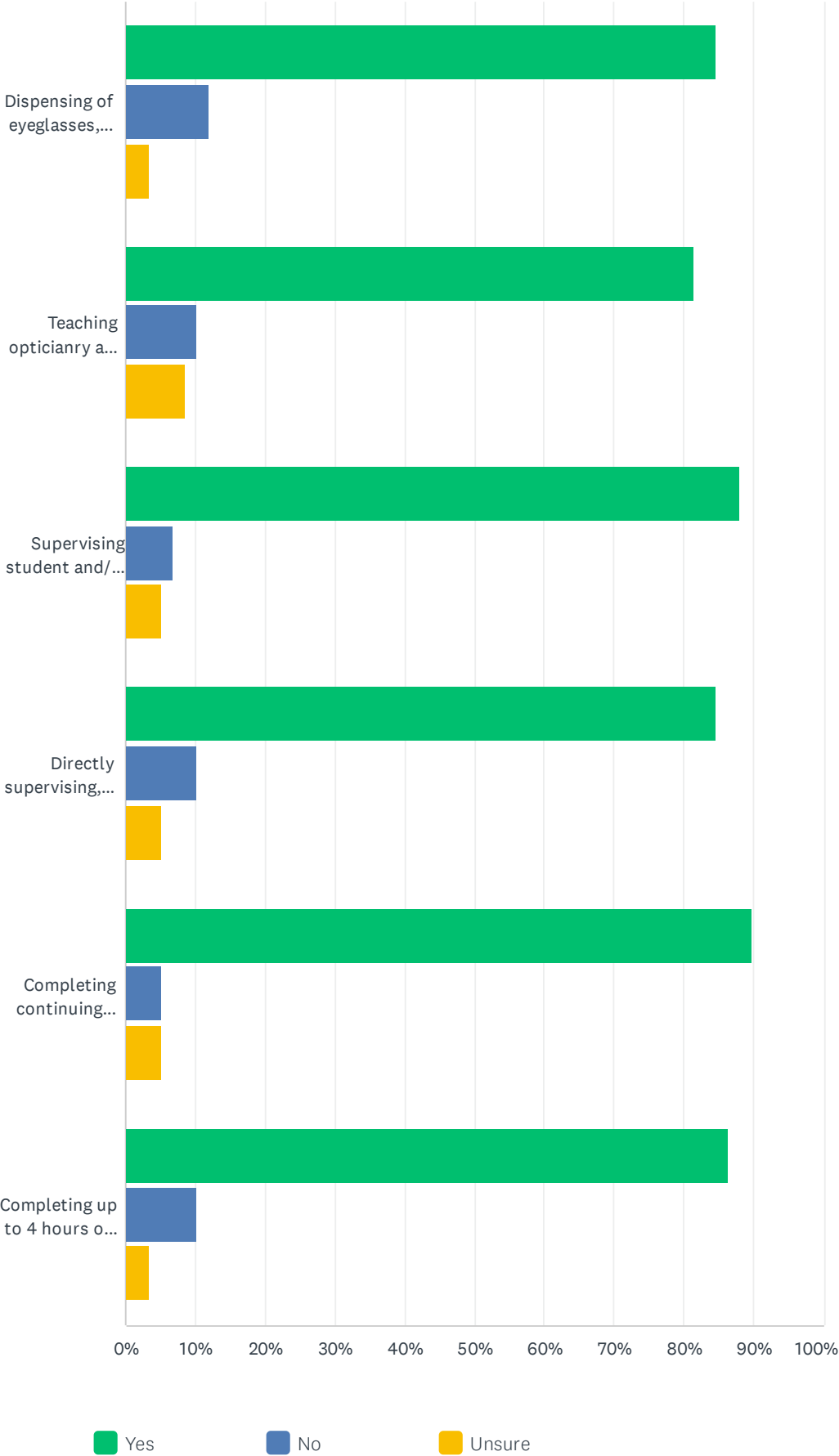
that I ever had working in the industry. I have worked in optics for 23 years, and have been a licensed optician for 7 of those 23 years. I believe that at the Lab there should be opticians available to fully understand the products and be able to advise other opticians from using the wrong products, base curves, indices, and lens colors. I have worked in opticals and optometry offices and I truly believe licensed opticians should be readily available at Optical labs. I believe this position should most definitely be included as opticianry "practice hours". This is vital for our industry to thrive in an ever changing market.

4	There is no indication of how many hours of each of the other activities is required to remain current or if there is a maximum in each area	5/8/2023 9:54 PM
5	I work full time in contact lens manufacturing, design, consultation and keeping up to date with recent trends in fitting. As these do not meet your very restrictive requirements I may not meet your criteria. I also fit highly advanced lenses on patients who have special needs, they will be deprived of my expertise. Some of these patients have been with me for many years. As a regulatory body you should spend more time on upgrading the profession with advanced lectures on new technology to opticians who have shown their interest in progressing their abilities.	5/4/2023 3:28 PM
6	I currently do not do Opticianry work but I keep up with my CE courses and do my own individual learning beyond the scope of non accredited hours.	4/14/2023 5:16 PM
7	The scope of practice for opticians is changing where opticians are advancing their careers in corporate management roles and other sectors of this industry that does not allow them to have access to practice hours. Opticians are already one of the highest paying registrants to a regulatory body with a very comprehensive annual CE portfolio criteria. I believe that practice hours may limit an optician's ability to venture and be successful in different parts of vision care industry. I am optician who recently started working in the manufacturing sector as an account manager which makes it difficult for me personally to directly practice opticianry.	4/14/2023 2:07 PM
8	It is completely unclear how the activities that will count as practice hours will be calculated. Are these "practice hours" counted hour for hour? What if I supervise a student during my working hours, is that time now doubled? What if I manage staff and supervise students during my working hours?	4/14/2023 1:50 PM

Q6 Do you agree with the list of activities that will count as practice hours under the proposed Policy?

Answered: 59 Skipped: 0

Registrant and Stakeholder Consultation: Currency of Practice Policy

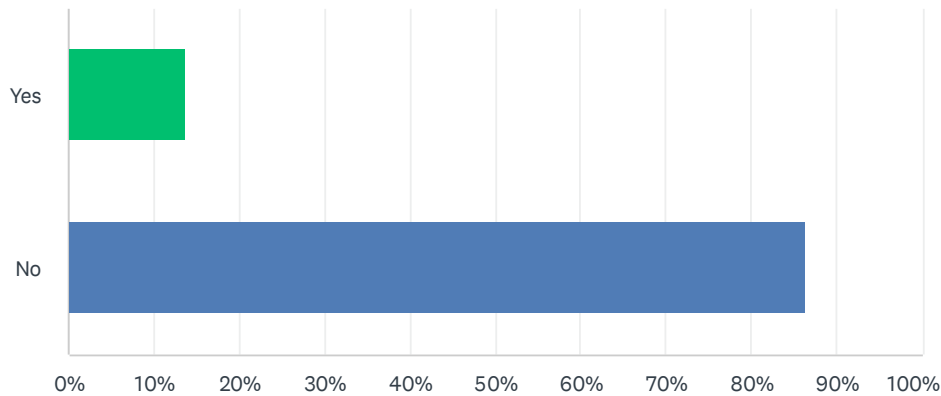


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	YES	NO	UNSURE	TOTAL
Dispensing of eyeglasses, contact lenses and subnormal vision devices, and related duties (e.g. record keeping, laboratory work, cleaning and disinfecting eyewear, optical appliances, tools or equipment)	84.75% 50	11.86% 7	3.39% 2	59
Teaching opticianry at an accredited opticianry program in Canada	81.36% 48	10.17% 6	8.47% 5	59
Supervising student and/or intern opticians in accordance with the Student/Intern Supervision Policy and/or the Contact Lens Mentor Policy	88.14% 52	6.78% 4	5.08% 3	59
Directly supervising, managing or assuring the quality of services of opticianry staff engaged in dispensing	84.75% 50	10.17% 6	5.08% 3	59
Completing continuing education activities accredited by the College	89.83% 53	5.08% 3	5.08% 3	59
Completing up to 4 hours of self-directed continuing education activities	86.44% 51	10.17% 6	3.39% 2	59

Q7 Are there any other activities that should be included on the list?

Answered: 59 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	13.56%	8
No	86.44%	51
TOTAL		59

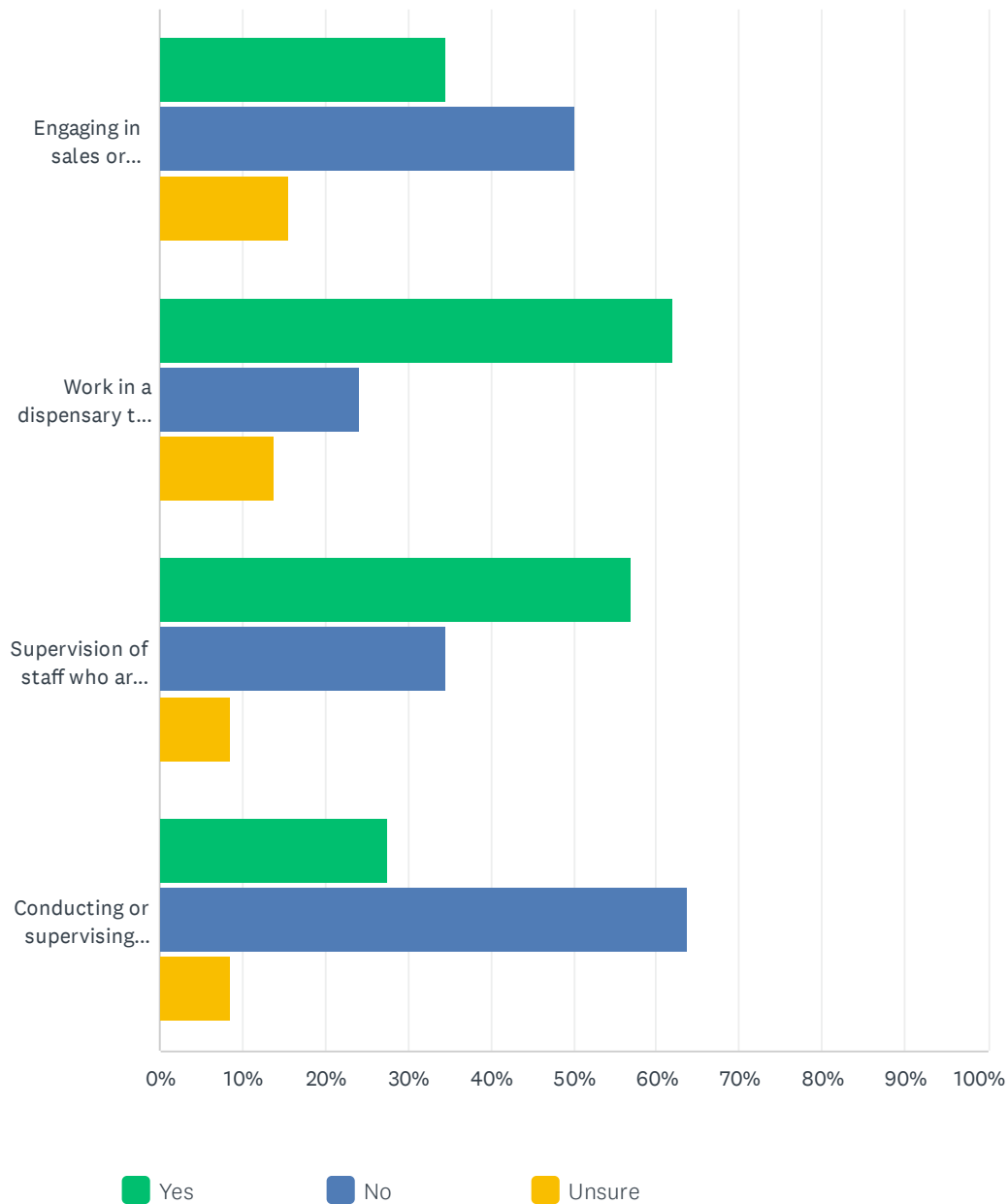
Q8 Please specify what other activities should be included on the list:

Answered: 8 Skipped: 51

#	RESPONSES	DATE
1	Volunteer work e.g. medical mission	5/11/2023 8:56 AM
2	Working on the side of the industry that produces and manufactures the products and customer service relations that pertain to upholding the best product for the visual needs of the general public	5/10/2023 6:22 PM
3	Professional activities such as peer assessing, examining	5/8/2023 9:56 PM
4	Taking advanced courses in other jurisdictions than Ontario. working in other jurisdictions to advance knowledge in the optical field. lecturing and setting up lectures or any other work which will benefit the optical community in advancing their knowledge.	5/4/2023 3:40 PM
5	Mobile, online, on call, and home visits.	5/4/2023 2:31 PM
6	Concerned about Opticians that are in roles where they train opticians work for the associations, these skills are still using their opticianry skills even though their hands on dispensing is less they still need to be even more trained to bring the new concepts to the rest of us	4/19/2023 11:33 AM
7	Teaching or research in opticianry	4/14/2023 9:55 PM
8	Creating and/or continuing education content	4/14/2023 1:52 PM

Q9 The proposed policy lists certain activities that will NOT count as “practice hours”. Do you agree that the following activities should not count as practice hours?

Answered: 58 Skipped: 1



Registrant and Stakeholder Consultation: Currency of Practice Policy

	YES	NO	UNSURE	TOTAL
Engaging in sales or marketing of eyewear or optical appliances	34.48% 20	50.00% 29	15.52% 9	58
Work in a dispensary that is not related to opticianry services (e.g. human resources, information technology, risk management, business administration)	62.07% 36	24.14% 14	13.79% 8	58
Supervision of staff who are not providing opticianry services or engaging in dispensing (e.g. supervision of IT staff or reception staff)	56.90% 33	34.48% 20	8.62% 5	58
Conducting or supervising research in opticianry	27.59% 16	63.79% 37	8.62% 5	58

Q10 Please provide any additional comments about the proposed policy:

Answered: 21 Skipped: 38

#	RESPONSES	DATE
1	I disagree with the assumption that people engaging in sales or marketing of eyewear or optical appliances or conducting or supervising research in opticianry do not have the knowledge, skills and abilities that are vital for providing quality eye care services to the public. Are we suggesting that all opticians who work for Essilor, Hoya, Zeiss, etc. do not possess the knowledge or skills vital for providing quality eye care services to the public? If the College truly cares about improving the quality of eye care services to the public, it must focus on improving the quality of the annual continuing education activities since most of them, in the current format, are useless and costly while providing little or no educational value.	5/14/2023 1:39 PM
2	looks good.	5/12/2023 5:53 PM
3	I see you are doing great job making more policies and rules that apply to registered licensed optician while the number of non licensed optician are growing everyday, in fact, the number of non licensed optician are more than licensed optician. The optometrists are welcome non licensed optician to work with, as they are cheaper and have no boundary to the collage of optician. In addition, there are many optical shops running optician services for over decade in Ontario, in the same province that you are making new policies to assure the public safety and knowledge of the opticians! Why dont you move out of your office and make sure you force the law to many optic shops that never had an licensed optician, where the prescription glassed dispensed with non-licensed optician across the province. It is a shame that many optic shops have no single licensed optician. This is the most important task you should take care of first rather than wasting every one time just for showing off that you are working in office. Maybe license opticians should run a campaign against the college members, who are not able to force the law and stop non-licensed optician services across the providence.	5/7/2023 3:37 PM
4	The optician should be actively involved in the field	5/7/2023 7:22 AM
5	The requirement for new practicum of having 5 RGP fits is unreasonable in today's environment because it is almost impossible to find dispensaries that still sell these lenses. Even if one does get 5 fits, that is not nearly enough to make one competent to be certified as an RGP fitter.	5/5/2023 8:53 PM
6	I think the slate should be wiped clean for this upcoming 3 year/ 500 hours requirement starting with the implementation of the new currency of practise policy that will be put in place June 2023. The concerns of covid over the last 3 years have seen opticians not wanting to expose themselves to Covid and have not been working but have been maintaining/ paying their license fees. I don't think they should be penalized for being inactive. Start the 3 year 500 hour requirement anew starting with the new currency of practice policy.	5/5/2023 9:27 AM
7	Not sure why we would need 5 RGP's of 20 c/l fits when they are becoming vertically obsolete	5/4/2023 4:20 PM
8	your in bracket comments are out of order, they make people think in a restricted way.	5/4/2023 3:40 PM
9	The question is deceiving. The answers require further discussions.	5/4/2023 2:31 PM
10	Adding a log book component of detailing your fitting is unprofessional and a waste of professional time. Employers are not going to allow time to sit and add fittings. The log book compnent makes sense for Student opticians.....Not for Licensed Opticians.... We have Quality assurance to provide continuing education and adding a component of logging your fittings is not practical.... I wish that the college would take initiative in banning on-line sales. They dont have to provide any protection to the consumer and it makes a case to leave the profession all together and start an online service....Public protection is not happening in on line sales...The inititative has always been to protect the public, it seems like the College is taking aim at Opticianary and trying to help large companies deregulate and create an open market..... No one will benefit except large corps. cheers Concerned Optician	4/29/2023 3:19 PM
11	Question 7 was vague, I selected yes that I agreed they should not count. Just in case I was suppose to say no for "no they should not count" ;p	4/28/2023 3:16 PM

Registrant and Stakeholder Consultation: Currency of Practice Policy

12	We are losing so many Licensed Opticians because of retirement and the obscene renewal charges that it makes no sense to force experienced people to do refresher courses just because they wish to work parttime in their retirement. The 'refresher' course seems to be yet another CASH GRAB by this college. providing an up to date portfolio should be enough. There are few new opticians coming up to fill the void because of the ridiculously high license fees and program costs. I still have no explanation why the office is situated in downtown TO , a place with some of the highest rents in North America, when everything is done online. Perhaps if the office was out of the core our license fees would be less.	4/25/2023 9:05 AM
13	please consider some credits for opticians who have full time job	4/23/2023 7:27 PM
14	I think there needs to be a half way consideration for the variety of jobs opticians hold it should not be all or nothing	4/19/2023 11:33 AM
15	This is ridiculous. People don't have time to spend on proving to the college that they are capable when the college is not doing anything to stop unlicensed individuals in the marketplace. Stop making work for people already registered and practicing who don't have time for more crap from the college	4/17/2023 6:53 PM
16	Don't need to change, why embarrass yourself	4/17/2023 10:51 AM
17	Conducting or supervising research in opticianry - could be considered as Professional Growth and/or self-directed CE hours as you are engaging in studies and research in relation to opticianry. It allows for continual growth in researching or discovering new technologies related to eyeglasses and contact lenses which an optician may use to advance their skills and knowledge to assist in the dispensary.	4/16/2023 8:50 AM
18	When a non practicing Optician is paying an expensive fee per year there should be many options available especially that these Opticians in the event of an emergency will be called upon to assist practicing Opticians. The idea pf the policy is good however, in my situation I had to leave for health reasons and am currently working elsewhere that is not a dispensary when you set new guidelines as such it makes it quite challenging. Along with paying tuition, license fees and renewals I believe it would be beneficial for the Association to consider other factors before implementing policy changes as not everyone fits in the same bucket.	4/14/2023 5:22 PM
19	If I understood correctly the need for 250 hours supervised by peers, that would mean that 2 opticians have to be present at any given moment. While most Optical stores have overlapping hours, it would be economically impossible to have so many employees, especially for stores open long hours and weekends. It would require 4 full time and 4 part time opticians per week to legally dispense a pair of glasses at any given business hour.	4/14/2023 4:44 PM
20	Sales representatives who work for contact lenses, optical equipment manufacturers and optical pharmaceuticals are in a way teaching. So I think this should be considered as actively working in the field.	4/14/2023 4:30 PM
21	Any and all work related to a dispensary should count	4/14/2023 2:04 PM