

BRIEFING NOTE

TO: Board of Directors

FROM: Clinical Practice Committee

DATE: September 28, 2026

SUBJECT: Patient Record Keeping Obligations

☒ For Decision

☐ For Information

☐ Monitoring Report

Purpose:

To seek approval to rescind the existing 'Joint Record Keeping Obligations' policy and replace it with a new practice guideline that would be incorporated into the Standards of Practice related to patient record keeping obligations in collaborative practice environments.

Background:

Joint Record Keeping Obligations

The College of Optometrists Professional Misconduct Regulation was updated in 2016, resulting in optometrists and opticians entering collaborative work models. To address record keeping issues that arose for both professions, a stand-alone document was drafted in collaboration with the College of Optometrists in 2017 titled '[Joint Record Keeping Obligations](#)'.

While the document helps to identify the need for a shared understanding between professionals and responsibilities when leaving practice, it does not clearly explain the record keeping obligations for opticians working in collaborative practice environments. The title also caused confusion as it was taken by some to mean that there was no need for the optician to keep their own separate records.

This has led to questions that continue to persist from our registrants including:

- i) What information should be included in an opticianry record?
- ii) Must the opticianry records be separate from optometry records?
- iii) What information can be shared between the optometrist and optician?
- iv) Can the information in optometry records be accessed when providing opticianry services to a patient?

Standards of Practice

The Professional Standards of Practice set out the College's expectations for how opticians will conduct themselves in their practice. A core expectation is that opticians use their professional judgement to make appropriate decisions in providing care to patients.

Guidelines describe best practices for opticians and explain and interpret the standards of practice and other responsibilities of an optician. Guidelines are a resource to help opticians understand how to make safe and ethical practice decisions.

Standard 5: Record Keeping establishes the College's expectations for the content, retention, privacy, and accessibility of patient records. Supporting guidelines provide additional direction by interpreting specific aspects of the standard, such as documentation requirements, patient access to personal health information, privacy, record storage, and responsibilities when selling a practice or retiring .

For Consideration:

Attached is a draft practice guideline (Appendix A) intended to set out and clarify the College's expectations for opticians around record-keeping in collaborative practice environments. This high-level guidance is applicable to a broader range of practice scenarios and is meant to be broad enough to account for other health professionals that the optician might be working with.

Much of the guidance referencing optometry has been removed as it was not pertinent to our registrants.

The guideline is intended to reduce uncertainty for registrants and provide clearer expectations, aiming to clarify:

- the custodian of the records must be identified
- the purpose of the records must be identified
- the health care professional providing the service must be identified
- proper opticianry records must be kept for services provided
- ensuring patient understanding and consent
- access to records

The Committee is recommending this guideline be integrated into the existing Standards of Practice under Standard 5: Record Keeping.

Public Interest Considerations:

Clear record-keeping expectations support the public interest by promoting transparency and accountability in opticianry practice. Clarity with regards to maintenance and access to complete health records will ensure patient confidentiality and access to their health records.

Diversity, Equity, and Inclusion Considerations:

The new guideline supports equitable access to care by promoting consistent expectations for patient records across different practice models and settings.

Risk Management Considerations:

The new guideline supports risk management by clarifying registrant obligations and reducing the likelihood of inconsistent record-keeping practices. From a reputational perspective, the guideline reinforces the College's role in promoting transparent, accountable practice standards, while helping registrants understand how to meet their professional obligations.

Recommendations/Action Required:

The Committee recommends that the Board rescind the existing Joint Record Keeping Obligations policy and replace it with a new practice guideline on patient record keeping obligations to be incorporated into the Standards of Practice under Standard 5: Record Keeping.

Practice Guideline: Record Keeping Obligations in Collaborative Practice Environments

The following record-keeping guidelines apply to opticians who practise in collaborative practice environments where patient records may be created, accessed or maintained by multiple health care professionals, including both opticians and non-opticians (e.g. optometrist, physician, etc.).

As a reminder, opticians remain responsible for any opticianry services they provide, even if those services are provided under the direction of another health professional.

In addition, as noted elsewhere in these Standards, opticians who take over dispensing services from another authorized dispenser are considered to become the **most responsible dispenser**. This means that they become responsible for ensuring the patient record with respect to dispensing services is complete and accurate.

Record-keeping expectations for opticians in shared/collaborative practice environments:

- **Who is the custodian:** Opticians should ensure they understand who the Health Information Custodian (HIC) is in the practice environments and what their legal obligations are as (HIC) or agent with respect to patients' personal health information (PHI) (see Practice Guideline: Health Information Custodian versus Agent).
- **Identify the purpose of the records:** Opticians should distinguish between when they are keeping records for *opticianry services*, versus when they are contributing to the record for a non-opticianry service (e.g. eye exam or surgical procedure).
 - A record collected by an optician for an opticianry service is considered an opticianry record.
 - A record collected by an optician for a non-opticianry service (e.g. pre-testing or other records relating to an eye exam or surgical procedure) are not considered opticianry records.
- **Identify who provided the service:** Patient records should clearly identify which health professional provided each service.
- **Keep proper opticianry records:** When providing an opticianry service, opticians should ensure they collect all the information required by these Standards for the purposes of the opticianry service provided, regardless of whether the service is being provided under the direction of another health professional (such as an authorized prescriber).
- **Ensure patient understanding and consent:** Opticians should satisfy themselves that patients understand who will have access to their records and how those records will be shared between the different health professionals in the practice environment.
- **Provide access to records where required:** Where required by the College, or on request by the patient, the optician must be able to produce copies of records relating to any opticianry services provided.