

## Briefing Note

**TO:** Board of Director

**FROM:** Registration Committee

**DATE:** October 3, 2022

**SUBJECT:** 10.0 Experience Consideration for Contact Lens Mentor Eligibility  
Appendix A: Contact Lens Mentor Policy

☒ For Decision

☐ For Discussion

☐ Monitoring Report

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**Purpose:**

To consider a proposed amendment to the experience requirements in the Contact Lens Mentor Policy.

**Background:**

The Contact Lens Mentor Policy sets out the guiding principles by which the College of Opticians of Ontario (the “College”) carries out its mandate on setting the minimum professional standards that an optician must meet in order to be eligible to act as a contact lens mentor.

The current Contact Lens Mentor Policy requires that opticians who act as supervisors be registered with the College, in good standing, without terms, conditions or limitations on their certificate of registration and be actively and currently practising for a minimum of three (3) years, **or** have fitted the minimum number of contact lenses in the previous three years as follows:

- a) In order to supervise soft contact lens fits: has fitted a minimum of 50 soft contact lenses (including 40 spherical and 10 non-spherical [toric or multifocal]), **OR**
- b) In order to supervise soft and rigid contact lens fits: has fitted a minimum of 50 soft contact lenses as described above and a minimum of 15 rigid contact lenses (including spherical and complex designs).

The policy was amended in July 2020 to allow registered opticians who acquired the necessary knowledge, skill and judgment in a period less than three years to be eligible for supervision of students and interns. When considering these changes to the Contact Lens Mentor policy, the Registration Committee recognized that the requirement of practising for a minimum of three years in order to qualify as a contact lens mentor constitutes a barrier to individuals who acquired the necessary knowledge, skill and judgment in a shorter period.

**For Consideration:**

In 2022, the Contact Lens Mentor policy underwent another review by the Registration Committee. On review, the Committee determined to recommend that the Board amend the experience requirements in the Contact Lens Mentor Policy to require that opticians:

- Be registered with the COO or another Canadian opticianry college for at least 1 year; AND
- Have fitted the minimum number of contact lenses in the previous three years, as set out above.

The Committee expressed a concern that removing the minimum time requirement from the contact lens mentor eligibility criteria altogether will not allow the opticians to acquire a skill set critical for a good mentor. The Committee agreed that building both soft and technical skills takes time; therefore, setting the minimum time period for a practice requirement will ensure that the optician brought their skills to an adequate quality level, which, in turn, will lead to a more effective mentoring relationship with their mentee. The Committee felt, however, that it would be appropriate to shorten the qualifying period from three years to one. This would reduce the chance that qualified opticians would be excluded from eligibility and help to reduce the risk of a shortage of contact lens mentors to meet the needs of opticianry students.

The Board is asked to consider the environmental scan of other regulatory colleges, the empirical evidence, and the concerns brought forward by the Registration Committee to determine whether the minimum time period for a practice requirement must be added to the contact lens mentor eligibility criteria.

To inform the decision-making process, the Committee reviewed practices of other Ontario health regulators as well as empirical evidence gathered by the College staff.

#### *Environmental Scan Results*

The environmental scan identified that while there was a consensus among regulators as to having a comprehensive knowledge base and experience in clinical practice, the majority of regulators did not have a specific requirement for a minimum professional practice experience.

#### *Literature Review*

There is limited evidence suggesting that possessing a certain number of years of experience makes a good mentor or supervisor. Individual competency is rather described by a cluster of knowledge, skills, abilities, and personal characteristics that are required for effective performance as a clinical supervisor.

#### *Reasonable Bona Fide Requirement Considerations*

In review and consideration of the information above, the Committee noted that opticians are in a unique position as they work with medical devices, which allows quantifying their competence by the number of fits performed on a patient rather than a time frame. At the same time, the Committee acknowledged the importance of confidence in delivering the services and interacting with patients closely which comes with experience. Therefore, the Committee determined that setting the minimum experience requirement at one year along with completion of fits to be eligible to act as a contact lens mentor allows enough flexibility to account for individual life circumstances while still maintaining appropriate professional standards.

### **Public Interest Considerations**

The College is tasked with ensuring that registrants meet the required professional standards to practise opticianry in Ontario. The Contact Lens Mentor Policy serves this purpose by setting out the minimum professional standards that an optician must meet to be eligible to supervise contact lens fittings performed by student and intern opticians.

In considering changes to the policy, the Committee recognized the importance of having a sufficient number of contact lens mentors to ensure that students are able to acquire the required fits in a timely manner and meet their entry-to-practice requirements. The intent of the proposed changes was also to ensure that the eligibility parameters are straightforward and set out clearly in the policy.

### **Diversity, Equity, and Inclusion Considerations**

The College's obligation to uphold professional standards must be balanced against its obligations under the *Ontario Human Rights Code* to avoid practices and policies that directly or indirectly discriminate against registrants on the basis of the protected grounds.

The Committee recognized that a requirement to be registered for a certain period of time may create unnecessary barriers for both opticians and students and opted for a shorter time-period requirement than the one that had previously been in place.

### **Recommendations/Action Required:**

The Registration Committee makes the following recommendation(s):

1. That the Board approve the proposed amendments to the Contact Lens Mentor Policy

## REGISTRATION POLICY

### Contact Lens Mentor

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#### Contact Lens Fittings Requirements

It is a requirement under Section 5 (2) 3. of Ontario Regulation 869/93, that an applicant for a certificate of registration as a Registered Optician must have,

“... completed, and must present evidence of, at least twenty contact lens fittings, including at least five rigid gas permeable (RGP) contact lens fittings, under the supervision or direction of an optician who is certified in the fitting of contact lenses or an optometrist or an ophthalmologist.”

#### Supervision of Contact Lens Fittings and Signing of Logbooks

All registered opticians, who wish to supervise the contact lens fittings of student or intern opticians and sign the student or intern logbook, must be recognized by the College as a Contact Lens Mentor for either “soft” or “soft and rigid” fits.

#### Eligibility Criteria for Contact Lens Mentor Status

A Registered Optician who wishes to be recognized as a Contact Lens Mentor by the College must submit the appropriate application to the College, which confirms that they meet the following criteria, as set out by the Registration Committee:

1. Is a registrant in good standing with the College;
2. Currently works in a practice which includes the dispensing of contact lenses as part of the services offered to the public; ~~and~~
- ~~3.—Demonstrates experience as a Registered Optician, as follows:~~
  - ~~a-3.~~ Has been registered as a Registered Optician for a minimum of ~~three-one~~ years with the authority to dispense contact lenses in Ontario and/or in another Canadian jurisdiction where opticianry is a regulated profession; ~~OR and~~
4. Has fitted the minimum number of contact lenses in the previous three years, as follows:
  - ~~(a)~~ —In order to supervise soft contact lens fits: has fitted a minimum of 50 soft contact lenses (including 40 spherical and 10 non-spherical [toric or multifocal])
  - ~~a.~~ \_\_\_\_\_
  - ~~i-b.~~ —In order to supervise soft and rigid contact lens fits: has fitted a minimum of 50 soft contact lenses as described above and a minimum of 15 rigid contact lenses (including spherical and complex designs).

A registrant who is approved by the College as a Contact Lens Mentor must agree to the following:

1. That their name be added to an official registry of Contact Lens Mentors for the purpose of supervising student or intern opticians who wish to obtain contact lens fittings;
2. Permit the College to inspect contact lens files for verification of required fittings; and
3. Not charge a fee to sign logbooks or supervise student or intern opticians.

Registered Opticians may only begin supervising contact lens fits and signing student or intern logbooks after receiving confirmation from the College that their Contact Lens Mentor status has been approved. A letter will be provided by the College certifying the Contact Lens Mentor status.

Registered Opticians who are considered “soft Contact Lens Mentors” may only supervise and verify soft contact lens fits. Registered Opticians who are considered “soft and rigid Contact Lens Mentors” may supervise and verify both soft and rigid fits.

The Contact Lens Mentor status is valid for a period of three years from the date of approval. Registered Opticians are required to re-apply after three years in order to continue signing student logbooks.

The College is committed to adhering to the principles set out in the Ontario Human Rights Code. Registered Opticians who wish to be recognized as a Contact Lens Mentor may contact the College directly to request accommodation with respect to the criteria set out in this Policy.

### **Temporary Addendum to the Contact Lens Mentor Policy**

From July 27, 2020 to December 31, 2022, the Registration Committee waives criterion #2 for eligibility to act as a Contact Lens Mentor (that the Registered Optician currently work in a practice which includes the dispensing of contact lenses as part of the services offered to the public) where the Registered Optician:

1. Is currently employed as an instructor in an opticianry program at an educational institute that has been accredited by the College.
2. Teaches one or more courses relating to contact lenses.
3. Meets all other requirements set out in the Contact Lens Mentor Policy.

Any Registered Optician who is approved as a Contact Lens Mentor in accordance with this addendum will be granted Contact Lens Mentor status until no later than December 31, 2022. Registered Opticians wishing to continue as a Contact Lens Mentor beyond December 31, 2022 must re-apply at that time and their application will be considered in accordance with the eligibility criteria that are in place at that time.