

Briefing Note

TO: Board of Directors
FROM: Registration Committee
DATE: June 5, 2023
SUBJECT: 8.2 Practicum Policy

For Decision For Discussion Monitoring Report

Purpose:

To review and approve the proposed new Practicum Policy.

Background:

The College of Opticians of Ontario (the College) is currently seeking [amendments](#) to its Registration Regulation. One of the proposed changes includes moving the details of the practical experience requirement for registration into a practicum policy.

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.

At this time, the Registration Committee is proposing a policy that mirrors current registration requirements to ensure that a policy is in place by August 31, 2023. The College plans to engage in further consultations with educational institutions, industry members, and other stakeholders at a later date to review and update the practicum.

For Consideration:

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

1. A draft of the proposed Practicum Policy – **Appendix A**
2. An environmental scan of practices of Ontario health regulatory bodies – **Appendix B**
3. Stakeholder feedback received by the College – **Appendix C**

Key features of the proposed policy

The proposed policy mirrors current entry-to-practice requirements set out in the [Registration Regulation](#) with respect to minimum dispensing hours, eyeglass and contact lens fittings as follows:

- 1000 verified dispensing hours
- 250 eyeglass fittings (100 multifocal and 25 myopic or hyperopic)

- 20 contact lens fittings (including at least 5 rigid gas permeable)

Environmental Scan Results

At the request of the Registration Committee, staff conducted an environmental scan of Ontario health profession regulators concerning entry-to-practice practicum.

The information gathered demonstrated that many health regulatory Colleges require that applicants have gained practical experience before they can become registered to practise the profession in Ontario. Threshold competency is assessed by the regulators in a quantitative manner, such as providing evidence of completion of a specified number of supervised experiential hours.

A full breakdown of the findings is attached as Appendix B.

Stakeholder Feedback

The draft Practicum Policy was initially circulated via 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 coordinators of accredited opticianry programs in Canada, the Ontario Opticians Association, and the office of the Ontario Fairness Commissioner.

The survey closed on May 14, 2023, and received 100 responses. Survey respondents included registered student and intern opticians, registered opticians, a member of the public, and a representative of another regulatory body.

Of those responses:

- 85 (85%) indicated that the practicum requirements set out in the proposed policy were clear.
- 12 (12%) indicated that the practicum requirements set out in the proposed policy were unclear.
- 3 (3%) were neutral, undecided, or their position was not clear

The survey results demonstrated that the majority of survey respondents were in support of the proposed policy. A number of stakeholders raised a concern regarding the requirement to complete the rigid gas permeable (RGP) fits as part of the practicum due to the challenge of finding an RGP mentor and lack of patient cases.

Committee Consideration

On review, the Registration Committee did not recommend any changes to the proposed policy. The Committee acknowledged the concern raised by stakeholders regarding the difficulty to complete the required RGP fits; however, the Committee determined that in order to meet the Aug 31st deadline it was appropriate to move forward with the proposed policy and revisit this requirement at a later date once there has been an opportunity for consultation.

Public Interest Considerations

The proposed policy mirrors entry-to-practice requirements that are set out in the current regulation. These requirements were initially established following a thorough review process, and are consistent with what all accredited education programs are teaching toward. Any changes to the practical component of the entry-to-practice requirements should only be made after a thorough review and consultation to ensure the requirements continue to align with national competencies and will be consistent with accredited education programs.

Diversity, Equity and Inclusion Considerations

The Registration Committee considered that moving the practical experience requirements to the policy will allow the College for a flexible approach should changes to the practical experience requirements are needed.

The Committee further recognized a concern raised by stakeholders regarding significant challenges faced by students in acquiring the required RGP fittings due to the shortage of RGP mentors and scarcity of RGP lens wearers. This was identified as a potential barrier as the students' inability to complete the required fittings in a timely manner may impede their graduation from the program and subsequent registration as an optician. However, the Committee was of the view that there is a need to engage in a proper review and consultation process before making any substantive changes to the entry-to-practice requirements.

Recommendation/Action Required:

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

REGISTRATION POLICY

Practicum Policy

Introduction

To qualify as a Registered Optician, applicants must demonstrate to the Registration Committee that they have acquired practical fitting and dispensing experience.¹

The following policy outlines the College's **Practicum** for applicants seeking registration as a Registered Optician. This Practicum may be completed as part of the applicant's educational program, or separately if the educational program does not include co-op placements or other practical experience components.

Applicants who are unable to complete the Practicum will be asked to demonstrate to the Registration Committee that they have gained the equivalent practical experience in another way.

Practicum

The Practicum consists of the following elements:

Activity	Minimum Requirement	Supervision Requirement
Verified dispensing experience	1000 hours	All dispensing must be supervised by a person authorized to dispense prescription eyeglasses, contact lenses and/or subnormal vision devices in the jurisdiction where the dispensing takes place (e.g. optician, optometrist, ophthalmologist).
Eyeglass fittings	250 fittings, including at least: <ul style="list-style-type: none"> • 100 multifocal; and • 25 myopic or hyperopic 	All eyeglass fittings must be supervised by a person authorized to dispense prescription eyeglasses in the jurisdiction where the dispensing takes place (e.g. optician, optometrist, ophthalmologist).
Contact lens fittings	20 fittings, including at least: <ul style="list-style-type: none"> • 5 rigid gas permeable (RGP) 	All contact lens fittings must be supervised by a person authorized to dispense contact lenses in the jurisdiction where the dispensing takes place (e.g. optician, optometrist, ophthalmologist). Contact lens fittings that take place in Ontario must be supervised by an individual who has been approved as a Contact Lens Mentor under the College's Contact Lens Mentor Policy .

¹ See section 5(1)2 of the Registration Regulation

Evidence

Applicants must provide evidence that they completed the Practicum. The following documents will be accepted as evidence of completion:

- Certain accredited education programs include all of the elements of the Practicum as part of their curriculum. Graduates of these programs may submit a letter from their education program verifying completion of the Practicum.
- Graduates from:
 - Accredited education programs that do not include the Practicum in their curriculum;
 - Non-accredited education programs; or
 - Internationally trained applicants

must submit [Form A – Dispensing Experience Verification](#) signed by themselves and by the person(s) who supervised their Practicum.

Governing Body	Entry to Practice Practicum Requirements	Notes
College of Audiologists and Speech-Language Pathologists of Ontario	Yes. 750 hours of patient care or related work, or a combination. (Annex 1)	Set out in Section 5(2)(b) of the Registration Regulation under the <i>Audiology and Speech-Language Pathology Act</i> . A breakdown on the practicum and coursework requirements are listed on documents here (for audiology) and here (for speech-language pathology).
College of Chiropractors of Ontario	None.	
College of Chiropractors of Ontario	None.	
College of Dental Hygienists of Ontario	None.	
College of Dental Technologists of Ontario	Only if applicants have graduated more than 24 months prior to the date of application – must provide evidence of 1300 experiential hours of dental technology practice gained three years before the date of application.	CDTO Registration Requirements
College of Denturists of Ontario	None.	
College of Dietitians of Ontario	Yes. Minimum of 1250 hours of practical training in an accredited practical program in Canada, or equivalent.	Set out in Section 6(1)1.ii of the Registration Regulation under the <i>Dietetics Act</i> . Training is completed as part of an accredited program, or applicant may complete a non-accredited practicum. The specific practical training hours are set out in the 2-10 Assessing Academic & Practical Training Requirements Policy .
College of Kinesiologists of Ontario	None.	
College of Massage Therapists of Ontario	None.	Practical exam (OCSE) required for registration.
College of Midwives of Ontario	Yes. Attend a minimum of 60 births.	Set out in Section 8(2)ii of the Registration Regulation under the <i>Midwives Act</i> . The Regulation also stipulates that applicants must have current clinical experience consisting of active practice for at least two out of the four years immediately before the date of application (section 8(2)i).
College of Nurses of Ontario	Yes, requirements vary depending on classification.	Evidence of practice can be both clinical and non-clinical and is usually completed when receiving nursing education.
College of Occupational Therapists of Ontario	Yes. 1000 hours of fieldwork or clinical practicum as part of an educational program.	Section 36(1)2 of the General Regulation under the <i>Occupational Therapy Act</i> .
College of Optometrists of Ontario	None.	
College of Physicians and Surgeons of Ontario	No specific number; requirements vary depending on type of license.	Set out in the Registration Regulation under the <i>Medicine Act</i> .
College of Physiotherapists of Ontario	None.	Ontario Clinical Exam launched in 2022 and does not include a practical component. Practical experience of 1200 hours over a five-year period is required for currency.
College of Respiratory Therapists of Ontario	Only if applicants have graduated more than 2 years prior to the date of application – must provide evidence of respiratory therapy practice in the past two years.	CRTO Registration Requirements
College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario	Yes. Minimum of 45 weeks of clinical experience involving at least 500 hours of direct patient contact.	Set out in Section 9(1)2 of the Registration Regulation under the <i>Traditional Chinese Medicine Act</i> .
Ontario College of Pharmacists	None.	

Note: Royal College of Dental Surgeons of Ontario, College of Medical Laboratory Technologists of Ontario, College of Medical Radiation and Imaging Technologists of Ontario, College of Naturopaths, Ontario College of Pharmacists, and College of Registered Psychotherapists of Ontario do not have practicum requirements for initial registration.

Annex 1 – CASLPO Policy on Patient Care and Related Work

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:

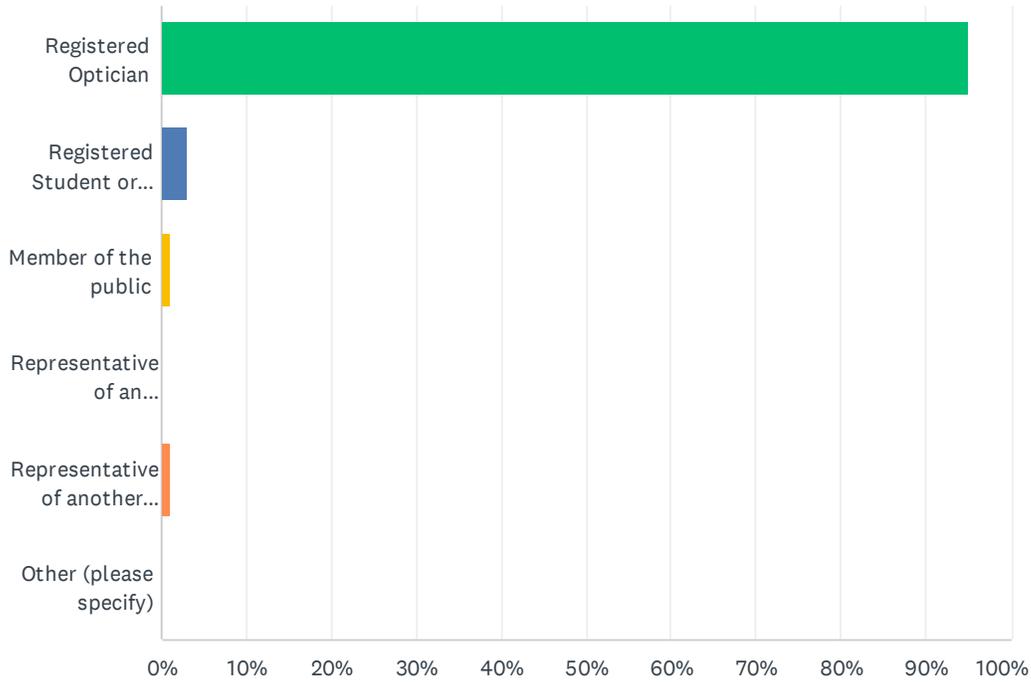
- Making decisions on the organization and delivery of clinical services in audiology or speech-language pathology.
- Educating audiologists or speech-language pathologists concerning approaches, services, technologies, or products that may be employed in the intervention of patients with communication 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.

Q1 Please indicate if you are a :

Answered: 100 Skipped: 0

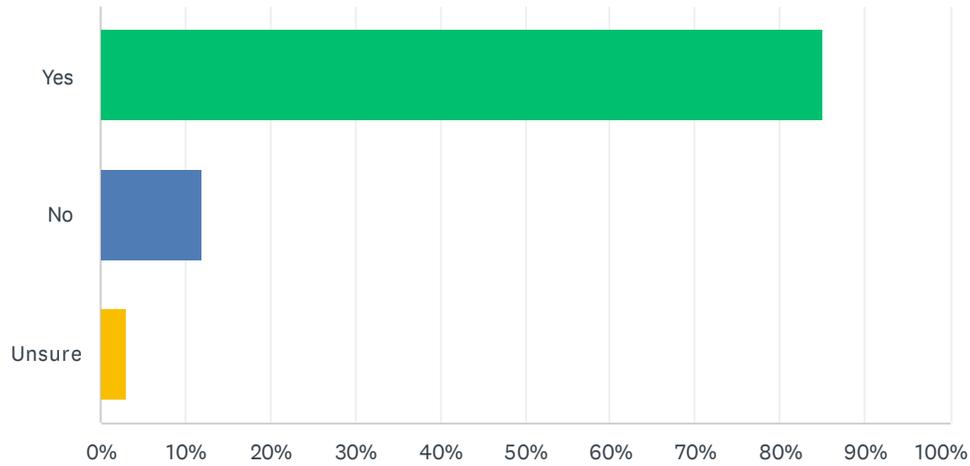


ANSWER CHOICES	RESPONSES	
Registered Optician	95.00%	95
Registered Student or Intern Optician	3.00%	3
Member of the public	1.00%	1
Representative of an opticianry association	0.00%	0
Representative of another regulatory body	1.00%	1
Other (please specify)	0.00%	0
TOTAL		100

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

Q2 On review of the proposed policy, do you think the practicum requirements are clear?

Answered: 100 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	85.00%	85
No	12.00%	12
Unsure	3.00%	3
TOTAL		100

Q3 What did you find unclear about the practicum requirements?

Answered: 10 Skipped: 90

#	RESPONSES	DATE
1	This is to apply the new rule to the registered licensed opticians who are already inline with law and policies, while the number of non licensed optician are getting more than us without any forcing policy, they do dispensing as non licensed optician and no rule, regulation and policies apply on them. That is unclear and unfair to many registered licensed optician who have Canadian college degree, passed successfully National Exams and pay for their license annually.	5/7/2023 4:56 PM
2	What exactly are the requirements? Did I miss something?	5/5/2023 10:15 PM
3	The requirement of 25 myopic or hyperopic fits doesn't make sense because what else can they be (if not myopic or hyperopic)??	5/5/2023 9:05 PM
4	?	5/4/2023 4:30 PM
5	Why are rigid lenses still considered a requirement? If we are updating policies, we should be updating components are included in a practicum	5/4/2023 3:23 PM
6	Why did we need this if we already state how many hours a week we work on our renewal and do our yearly credits.	5/4/2023 2:40 PM
7	Practicum requirements should be included as part of the program for students	4/25/2023 8:56 AM
8	1. The registration regulation was replaced by practicum policy , is it only for new graduated student optician or intern optician? 2.1000 dispensing hours & 250 eyeglass fitting within how many years for the intern optician to reach the entry to practice requirement ? 3. How many percentage of patient for HCL here. All patients tend to have daily disposable SCL right now for their health, either they have high astigmatism correction. The trend should be updated for the entry to practice requirement.	4/16/2023 3:26 PM
9	I do not see how this is useful	4/14/2023 5:12 PM
10	Contact fitting	4/14/2023 4:35 PM

Q4 Please provide any additional comments on the proposed policy.

Answered: 48 Skipped: 52

#	RESPONSES	DATE
1	It is difficult to get 5 rigid lens for many registrants.	5/12/2023 5:46 PM
2	I think the practicum is good enough for both the safety on public and the R.O. improved professional improvement.	5/11/2023 3:27 PM
3	No comments at this time	5/11/2023 8:42 AM
4	Personally, I think it's ridiculous. An optician should not have to track their fits etc. the RGP requirement is a joke. The demand is different depending on where you practice. Also, some companies don't have access to RGP's. Also, we, as Opticians had the choice to be certified in soft/rigid or both. If this proposed amendment is approved, I strongly feel their should be a grandfather clause for opticians who have been practicing for several years. Dispensing regularly and having to complete the portfolio (which I also feel is ridiculous) should be enough!	5/8/2023 10:02 PM
5	The requirements for RGP fits is too high. RGPs is basically obsolete and even finding one patient is hard enough. You have at least 100 students every year and having 5 fits each means 500 RGP fits. Impossible.	5/8/2023 2:16 PM
6	I think it is very clearly explained the requirement for the candidate who want to register Ontario Licence Optician.	5/7/2023 10:59 PM
7	Form a inspection team that you never had and make sure there is an inspection process and procedure in place. The non optician who are working over decade in this providence are not afraid of not being inline with law as there is no one in this providence and most probably in whole country to check any of them, while you are making new amendment to the existing law to put more pressure and cost to the group of opticians who are already inline with law and the optician college rules and policies.	5/7/2023 4:56 PM
8	Practical aspect is must	5/7/2023 7:17 AM
9	I agree that practicum policy is a good idea & can better insure that the new optician has good experience behind them before they are licensed & let loose on the public	5/7/2023 12:14 AM
10	??	5/5/2023 10:15 PM
11	The requirement of having 5 RGP fits is very 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 touch RGP much less being certified as an RGP fitter.	5/5/2023 9:05 PM
12	I totally agree with having practicum before starting work as an registered optician	5/4/2023 10:19 PM
13	i approve	5/4/2023 9:11 PM
14	The practicum policy should aim for an efficient and knowledgeable registered optician that is good with people.	5/4/2023 8:41 PM
15	The policy regarding rigid gas permeable lens fittings is totally nonsensical. The amount of people who wear RGP lenses is dwindling and it is difficult to find anyone who is willing to undertake the time to shadow students and fulfill the requirements. The fact that only 20 contact lens fittings are required and of that 20, there has to be at least 5 rgp fittings is a strong indication that we as a professional entity are heading down an extremely slippery slope which borders on the ridiculous. There needs to be an expedited revision of this archaic policy. Should an optician know how to fit an RGP lens? Absolutely. Fitting 5? Absolutely NOT!	5/4/2023 8:33 PM
16	Practicum requirement is good. Al though in my opinion over the years I have practiced in Canada, I noticed that most of the opticians are lacking on skills when it comes to dispensing. Most of the opticians I met have very little experience on fitting glasses. There is definitely a huge learning deficit. We are laking very much on proper crafting of a frame. I'm not saying we	5/4/2023 8:10 PM

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need to know how to make a frame. But there should basic knowledge and hands on curses for every student. This should be a big part in the term test as well. I could make a huge list of things opticians should learn or acquire for dispensary. At the end the end product should be useful for the patient. They should see well and feel good. If we had licensed opticians who has greater skills, this will be one way we can out grow the online market.

17	None	5/4/2023 7:51 PM
18	I'm not understanding why we would need to experience 5 of 20 c/l fittings would have to be RGP's when these fittings are becoming almost obsolete	5/4/2023 4:08 PM
19	Rigid lenses should be removed and replaced with specialty fits (or: myopia control, Pediatric fits, lenses for dry eyes, etc).	5/4/2023 3:23 PM
20	I wish College could do better for online eye glasses sales and make them to follow the same rules we are providing for customers, it's not fair for us to pay for licenses fees and doing credits but the online seller are nor counted for their public health and regulations.	5/4/2023 2:36 PM
21	The registration committee at the COO must deliberate on a policy that encourages registered opticians to become contact lens mentors. Students have difficulties finding a place where to intern and gain in field experience. For years now and worsened by the pandemic period, optician led practices are loosing contact lens business and specific experience.	5/4/2023 2:17 PM
22	Log book is unprofessional and insulting to the profession....We are not students..Its unfair to the employer to have Opticians take time away from dispensing to complete tasks for the College to prove your dispensing.... I disagree with this specific requirement, also the amount of RGP being worn have diminished.....I work in a multidisciplinary environment...We have seen a total of 6 RGP fits in a year.....How are all these Opticians going to find fits....Maybe we can fit all of our family members and fill our books...nonsense	4/29/2023 3:23 PM
23	Although I beleive 5 rigid fits must remain part of the practicum, I would suggest that these be allowed to be completed with peer-to-peer assessments as it can be a challenge to find real cases. If scleral or ortho-k are acceptable for rigid fits it would be recommended to make this clearer in the documentation. Lastly, I would recommend that a minimum of toric and presbyopic contact lens fits be completed just as it's done in glasses (ex: minimum of 2 toric CL fits and 2 presbyopic CL fits)	4/28/2023 3:08 PM
24	Think it's a good idea	4/23/2023 8:41 PM
25	Not all optical clinics are able to accommodate for the required practicum elements. RGP contact lens fittings are not offered where I work, therefore, I would not be able to complete this part of the practicum. Therefore I would fail the practicum.	4/19/2023 8:19 PM
26	will this create additional time to evaluate per candidate and if so have we thought about the administration part?	4/19/2023 11:18 AM
27	It's difficult to find fits for RGP's	4/18/2023 11:30 PM
28	Contact lens fitting in Ontario supervise by a contact lens mentor is not necessary. Rigid gas permeable contact lens fittings can be optional or 25 contact lens fittings in total.	4/18/2023 11:57 AM
29	The explanatory document is very clear	4/17/2023 8:31 PM
30	No change is recommended	4/17/2023 10:54 AM
31	Dear sir/Madame I have experience in optometrist and optical in Sri Lankan and Canadian experience I am working at Hoya Vision Care Canada mississauga as a finishing technician for December 20th 2021 Thanks	4/17/2023 8:17 AM
32	No comment	4/16/2023 9:53 PM
33	To be more professional for the unactive optician who might need to have Peer & practice Assessment It is ridiculous for all licence Optician who completed the professional portfolios requirement to do so. We just start to have normal life of opticiary field in 2023.	4/16/2023 3:26 PM
34	rigid should not be a requirement as they are specialized today. most c/l fit the needs of most patients. I have heard from numerous dr stating the same. Some dr have not even fit rigid!!!! Why test on something specialized and make it like refraction as a technical certificate option!!! I have also heard from nacor examiners that they are petitioning the gov to exclude rigid from the practicum its a specialty now! Evolve to todays needs as a college!	4/15/2023 1:30 PM

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35	RGP is a ridiculous requirement. Way to difficult to find this amount.	4/15/2023 1:26 PM
36	It is pretty reasonable and very clearly stated.	4/15/2023 8:46 AM
37	Sometimes will be difficult find 5 rigid contact lens fits, suggest giving a longer time frame to accomplish.	4/14/2023 8:10 PM
38	I think expecting contacts fittings to be fitted by all opticians is unnecessary some of us don't fit contacts Time for me to retire	4/14/2023 4:35 PM
39	Finally you are bringing this back. I had to do this in the '90s. Wasn't sure when or why this was taken away. This is the only way to properly prepare a person to dispense with confidence and have candidates take their training seriously. Bravo for doing this.	4/14/2023 4:16 PM
40	Everything is fine except for the fitting of the five hard lenses which alot of fitters don,t like to do and we refer to another fitter. Which means we are honest.	4/14/2023 4:08 PM
41	The RGP requirement does not make sense for the majority of Opticians and would remove.	4/14/2023 4:02 PM
42	none	4/14/2023 3:46 PM
43	The rigid contact lens fitting is useless , only optometrists that specialize in rigid fit, it's near impossible to find and sign off on those fits, FYI I've been licensed 30 years and owned and run my Jen clinic 30 years , no one in my area of Ontario fits rigid , all other aspects of the practical are fine , an optician has. I place fitting a rigid ocular device without the exam of an optometrist anyways ,	4/14/2023 3:38 PM
44	Contact lenses should be a separate area as the practical requirements have to take in expertise from basic fitting (soft spherical) to expert fitting (keratoconus and scleral lens fitting including ortho-K and irregular cornea fittings) The latter are barely covered in an overcrowded syllabus) Make these optional and provide the necessary upgrades for those wishing to pursue the above.	4/14/2023 2:56 PM
45	I dont think that it is necessary since we already did 1000 hours and fittings in seneca	4/14/2023 2:32 PM
46	Based on my experience in an optometry office with 4 doctors, I see there is no any RGP fit for patients, just rarely doctors have scleral lenses, so I actually found my cases for RGP fit arduously. Anyway I appreciate all outline in my co-op which helped a lot to be more experienced at the time of being a registered optician.	4/14/2023 2:28 PM
47	The RGP requirement is very challenging for the students to get. The college needs to be aware of this obstacle to achieve the license and find a way to make sure the students are educated and able to dispense these contacts, but also give them direction to achieve this, and not to send them to find an RGP dispensary, out in the open market, to get their 5 fits	4/14/2023 2:23 PM
48	I am concerned about the 5 RGP fittings as very few places offer the service. I was trained in an optometrist office for RGP and have only worked at 1 place that offered RGP lenses. I have been in the industry for 30+ years. What happens when no one can get their 5 fits per year?	4/14/2023 1:45 PM