

Date: November 7, 2018  
Revised: November 15, 2018 (Consultation Period Extended)

To: Members & Stakeholders of the College of Optometrists of Ontario  
From: Dr. Pooya Hemami, President  
**Re: Recommendation for Council to Approve National Board of Examiners in Optometry (NBEO) Examination as an Alternate Standards Assessment Required for Registration in Ontario.**

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In 2015 and 2016, the College expressed, to OEBC (at the time, called CEO-ECO), its disapproval and disagreement with some aspects of the proposed OEBC exam.<sup>1</sup> The College issued a request-for-proposals (RFP) for the development of an alternate Canadian examination in late 2016. OEBC launched its new examination in spring 2017.

Several provincial regulators, including Ontario, felt that a process was lacking for OEBC's members (owners) to have any tangible control over broad aspects of the organization and its main product (the OEBC exam). The College, and certain other regulators, believed that placing provincial registrars, or their optometric regulatory council representatives, on the Board of Directors of OEBC would be the best way to effect substantial changes in the OEBC OSCE examination. The OEBC members hence decided in June 2018 to replace the entire OEBC Board with provincial registrars from each province (in Quebec, the chair of Quebec's Registration committee was elected to the board).

Unfortunately, there is little evidence that the College's concerns are being considered by the new OEBC board, and it has become apparent that the majority of OEBC's directors may not share the College's view regarding the OEBC exam. At this juncture, it appears unlikely that definitive changes to the exam will be undertaken to address the College's concerns within its desired timeframe.

Given this backdrop, the Executive Committee decided to revisit accepting the NBEO as an alternate standards assessment option, in order to provide candidates with improved choice, accessibility and flexibility. This is not a new concept, as over the last number of years, the College has already considered accepting the NBEO exam as either an alternate entry to practice exam or as the only exam

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<sup>1</sup> From the [OEBC Candidate Instructions & Written Guide](#), "The OSCE involves no direct contact on the standardized patient. If there are required tests or procedures in an OSCE station they will be performed on a model."

approved by Council. In June 2013, a motion to accept NBEO was defeated by Council by a single vote, but the concept continued to be alive over the subsequent years.

In the past eight years (2010-17), over 44% of new registrants that are graduates of ACOE optometry schools received their optometric education in US optometry schools. Further, given that BC and QC already accept the NBEO as an entry-to-practice exam, graduates who pass this exam can already apply to register in Ontario (through labor mobility provisions) without completing the OEBC exam. Accordingly, there may now be a stronger argument to accept the NBEO for fairness and accessibility considerations than in previous years, provided that Council is confident that the NBEO is a robust, valid and defensible entry-to-practice examination.

The Registration Committee reviewed the NBEO when it sent some of its members to visit their clinical testing facility in August 2017. In addition, the NBEO has broad acceptance by all 50 US states (including those with broader scopes of practice than Ontario), and the exam has robust oversight through NBERC. On October 22, 2018, the Executive Committee requested that the Registration Committee conduct a comparison of both the NBEO and OEBC exams to determine if a candidate who successfully challenged the NBEO exam would be reasonably expected to provide, at a minimum, a similar assurance of entry-level optometric practice competency, as a candidate who successfully challenges the entirety of the OEBC examination (OEBC written + OSCE). In short, it was “the overall opinion of the Registration Committee that based on a high-level review of the OEBC’s Competency Profile, the NBEO Content Matrix, and general clinical skills assessed (directly/indirectly), that the NBEO examination is at least comparable to the current OEBC examination process”.

Based on the forgoing, the Executive Committee has recommended that Council approve the NBEO examination for registration purposes as a standards assessment approved by the College. Applicants could choose between challenging either the NBEO or OEBC exam for the purposes of registration with the College. This decision provides an alternative exam for applicants. Council met on the evening of Monday November 5, 2018 to discuss the Executive Committee’s recommendation. Following a fulsome discussion, Council agreed, in the interest of fairness and transparency, that stakeholders be given the opportunity to respond to this recommendation.

The consultation period has been further extended. If you wish to provide Council with a submission in this matter, please do so no later than **Friday, January 4, 2019**. A response can be submitted via mail, fax or e-mail; details provided below.

If you have any questions, please feel free to contact College Registrar, Dr. Paula Garshowitz, ahead of the date.

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