

MEMORANDUM

Date: Dec. 14, 2018

To: Dr. Pooya Hemami, President

CC: Ms. Hanan Jibry, Assistant Registrar & Support Staff, Registration Committee

From: Dr. Patrick Quaid, Chair, Registration Committee

Re: **Response to Stakeholder and Member Feedback associated with the Consideration of National Board of Examiners in Optometry (NBEO) Examination**

This memorandum provides a summary of the results of the first opportunity to observe the Optometry Examining Board of Canada (OEBC) examination by two members of the Registration Committee (Committee) on Nov. 3, 2018; the Committee met on Dec. 7th to discuss these observations. The Committee also feels that it is important to provide a response to some of the points raised in the input received from many stakeholders and members in order to provide clarification as well as correct some inaccuracies contained in the feedback.

1. OEBC Examination Observation

Having reviewed and considered the results of the OEBC examination, it is the opinion of the Committee that:

- The OEBC and National Board of Examiners in Optometry (NBEO) are different examinations, and they measure candidate competence in different ways.
- The Committee has confidence in candidates who have successfully challenged either examination with respect to entry-level competence and therefore, public safety.
- The 'new' OEBC examination may identify borderline candidates better than the past Canadian Assessment of Competency in Optometry (CACO) examination, as the exam administered by the same organization used to be called. Based on the Committee's unfettered exam observations at the July 2017 NBEO exam site visit, the Committee believes that the NBEO examination in its current state, also discriminates borderline candidates well.
- The Committee will be more confident having an oversight committee for the OEBC examination.

2. Response to Stakeholder and Member Input

The following is in response to some of the points raised in the stakeholder and member input:

- The Committee's request for unfettered access to the OEBC examination has been an ongoing issue despite the ability of two members of this Committee to observe the November 2018 OEBC examination as mentioned in the OEBC Nov. 5, 2018, letter to the College Council. Numerous previous requests for exam observation by the College, had not resulted in a satisfactory response from OEBC.
- OEBC changed the entry-to-practice exam without informing the College. This was pointed out in the May 26, 2017, letter from the College to OEBC. On Nov. 21, 2016, the College sent a letter to the predecessor of the OEBC, Canadian Examiners in Optometry, specifically seeking information about how the piloting of the new entry-to-practice exam was going to be implemented. The College did not receive a satisfactory response to this request. In contrast, NBEO is hiring a project manager to manage the review of Part 3 of the NBEO examination with full stakeholder oversight.

- NBEO has indicated to the Committee that it is the 'gatekeeper' since different optometry schools accredited by the Accreditation Council on Optometric Education (ACOE) are not consistent in the exit exams they administer. Accordingly, for consistency, public safety, and to ensure fairness in the manner an exam is applied, it is important to test for certain critical skills at every exam administration.
- OEBC uses a combination of standardized patients and models in its OSCEs. It is important for examiners to observe patients' reaction to the technical skills being performed by candidates in conjunction with videotaping. NBEO has informed the Committee that it has managed the risk with having live patients involved in its exam for many years without issue. A decision is therefore needed about whether the use of standardized patients is preferred versus models in the entry-to-practice exam approved by the College, going forward.
- In response to the point made about the nursing profession using a US-based licensing exam, the Registrar of the College of Nurses of Ontario assured College staff as recently as this week that the exam is 'absolutely' meeting the College's requirements for validity, reliability, and defensibility.

Conclusion

The Committee would like to affirm its support in principle for a Canadian bilingual entry-to-practice exam. It is aware that there does exist a significant cost difference between the OEBC and NBEO exams. However, the Committee's mandate regarding the exam is not cost; rather it is the defensibility of the exam. Based on existing legislative requirements (Section 22.4 (2) of the *Health Professions Procedural Code*), the College is duty-bound to ensure that proper oversight is maintained with respect to any approved entry-to-practice examination.

The following are the potential options to resolve the present situation:

- a) Approving the NBEO exam as an alternate entry-to-practice exam;
and/or
- b) Establishing a truly independent and competent oversight committee of the OEBC exam process to provide expert oversight in line with regulatory requirements (i.e. independent of OEBC and anyone who is or has been in the past, remunerated directly or indirectly by OEBC). This Committee should be appointed by OEBC members which would emulate the role of the ARBO/NBEO model or National Board of Examination Review Committee (NBERC), and it should be able to report back to all regulators in an unfettered manner. If this option is pursued, a strict timeline should be followed in the formation of the Committee.