



OPTOMETRY EXAMINING
BOARD OF CANADA

BUREAU DES EXAMINATEURS
EN OPTOMÉTRIE DU CANADA

January 8, 2019

To: OEBC Stakeholders

Dear OEBC Stakeholders:

The Optometry Examining Board of Canada (OEBC) understands that the College of Optometrists of Ontario (the College) will be voting to permit optometry school graduates the option of taking the U.S. National Board of Examiners in Optometry (NBEO) examination as a condition for registration (licensing) in Ontario.

OEBC prepared and sent an initial response to stakeholders on November 19 2018 and a response to the College on December 19 2018 about its concerns with this potential development.

As part of OEBC's commitment to transparency to its stakeholders including candidates, these OEBC letters are enclosed. Stakeholders may also find information about this matter on the College of Optometrists of Ontario's website at www.collegeoptom.on.ca.

Sincerely,

Tami Hynes
CEO



December 19, 2018

To: The Council of the College of Optometrists of Ontario

Re: Recommendation for Council to Approve National Board of Examiners in Optometry (NBEO) Examination as an Alternate Standards Assessment Required for Registration in Ontario

Dear Council Members:

The Optometry Examining Board of Canada (OEBC) understands that the College of Optometrists of Ontario (the College) will be voting to permit optometry school graduates the option of taking the U.S. National Board of Examiners in Optometry (NBEO) examination as a condition for registration (licensing) in Ontario.

We are writing to you because OEBC has some serious concerns about this potential development. These concerns include ceding control of the entry-exam for the Ontario optometry profession to a foreign country and foreign practitioners, and adopting an exam that is not reflective of the profession of optometry in Canada. Further, the option to allow candidates to take the U.S. exam will result in the likely demise of OEBC, and the subsequent loss of the Canadian English and French exams.

The specifics of our concerns are outlined below.

Ontario's acceptance of the NBEO will forfeit a Canadian exam for all provinces

Two other provinces now accept the NBEO exam, however, the economic impact to OEBC has been marginal. Ontario's acceptance of the U.S. exam will most likely result in the elimination of a defensible Canadian optometry licensure exam in both English and French.

The U.S. exam is less expensive primarily due to economies of scale. It will therefore likely be the exam of choice for a large percentage of candidates wishing to practice in Ontario. The exception will be French language candidates who will still need a Canadian exam since the U.S. exam is not offered in French.

Proposing that the OEBC exam remain an option for those who wish to take the Canadian English or French exam assumes that OEBC will remain operational. OEBC cannot survive with a drastic drop in candidates - including the U.S. educated candidates who now take the OEBC exam for practice in Canada, but may end up taking U.S. exam instead. The decrease in both candidates and associated revenue for OEBC puts the future of a Canadian exam in English and French at risk.

Accountability

The College of Optometrists of Ontario is an owner of OEBC and selects a member to occupy one of the 10 seats on the board. The board members have direct input into OEBC's goals which govern day-to-day operations. By way of contrast, the College would have very little influence on the policy directives of the NBEO.

Examination practices for other Canadian health professionals

Health professions in Canada have examinations established and administered by Canadian examining boards and reflective of the content and nature of the Canadian practice. An exception is the nursing profession where provincial regulatory bodies outside Quebec began using a U.S. licensing exam in 2015. This decision was also made to improve accessibility and convenience. Pass rates on the U.S. exam for new Canadian graduates plummeted by nearly 20 per cent (higher on the French exam) compared to previous pass rates on the Canadian exam. This is likely due to the fact that the U.S. exam is designed to reflect the nature of American – and not Canadian – nursing practice. We understand that nursing schools across Canada are now urging regulatory agencies to abandon the U.S. exam and return to a Canadian one.

Exam validity and reliability

OEBC follows the 2014 *Standards for Educational and Psychological Testing* to deliver a valid and defensible exam for entering optometry practice in Canada. The OEBC exam verifies that an individual has the competence for entry to practice in Canada. The exam results are reliable, valid, and legally defensible in the Canadian context. This is not the case with the NBEO exam, which has been designed to reflect the nature of American practice.

OEBC reports annually on exam validity and reliability. These reports, and other documents, show that the OEBC exam:

- 1) is based on the national competencies developed and validated by optometrists across Canada;
- 2) adheres to the OEBC blueprint specifications developed from the national competencies;
- 3) contains content written and reviewed by Canadian practicing optometrists. The content reflects everyday professional and clinical scenarios;
- 4) is standardized. Comparable to exams for other Canadian health professions, the OEBC assessment of competence allows all OEBC candidates to have the same test experience;
- 5) is scored by qualified psychometricians using standardized data analysis.

Comparison with American (NBEO) exam

The NBEO exam does not meet the first step of defensibility for a Canadian optometry licensure exam because it does not reflect practice in Canada or the competencies the profession has set out for

entering practice in Canada. A review of the NBEO skills exam by OEBC subject matter experts finds the published NBEO skills outline does **not** address the following:

- It does not assess several competencies in Canada’s patient-centred approach to care – such as responding to patients’ physical, emotional, intellectual and cultural backgrounds; shared decision-making processes with the patient; and involving patient's family and support persons in care decisions where appropriate;
- It does not assess several competencies in diagnosis and planning – including recognizing urgent medical conditions and responding accordingly; recognizing possible systemic conditions that require assessment by other health care professionals; and recognizing and responding to the complexities and ambiguities inherent in diagnosis and treatment;
- It does not fully assess any patient management competencies;
- It does not assess several competencies in communication – such as selecting a communication style appropriate to the situation; applying conflict resolution strategies; and delivering bad news sensitively and effectively;
- It does not assess maintaining professional boundaries.

Based on information from Canadian optometrists who have worked in the US as well as recent research papers, OEBC does not believe that the NBEO exam can reflect Canadian practice. This is because legal, ethical and public health issues are different in Canada.

In addition, since the NBEO allows for six reassessment attempts before an appeal – while OEBC allows only four – there is no way to prevent a candidate from making six NBEO attempts and then beginning OEBC exam attempts. This is a concern from a public safety perspective.

Fairness for exam candidates

The OEBC exam meets the four principles of sound assessment: fairness, objectivity, impartiality and transparency. A 2018 independent review, conducted by the former executive director of the Office of the Fairness Commissioner (OFC) of Ontario, found that the OEBC exam information on its website meets the four OFC principles.

The OEBC exam meets the four sound assessment principles because it:

- 1) delivers the exam in the two official languages, English and French;
- 2) has a standardized exam, with all candidates having the same exam experience. The College noted in its 2015 (annual) report to the Ontario Fairness Commissioner that OEBC’s practical exam (Objective Structured Clinical Exam or OSCE) is fair, transparent and robust. Standardization includes a secure, accessible, and suitable physical site; trained examiners/proctors; clear scripted instructions to candidates; etc.;

- 3) aligns policies and procedures with the fairness positions of the Council on Licensure and Enforcement and Regulation (CLEAR), provincial Fairness Commissioners, and Ontario human rights legislation;
- 4) posts registration policies, procedures, schedules and other information on the OEBC website well in advance of exam administration – including test characteristics, test preparation, question evaluation, time limits, scoring, pass/fail standards, results reporting, scoring procedures, test administration, what can be brought to the test, etc.;
- 5) offers a process for candidates to request and receive disability accommodation, to provide an equitable exam to all exam candidates;
- 6) provides individualized information promptly to candidates about exam results, retaking the exam, and appealing results;
- 7) includes a three-tier “legal hearing” process for candidates to appeal any decision of OEBC;
- 8) does not replicate the format of the evaluating exam created by the College. This issue is monitored by provincial Fairness Commissioners;
- 9) avoids real or perceived conflicts of interest – in that optometry educators are not permitted to write or select content for the OEBC exam. This protects the exam integrity.

Providing applicants a choice of exam based on convenience

In an FAQ document on its website, the College has proposed to accept the NBEO exam *“to improve choice, accessibility and flexibility for applicants seeking registration with the College. Approving an alternate exam will provide applicants with the option to take either the Optometry Examining Board of Canada (OEBC) examination or the NBEO examination to fulfill this registration requirement.”*

OEBC is not aware of other Canadian health professions that base their licensure exams on convenience. Nor have optometry students expressed concerns to OEBC that our exam is inconvenient. OEBC provides exams in two major urban centres - Hamilton (written and OSCE) and Montreal (written) – balancing cost and access. NBEO offers its practical exam in only one US location which can certainly not be considered “convenient” for many candidates.

OEBC offers two examinations per year. As is common in Canada with other health professional examining bodies, OEBC exams are held near graduation in the spring and fall to allow failed candidates adequate time to prepare for a retake.

Video recording

It is our understanding from the College’s registration committee chair (as reported in the November 5, Council meeting materials) that the registration committee has concerns that the lack of video recording makes the OSCE less defensible. OEBC has multiple other methods in place to ensure exam defensibility - including using multiple examiners, in-depth examiner training, various levels of

statistical analysis and incident reporting. A decline in exam appeals since OEBC's May 2017 exam demonstrates that these protocols ensure exam integrity and fairness to candidates.

Live subject examination

There has been absolutely no source or evidence provided for the College's position that live subjects are preferable in an exam. The current trend in high-stakes testing is to move away from the use of live patients whenever possible, since their use creates significant challenges for standardization and therefore fairness, defensibility and reliability. The NBEO itself has elected to use simulations – instead of live subjects - for some aspects of its exam.

Business model

In Canada, entry-to-practice exams are commonly developed and offered by not-for-profit organizations that offer a valid and reliable entry exam at a reasonable cost. OEBC's business model, like those of other Canadian testing boards, depends on the fees for the written exam to supplement the labour (and cost) of the intensive practical exam. The drive to maximize profit may lead to cost saving measures that compromise exam validity, reliability and fairness. NBEO's for-profit external company had two serious delivery issues in 2017 as a result of implementing computerized testing.

Summary

It is in the best interest of public safety that Canadian optometrists have satisfied the competency requirements identified by the Canadian profession of optometry. It is in the best interest of the Canadian profession that Canadian practitioners are the sole agents who directly influence and shape the nature of the entry to practice exam in this country.

The College's acceptance of the U.S. (NBEO) exam will result in:

- 1) An exam that does not reflect the landscape of optometry practice in Canada, and is therefore not valid and legally defensible in the Canadian context.
- 2) An exam that does not meet the four principles of sound assessment for Canadian candidates.
- 3) The likely elimination of an option for candidates to take a Canadian exam – in English or French – since OEBC will no longer be a viable organization.

In summary, we strongly urge the College to reject a proposal that would enable optometry school graduates and others seeking registration in Ontario the option of taking the NBEO exam.

Sincerely,



Lorne Ryall, OD
Chair



Tami Hynes
Chief Executive Officer

CC Ms. Allison Henry, Ontario Ministry of Health and Long-Term Care
Mr. Christopher Rosati, Office of the Fairness Commissioner, Ontario



November 14 2018

To: Stakeholders of Optometry Examining Board of Canada

Dear Stakeholders:

The Optometry Examining Board of Canada (OEBC) has recently been made aware that the College of Optometrists of Ontario (COO) will soon be voting on permitting optometry school graduates the option of taking the U.S. National Board of Examiners in Optometry (NBEO) examination as a condition for registration (licensing). The Ontario college, along with other Canadian provincial optometry regulators, stipulate that graduates wishing to practice optometry take the OEBC exam.

We understand that by far the greatest number of optometrists entering the profession in Canada end up practicing in Ontario. Permitting those graduates wishing to be registered in Ontario the option of taking the U.S. exam will diminish the number of OEBC candidates and threaten the existence of the Canadian examining board.

OEBC wishes to advise Ontario optometrists, and optometry schools and students of the following:

- The OEBC exam is created by Canadian optometrists for practice in the Canadian health care environment.
- In creating the OEBC exam, optometrists follow independent standards for reliable and valid exam results, fairness and defensibility.
- Due to economies of scale and other factors, the U.S. exam is less expensive and will likely be the exam of choice for a large percentage of candidates wishing to practice in Ontario. The exception will be French language candidates who will still need to take the Canadian exam, since the U.S. exam is not offered in French. The decrease in candidates and the associated decrease in funding for OEBC puts the future of this organization - and a Canadian exam in English and French - at risk.
- Health professions in Canada have examinations established and administered by Canadian examining boards. An exception is the nursing profession where provincial regulatory bodies outside Quebec began using a U.S. licensing exam in 2015. As a result of various issues, we understand that nursing schools across Canada are now urging regulatory agencies to abandon the American exam and return to a Canadian one.
- The OEBC exam is fair, valid and accepted by all provincial regulators, including the College of Optometrists of Ontario.

- The OEBC exam's assessment of competencies is comparable to Canadian high-stakes exams for other Canadian health professions, ensuring exam validity and defensibility.
- A 2018 independent review also found OEBC exam information meets principles set out by the Ontario Fairness Commissioner, including that the exam process is transparent, objective, impartial and fair.
- OEBC exam policies on accommodation balance exam integrity with duties under the Accessibility for Ontarians with Disabilities Act and Ontario Human Rights code.
- For the past 22 years, thousands of optometrists across Canada have demonstrated a strong commitment to the OEBC and the exam process.
- The College of Optometrists of Ontario is one of the 10 owners of OEBC, and elects a member to occupy one of the seats on its board. The Ontario college would have very little influence on the policy directives of the NBEO since all board members are U.S. based.
- Should the Board of Directors of the OEBC express any concerns about the organization's examination or process, appropriate changes can be made to accommodate the board's directives.

The College of Optometrists of Ontario is now seeking comments from stakeholders about its proposed change to examination requirements for registration, with a deadline for comments of Wednesday, December 5, 2018. Stakeholders are invited to write or email the college at:

900 – 65 St Clair Ave E
Toronto, ON M4T 2Y3
Fax: 416-962-4073
Email: feedback@collegeoptom.on.ca

The Optometry Examining Board of Canada is requesting to be copied on all correspondence, which can be directed to:

7 Sandiford Drive, Suite 403
Stouffville, Ontario L4A 3Z2
Fax: 905 641 3786
Email: exams@oebc.ca

The OEBC would appreciate the support of our stakeholders in providing comments about this pending development. Thank you in advance.

Sincerely,



Dr. Lorne Ryall, OEBC Chair