PROPOSED REGULATORY FRAMEWORK FOR OPTOMETRISTS AND OPTICIANS IN SINGAPORE

PUBLIC CONSULTATION PAPER

MOH
SEPTEMBER 2005
The Ministry of Health seeks the public’s views, comments and feedback on the proposed establishment of the regulatory framework for optometrists and opticians in Singapore.

Please submit your feedback by 24 October 2005 in the following ways:

a. Access the feedback form on-line at www.moh.gov.sg; or

b. Send an e-mail to MOH_INFO@moh.gov.sg with the following
   i. Reference – Feedback on Optometrists and Opticians
   ii. Information requested in the feedback form preferably in the same format; or

c. Detach or print the feedback form and mail/fax it to:
   Director
   Professional Standards and Development Division
   Ministry of Health
   16 College Road
   Singapore 169854
   Fax: 6325 9211
I. EXECUTIVE SUMMARY

Introduction
1. The Ministry of Health is proposing to implement a statutory regulatory framework to regulate the practice of optometry and opticianry in Singapore.

Reason for and Benefits of a Statutory Regulatory Framework
2. Given the high prevalence of myopia and rapid aging of our population, we need properly trained optometrists and opticians to ensure high standards of eye care.

3. With the implementation of a statutory regulatory framework, the public can benefit from better eye care as we enhance our capacity for eye care in the community. Individuals requiring eye care services can be assured that they are served by properly trained and certified optometrists and opticians. A system to discipline errant practitioners will be put in place. Optometrists and opticians will also benefit from regulation as it will assist in the development of their profession.

Proposed Framework
4. MOH proposes that an Optometrists and Opticians Board (OOB) be set up to register optometrists and opticians, set professional guidelines and initiate disciplinary action against errant practitioners. It will determine the necessary qualifications for registration and oversee continuing professional education for optometrists and opticians.

5. In designing the proposed framework, MOH recognizes the need to ensure that the livelihoods of current practitioners are not affected. All currently practicing contact lens practitioners will be registered as optometrists or opticians. Opticians with practical experience in refraction and general opticianry but have no formal qualifications will also be eligible to apply for registration. MOH will help them attain the necessary standards through an upgrading course which will be tailored to suit their needs. The length and scope of this course will be kept to reasonable standards.
Both opticians and optometrists would be allowed to continue most of their current scope of practice. This includes refraction and dispensing of spectacles to adults and children from Primary Two and above which makes up the bulk of their current practice. However, MOH proposes that children in Primary One or younger who require refraction should be seen by either an ophthalmologist or an optometrist. Optometrists can also conduct basic eye screening and basic eye care if they have been properly trained to do so. However, they must still refer patients with conditions requiring medical or surgical management to an ophthalmologist or an appropriate medical practitioner immediately upon suspicion or diagnosis.

**Implementation Timeframe**

MOH proposes that registration commence on 2 Jan 2007 and the new regulatory framework come into effect on 1 July 2007.

**Conclusion**

MOH feels that introducing a regulatory framework for optometrists and opticians will benefit both the public and the profession. We welcome and value your feedback on this proposed framework.

**II. INTRODUCTION**

**Aim**

MOH is proposing a statutory framework to regulate the practice of optometry and opticianry in Singapore.

**Background**

Unlike most countries, Singapore does not regulate its optometrists and opticians, other than those involved in the practice of contact lens fitting and dispensing.

In most developed countries like Australia, Canada, Hong Kong, UK and USA, the practice of optometry and opticianry is tightly regulated. In some countries, statutory regulation has been in place for more than 50 years.
12 In such countries, only those with the appropriate qualifications can register and practice as optometrists or opticians. In general, optometrists function as primary eye care providers, performing refraction, eye screening and basic eye care while opticians dispense optical aids. Errant practitioners can be disciplined by their respective regulatory agencies.

13 This is not so in Singapore. Traditionally, practitioners learn their trade through apprenticeship and a small number were trained overseas. However, this situation started to change in the 1990s when Singapore Polytechnic started courses in optometry.

**The Contact Lens Practitioners Act**

14 MOH is aware of the need to maintain standards in the optometry and opticianry profession as improper optometry and opticianry practice can pose a risk to the public. In 1996, MOH took steps to regulate some aspects of optometry practice through the Contact Lens Practitioners (CLP) Act. This was because inappropriate fitting of contact lenses can potentially cause severe complications like corneal ulcers which can result in blindness.

15 Today, some of these practitioners are partially regulated through the CLP Act. Those with the appropriate qualifications recognized by the CLP Board can apply for registration. Only registered CLPs can call themselves as such and engage in selling contact lens. The CLP Act also empowers the CLP Board to inspect premises where testing of sight and fitting of contact lens are conducted.

16 However, optometry and opticianry practice outside of this Act (e.g. refraction, eye care and dispensation of spectacle lenses) is not regulated.

17 The CLP Act has set the groundwork to now go to the next step of regulating the other aspects of optometry and opticianry practices.
18 Conditions are also conducive for such a development as we now have a critical mass of around 500 well-trained optometrists. This is made possible, because we took a major step in 1990 when the Singapore Polytechnic started courses in Optometry.

**Need for Further Regulation**

19 Myopia is a major visual problem in Singapore. Accurate correction of myopia is important in maintaining quality of life and reducing the impact of this disorder. We need well-trained optometrists and opticians to ensure that we continue to enjoy high standards in refraction and dispensing of optical aids.

20 Singapore is also encountering an ageing population with increasing prevalence of age-related eye disorders. Optometrists can provide services like eye screening to ensure that eye conditions are detected early.

21 MOH is moving towards right-siting of services. It is less costly for optometrists to provide these services in a community setting. We need to enhance our capacity for community eye care in the long run and this is a step in that direction.

22 The aim of the proposed regulatory regime is thus to better serve the public and the profession.

23 First, the public will benefit from better eye care as regulation will raise the overall standard of eye care by (a) setting entry standards into the profession, (b) ensuring acceptable standards of practice and (c) encouraging optometrists and opticians to keep up-to-date with the latest developments in their field.

24 Customers requiring eye care services e.g. refraction can be assured that they are served by properly trained optometrists and opticians. Trained optometrists and opticians can also play a role in patient education. A system to discipline errant practitioners will be in place.
25 Second, optometrists and opticians will benefit as regulation will help promote the development of their profession. It will ensure that practitioners (a) have more opportunities to upgrade and keep abreast of new developments and best practices in their field, and (b) are responsible for their professional practice.

III. PROPOSED FRAMEWORK

General Principles
26 In developing the regulatory framework, the following principles will apply:

a. It must fulfill its function of ensuring high standards of eye care and protecting the public;

b. It should not affect the livelihood of current opticians and contact lens practitioners who may not have the necessary qualifications for registration but are otherwise competent in their area of work;

c. It must be inclusive and not protectionist in nature;

d. It should not increase the cost of visual aids like spectacles and contact lens significantly;

e. It should not unnecessarily induce demand for eye screening and other eye care services;

f. Continuing Professional Education (CPE) will be an integral component.

Legislation
27 MOH proposes that an Optometry and Opticianry Act replace the current CLP Act. It will incorporate the relevant parts of the CLP Act.

The Optometrists and Opticians Board (OOB)
28 An Optometrists and Opticians Board (OOB) will be set up in place of the CLP Board. It will have powers to register those involved in providing eye care (except medical practitioners and nurses), set professional guidelines
including those with respect to continuing professional development and pursue disciplinary action against errant practitioners.

29 The OOB will establish a Register of Optometrists and a Register of Opticians. A sub-register of opticians who are licensed to fit and dispense contact lens will also be set-up; but once established, this sub-register will be closed. The following criteria should be fulfilled for registration in the 2 registers:

<table>
<thead>
<tr>
<th>Register</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Optometrist</td>
<td>i. Diploma or above in optometry as determined by the OOB and 1 year of practice experience; OR</td>
</tr>
<tr>
<td></td>
<td>ii. Certificate in Contact Lens Practice (or equivalent) issued by Singapore Polytechnic and conditions attached by the OOB.</td>
</tr>
<tr>
<td>Optician</td>
<td>i. At least 2 years of experience in refraction and general opticianry immediately prior to 1 Jan 2007; AND conditions attached by the OOB; OR</td>
</tr>
<tr>
<td></td>
<td>ii. Other qualifications as determined by the OOB</td>
</tr>
<tr>
<td>Optician (Contact Lens)</td>
<td>Certificate in Contact Lens Practice (or equivalent) issued by Singapore Polytechnic*</td>
</tr>
<tr>
<td>sub-register</td>
<td>* Not offered anymore</td>
</tr>
</tbody>
</table>

Types of Registration

30 There will be 3 types of registration for each register.

a. **Full Registration** in the Register of Optometrists and Register of Opticians will be given to those who fulfill the above criteria. They will be allowed to practice independently.

b. **Provisional Registration** will be offered to applicants to the Register of Optometrists who have obtained their formal
qualification(s) in optometry but have not gained at least a year of practical experience as certified by the OOB. Provisionally registered optometrists are only allowed to practice under the supervision of a fully registered optometrist. After they have satisfactorily fulfilled the practice experience criteria, they can apply to convert their registration status from Provisional to Full. Graduates of recognized foreign universities who can demonstrate a similar period of apprenticeship overseas can apply for full registration. (There is no provisional registration for opticians as applicants must have either had at least 2 years of experience in this field, or have obtained a vocational qualification.)

c. Conditional Registration in the Register of Opticians or Register of Optometrists will be given to practitioners who have fulfilled part of the criteria and are judged to be competent by the OOB to practice independently. During the period of conditional registration, they must meet the conditions stipulated. This category applies to applicants who have at least 2 years of experience in refraction and general opticianry immediately prior to 1 Jan 2007. More details are given in Section V. After completing the relevant requirements, these practitioners can apply to convert their registration status from Conditional to Full.

Practicing Certificate/License
31 All practitioners will have to pay a licensing fee in order to practice. A practicing certificate or license will be issued and it has to be displayed prominently at the practitioner’s place of practice. This is not a new or arbitrary requirement as all healthcare professionals including current Contact Lens Practitioners have to pay licensing fees.

32 The practicing certificate or license has to be renewed every 2 years pending completing of necessary CPE requirements and payment of the necessary renewal fees. The licensing and renewal fees will be set at an affordable and reasonable level.
New Entrants

33 Entry-level courses in optometry will continue to be offered in Singapore. Foreign optometry courses may also be accepted by the OOB as basis for registration in the Register of Optometrists. In addition, MOH will also work with the industry stakeholders to develop a vocational course for new entrants to the opticianry profession if there is demand. Details will be released when they are available. Other foreign qualifications may also be recognized by the OOB as basis for registration in the Register of Opticians.

Ethics and Professionalism

34 The OOB will be responsible for determining what constitutes acceptable ethical and professional standards among practitioners. The Ministry of Health or any member of the public can lodge a complaint with the OOB if it has reason to believe that a practitioner has been unprofessional in his/her conduct. The OOB will investigate the complaint and will have the power to impose punitive measures. This is consistent with the regulatory framework of other healthcare professions as well as other international optometry or opticianry regulatory framework. It ensures that there is professional accountability on the part of the practitioner.

Oversight

35 For a start, the OOB members will be appointed by MOH. In future, there might be an elected component of the OOB. MOH will retain oversight of the OOB to ensure that its actions are aligned with national interests.

Practice Issues

Place

36 Practitioners can apply to practice at up to 3 locations, similar to the current CLP regulatory framework. A practicing certificate/license with a recent photograph must be displayed at each premise.
Refraction
37 Opticians and optometrists will be allowed to perform refraction on adults and children from Primary Two and above. Children in Primary One and below requiring refraction should be seen by either an ophthalmologist or an optometrist. This is because it is difficult to accurately refract patients in this age-group. In addition, proper training is essential to detect certain conditions that might alter the management of such patients. However, as the bulk of practice in refraction relates to the former group, the impact on current practitioners is expected to be minimal.

Contact Lens Practice
38 Contact lens practice relates to that currently regulated under the CLP Act. All currently registered CLPs will be allowed to continue fitting and dispensing contact lens, the scope of which is defined in the CLP Act.

Basic Eye Screening and Basic Eye Care
39 Optometrists can conduct basic eye screening and basic eye care if they have been properly trained to do so. All conditions requiring medical or surgical management must be referred to an ophthalmologist or an appropriate medical practitioner immediately upon suspicion or diagnosis. Optometrists should take care not to perform unnecessary screening or diagnostic tests. The OOB will decide on what constitutes acceptable practices in this area.

Summary
40 The scope of practice for optometrists and opticians is summarized as follows:

<table>
<thead>
<tr>
<th></th>
<th>Dispensing spectacles</th>
<th>Refraction (&gt; 7 years)</th>
<th>Refraction (&lt; 7 years)</th>
<th>Contact Lens Practice</th>
<th>Basic eye screening, basic eye care</th>
</tr>
</thead>
<tbody>
<tr>
<td>Optometrist</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Optician (Contact Lens)</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Optician</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Continuing Professional Education (CPE)

The Rationale for CPE

41 CPE will be an integral part of any professional regulatory framework. As optometrists and opticians play an important role in the overall provision of eye care, they should keep up-to-date with new developments in their fields. They should also be well-versed in best practices and other internationally accepted norms. Again, this is not a new and arbitrary requirement; MOH has developed CPE requirements for other regulated healthcare professions e.g. doctors and nurses. Fulfilling the CPE requirements will be a pre-requisite for renewal of practicing license.

CPE Activities

42 CPE activities will include the following:
   a. Courses and Workshops
   b. Conferences and Seminars
   c. International meetings e.g. World Council of Optometry
   d. Talks organized by academic or trade institutions
   e. Self learning

43 Organizers of these CPE activities will apply to the OOB for accreditation of their CPE activities. In addition, the OOB will work with the different stakeholders in the industry to ensure that there are adequate CPE opportunities for practitioners.

Core/Non-core CPE

44 Core CPE refers to CPE activities directly related to the individual’s field of practice i.e. in optometry and/or opticianry. There will be no limit to core CPE activities.

45 Non-core CPE refers to CPE activities that while not directly related to the individual’s field of practice, are helpful for professional development. These could include activities to improve the practitioner’s professional
communication or business development skills. Non-core CPE should not comprise more than 30% of total CPE activities.

46 Practitioners can claim CPE points if they have participated in self-learning. These include reading articles in professional journals or practice guidelines; or participating in on-line learning schemes. The OOB will decide on the number of points awarded.

CPE Requirements

47 In general, 1 hour of learning translates into 1 CPE point, although this can vary according to circumstances. The CPE requirements for all practitioners will be 50 points every 2 years. Details for the 2-year cycle are as follows:

<table>
<thead>
<tr>
<th>Core</th>
<th>Non-Core</th>
<th>Self-learning (core topics)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>No limit</td>
<td>15 points maximum</td>
<td>10 points maximum</td>
<td>50 points minimum</td>
</tr>
</tbody>
</table>

48 There will be no difference in the CPE requirements for provisionally, conditionally or fully registered practitioners. The CPE requirements may be reviewed by the OOB at the end of each renewal cycle.

V. IMPLEMENTATION

Transitional Period – 1 January 2007 to 30 June 2007

49 The interim OOB is proposed to be established on 1 Jan 2007 and the Optometrists and Opticians Register is proposed to come into effect on 1 July 2007. The CLP Register will be also be repealed on 1 July 2007.

50 Between 2 Jan 2007 and 31 May 2007, existing CLPs will have to apply to the appropriate register based on their qualifications if they do not wish to have their practice interrupted. Licensing fees paid to the CLP Board will be refunded on a pro-rated basis from 1 July 2007. The Opticians register will also be open to applications by opticians who are not CLPs on 2 Jan 2007.
51 Registration for this interim period is based on the following:

<table>
<thead>
<tr>
<th>Pre-requisite</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diploma or degree in optometry recognized by the OOB and more than 1 year of practice experience.</td>
<td>Full Registration in Register of Optometrists</td>
</tr>
<tr>
<td>Diploma or degree in optometry recognized by the OOB and less than 1 year of practice experience.</td>
<td>Provisional Registration in Register of Optometrists</td>
</tr>
<tr>
<td>Certificate in Contact Lens Practice from Singapore Polytechnic or equivalent</td>
<td>Full Registration in Register of Optometrists if pass competency test; or Full Registration in Register of Opticians. Also accorded contact lens practice privileges (see Paragraph 52)</td>
</tr>
<tr>
<td>At least 2 years of experience in refraction and general opticianry immediately prior to 1 Jan 2007</td>
<td>Conditional Registration in Register of Opticians (see Paragraph 53-56)</td>
</tr>
</tbody>
</table>

**Holders of Certificate in Contact Lens Practice**

52 In developing this framework, MOH has to balance the need to maintain high standards in the opticianry and optometry profession without placing too heavy a burden on existing practitioners or endangering their livelihood. Current Contact Lens Practitioners with a Certificate in Contact Lens Practice or equivalent will be offered the opportunity to sit for a competence test.

a. Those who pass the competency test within 2 attempts will be eligible to apply for Full Registration in the Register of Optometrists.

b. Those who fail or do not wish to take the competency test will be eligible for Full Registration in the Register of Opticians. Besides being able to practice as opticians, they will be registered in the Contact Lens Sub-register and allowed contact lens practicing privileges. If they still wish to be registered as optometrists, there is currently a 2-year part-time diploma conversion course offered to them at Singapore Polytechnic. If they complete this course, they can then apply for registration in the register of
optometrists. MOH recognizes that there might be certain barriers to attaining the diploma. We therefore propose to define successful completion as having at least 80% attendance. At the end of the course, attendees can choose whether to sit for the examination or not. If they pass the examination, they will be awarded the diploma. If they fail or choose not to sit for the examination, they will be awarded a certificate of attendance. Either way, they will be eligible to apply for conversion to full registration. Attendance in this course will count towards the CPE requirements.

Opticians

53 For opticians, the following proof of experience are acceptable:
   a. If the applicant submit proof that s/he is the proprietor of an optical shop engaged in refraction and dispensing of spectacles for the last 2 years immediately prior to 1 Jan 2007
   b. If the applicant’s employer certifies that s/he has been actively engaged in refraction and dispensing spectacles for the last 2 years immediately prior to 1 Jan 2007

Fraudulent certification could result in permanent removal from the Register of Opticians.

54 All opticians who submit the above will be eligible to apply for Conditional Registration in the Register of Opticians. They will be stratified based on years of experience in refraction and dispensing as well as any prior qualifications obtained. If necessary, some applicants may be required to pass a competency test administered by the OOB in order to be registered.

55 We will work with Singapore Polytechnic to develop an upgrading programme for conditionally registered opticians. This programme will be modular and entail a total of 150 hours of training in refraction and general opticianry. Again, attendance in prior opticianry courses and years of experience in refraction and spectacle dispensing will be considered in determining partial or full exemption from this programme. Depending on
demand, this course could be conducted in Mandarin. Conditionally registered opticians have a maximum of 6 years to complete these modules at their own pace. Attendance and participation in this course will count towards fulfillment of the CPE requirements for opticians for these 6 years. Nevertheless, opticians are also encouraged to attend other CPE activities as well.

56 Once these requirements are fulfilled, they will be able to convert their registration status from conditional to full. Opticians are encouraged to complete these modules within a shorter time so that they would be able to convert their registration status earlier. Those who are unable to complete these modules by 30 June 2013 will not be able to renew their registration.

**New Regulatory Framework – from 1 July 2007**

57 From 1 July 2007, the proposed framework listed in Section IV will come into effect. Only those who have been registered in the Register of Optometrists can practice optometry. The name “Optometrists” will be protected and available for use only to those registered as such. Similarly, only those who have been registered in the Register of Opticians can practice opticianry. The name “Optician” will be protected and available for use only to those registered as such.
VI. FEEDBACK

58 MOH welcomes and values your feedback. Please submit your feedback by 24 October 2005 in the following ways:

a. Access the feedback form on-line at www.moh.gov.sg; or

b. Send an e-mail to MOH_INFO@moh.gov.sg with the following
   i. Reference – Feedback on Optometrists and Opticians
   ii. Information requested in the feedback form preferably in the same format; or

c. Detach or print the feedback form and mail/fax it to:
   Director
   Professional Standards and Development Division
   Ministry of Health
   16 College Road
   Singapore 169854
   Fax: 63259211

Please provide your personal particulars so that we can contact you for further clarifications if necessary. We will not release your personal particulars without your prior consent. The results of this public consultation will be published in an aggregate manner.
FEEDBACK FORM

Personal Particulars
Title: ______
Name: __________________________________________
Address: ________________________________________
________________________________________
Phone: _____________________
E-mail: _____________________

Feedback
1. Please indicate if you are any one of the following
   a. Registered Contact Lens Practitioner with a Diploma or above in Optometry
   b. Registered Contact Lens Practitioner with a Certificate in Contact Lens Practice (CCLP)
   c. Proprietor of an optical shop and involved in refraction and dispensing of spectacles
   d. Employee of an optical shop and involved in refraction and dispensing of spectacles
   e. Ophthalmologist
   f. Other medical practitioner
   g. Other healthcare professional
   h. Member of the public

2. Do you think that optometry and opticianry practices should be regulated?
   a. Yes
   b. No

3. If your answer to Q2 is no, please give your reasons:
   __________________________________________________________
   __________________________________________________________

4. Do you agree with the proposed regulatory framework
   a. Fully
   b. Mostly
   c. Somewhat
   d. No

5. If your answer to Q4 is b,c or d, which parts of the regulatory framework do you not agree with
   a. Registration criteria
   b. Continuing Professional Education
   c. Practice Issues
   d. Others (Specify: ____________)

6. Any Other Comments?