



March 1, 2021

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Health Professions Regulation  
Alberta Health Services

By email: [shalini.puri@gov.ab.ca](mailto:shalini.puri@gov.ab.ca)

Dear Ms. Puri,

**Re: Consultation on *Optometrists Profession Regulation***

On behalf of the Canadian Life and Health insurance Association (CLHIA), we are pleased to have the opportunity to provide our comments on the recent consultation on the topic of expanding the scope of optometrists in Alberta.

The CLHIA is a voluntary trade association with member companies that account for 99 per cent of Canada's life and health insurance business. In Alberta, the life and health insurance industry provides some 3.1 million Albertans with supplementary health benefit coverage, which includes vision care and the services of optometrists. In 2019, the industry reimbursed roughly \$5 billion for supplementary health goods and services in Alberta.

The proposal from the College of Optometrists of Alberta suggests that several procedures currently only undertaken by ophthalmologists could actually be done by optometrists in their private clinics. These procedures include injections and limited surgical and therapeutic laser procedures on the human eye and adnexa. To perform these procedures optometrists will be required to complete an Advanced Procedures certificate however the procedures will be included in the optometry degree program in future.

We agree there are many benefits to expanding the scope of practice. These include quicker patient access and problem resolution, less time spent waiting for an appointment and time off work. The proposal also suggests savings to Alberta Health Services (AHS) both through reduced funding to ophthalmologists for these procedures as well as reduced pressure on AHS resources as procedures move out of AHS funded facilities.

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While this may be true, it is our understanding the optometrists will not be funded by AHS to deliver these procedures, effectively moving funding from the public sector to cash-paying Albertans or those with private coverage through employer plans. As information, typically the majority of private coverage through employer plans will likely not cover these types of services so that the individual Albertan will likely be required to pay cash. Any change to coverage would be subject to employers working with their insurer to determine if coverage can be contemplated

It is important to consider the impact that the expansion of the scope of optometrists will have on the funding question as optometrists are not funded through the public plan.

If AHS moves forward with these changes, we would welcome the opportunity to remain in consultation with Alberta Health. If the decision is made to implement, advance notice would be appreciated to allow insurers to raise awareness and work with employers so they can consider any impact on their benefits plan.

Thank you for the opportunity to provide comments. We would be pleased to discuss any of the issues raised in this submission in more detail at your convenience. I may be reached at [jweir@clhia.ca](mailto:jweir@clhia.ca) or 416-294-9384.

Sincerely,

*Original signed by Joan Weir*

Joan Weir  
Director, Health and Disability Policy