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To: Board Members

Date: November 3, 2017

From: Jessica Sieferman
Executive Officer

Telephone: (916) 575-7184

Subject: Agenda Item 8 – Executive Officer’s Report

A. DCA Internal Audit Update

The Department of Consumer Affairs (DCA) completed its Internal Board Operational Audit. The audit was performed at the request of the DCA audit committee to provide an assessment of Board operations and internal controls. The audit test period was July 1, 2013 through June 30, 2015.

Overall, the Board did well. All but one of the recommendations have been completed – many completed in the Fall of 2015 with the new leadership. Staff is working on desk procedure manuals for licensing and enforcement using the Organizational Change Management Maps created for BreZE. The completion target is January 2018.

DCA’s Internal Audit Team will conduct follow-up reviews in February 2018 and August 2018.

The full audit is attached for your review (Attachment 1).

B. FBI’s National Identity Services Audit

The Federal Bureau of Investigation’s Criminal Justice Information Services (CJIS) Division conducted a National Identity Services Audit of the Board in September 2017. The audit included an evaluation of compliance with applicable policy requirements associated with access to and use of CJIS systems and data.

Official audit findings could take up to a year to receive. However, the auditor provided “unofficial” verbal findings to assist the Board with compliance. While these findings are subject to change, it seems unlikely, and they are items Board staff believe can be addressed now.

Confidential Destruct Oversight

One minor finding was the need to have an approved staff member physically observe the onsite confidential destruct process. This is now implemented.

Updating Personal Information Disclaimer

Another finding was the need to update the Board’s current [live scan](#) form to include instructions on how to appeal FBI fingerprint results. The Board must provide written notification to the individuals fingerprinted that the fingerprints will be used to check the criminal history records of the FB and provide the opportunity to complete, or challenge the accuracy of, the information contained in the FBI identification record. The Board also must advise the applicants that procedures for obtaining a

change, correction, or updating of an FBI identification record are set forth in Title 28, C.F.R., § 16.34.

As such, Board staff will work with legal to update the live scan form to incorporate the FBI-approved language.

Potential for Unintended Results

Currently, DCA Boards (including Optometry) have live scan forms and instructions on their websites for easy access. These forms are pre-filled out with each program's information to ensure those results go to the correct program. However, it is possible for an applicant to obtain the incorrect live scan form, which would result in a program erroneously receiving criminal history information. For example, if a security guard applicant performs an internet search for "California live scan form," multiple forms are available. Since the forms all look the same (except for the pre-filled information), it is possible the security guard applicant would download the Board's live scan form and the Board would receive those results.

In addition, students are often fingerprinted during their fourth year of school prior to applying with the Board. However, these students may never have the desire to obtain a California license. This means the Board could receive criminal history results without an application. The Board only has authority to require *applicants* and licensees to submit fingerprints, pursuant to BPC § 144; thus, the Board has no authority to maintain criminal history reports without an application.

Board staff will work with the Department of Justice (DOJ) and the FBI to develop the best solution moving forward.

C. FBI Rap Back Program

Currently, the Board receives criminal history information from the DOJ and the FBI during the initial application process. After that, the Board receives subsequent arrest and conviction notifications from DOJ only. If subsequent arrests/convictions happen in another state, the Board does not receive that information from the FBI. In addition, the Board oftentimes may not receive that information from the regulatory boards, as many do not require fingerprint results; those that do are only set up as a point-in-time check rather than a continuous reporting system. Thus, it is possible for licensees to be criminally convicted and the boards would only know if licensees self-disclosed the conviction on renewal applications.

As mentioned at previous meetings, the FBI recently developed continuous reporting capabilities like the DOJ through their "Rap Back" Program. Initially, there were fees for enrolling in the program, but those fees have been removed; the only fee is for the initial check (like DOJ).

According to the FBI, enrolling into the program requires increased legislative authority and a request from the DOJ. The DOJ's system must meet minimum security and technical standards. However, it appears DOJ's system may not currently support those standards. While DOJ representatives are aware of the program and agree in the importance, they are still in the early stage of review and need to assess resources to determine where this project fits into the division's priorities.

Staff will continue to closely monitor this significant consumer protection issue and provide updates as available.

D. Strategic Plan Update

The Board adopted its 2017-2020 [Strategic Plan](#) during the August 2017 Board meeting. The Strategic Plan includes 43 objectives to be completed before the end of 2020.

On September 20, staff met with DCA's SOLID Training Solutions (facilitators of the Strategic Plan) to develop an action plan implementing each objective, including specific tasks and anticipated end dates. Board committee reviewed and provided input on action plans related to their respective goals (e.g., Laws and Regulations Committee reviewed the Law and Regulation section) during

their quarterly committee meetings on September 28, 2017. The entire action plan is attached for review (Attachment 2). However, it appears the seven objectives added during the August meeting were not included in SOLID's planning session. Staff is developing action plans for these objectives and will provide them when available.

Progress updates will be provided during quarterly committee and Board meetings.

E. Enforcement Program

Prepared by Cheree Kimball, Enforcement Lead

Pending Caseload

As indicated in the table below, the Board closed the first quarter of FY 17/18 with 224 pending cases (155 Optometry, 69 RDO). Seventy-five cases (58 Optometry, 17 RDO) were pending for more than one year. The six high priority cases, which were expedited, include four alleging unprofessional conduct and negligence (three were settlements), one alleging Medi-Cal fraud, and one alleging sexual misconduct.

Educational, Enforcement and Disciplinary Actions

Out of the 102 cases closed during the first quarter, 31 cases (19 Optometry, 12 RDO) involving unprofessional conduct, unlicensed/unregistered practice and conviction investigations were sent education letters; twenty citations (3 Optometry, 17 RDO) were issued for convictions, unlicensed/unregistered practice, and/or advertising violations - 18 of which have been appealed and are set for Informal Citation Conference. The remaining cases were closed as non-jurisdictional, insufficient evidence, or no violation.

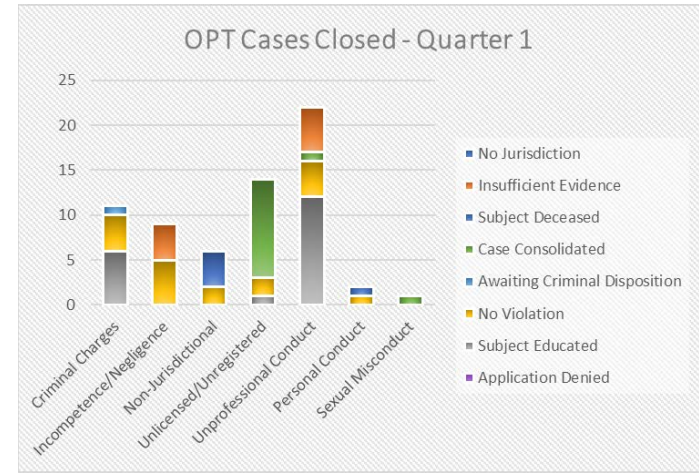
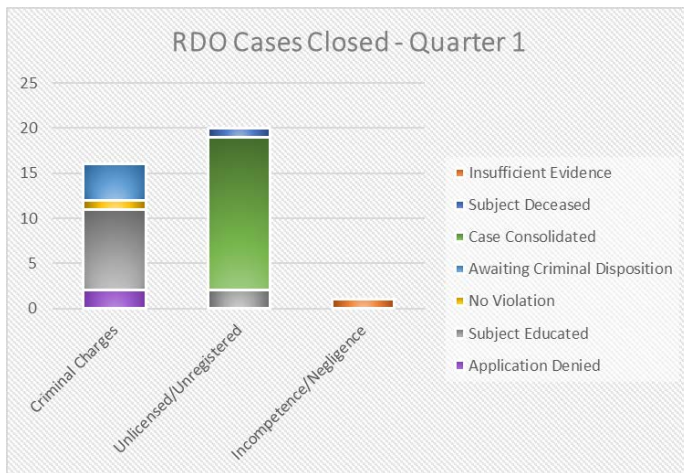
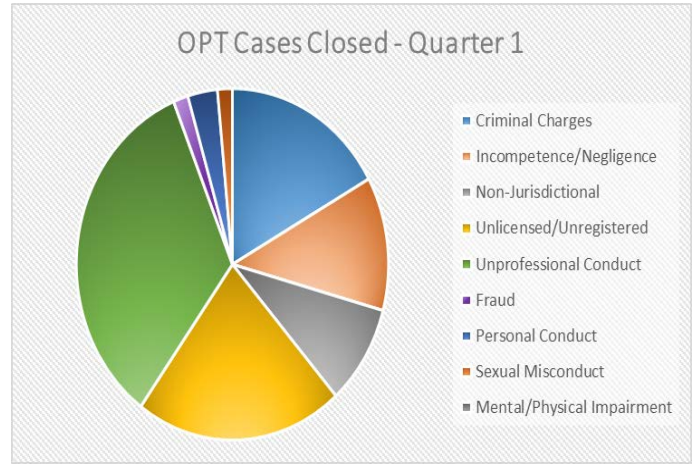
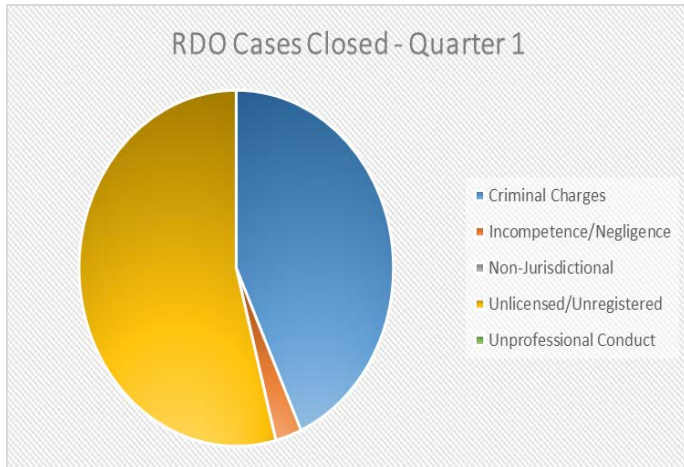
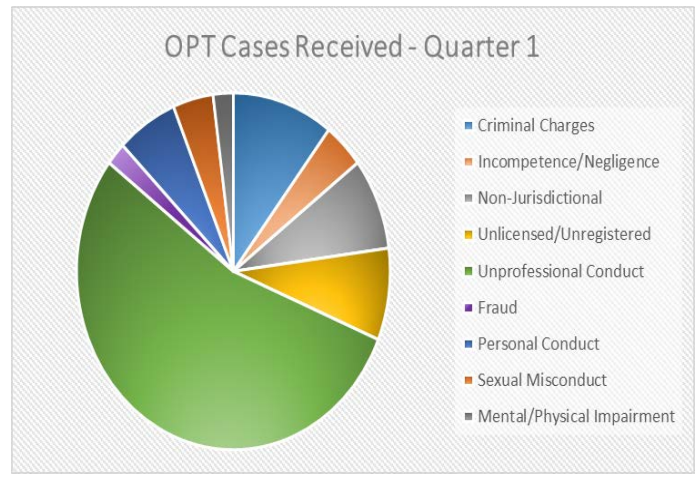
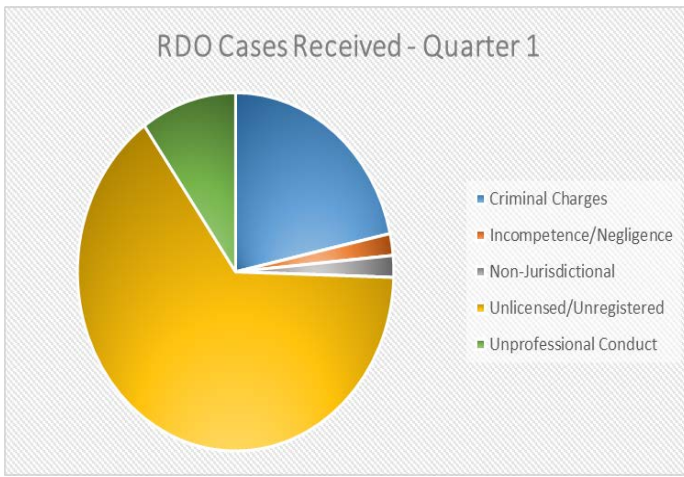
In addition, three cases were referred to the Attorney General's (AG) Office, bringing the total pending AG cases to 22.

Electronic Ballot Decisions

Between July 1, 2017 and October 19, 2017, the Board voted electronically to adopt two default decisions (Swinney; Anderson) and three stipulated surrender settlements (Kellerman; Anderson)¹ for the RDO Program. All six disciplinary cases were based on allegations involving criminal convictions.

	Q1 – FY17/18						FY Total	
	Routine		Expedite		High		OPT	RDO
Cases by Priority	OPT	RDO	OPT	RDO	OPT	RDO		
Received	42	50	0	0	6	1	48	51
Closed	63	37	0	0	2	0	65	37
Average Age (days) - Closed	249	82	0	0	22	0	242	82
Pending	149	69	0	0	6	0	155	69
Average Age (days) – Pending	346	278	0	0	81	0	346	278
Referred to AG	1	1	0	0	0	1	1	2
Pending at AG	8	13	0	0	0	1	8	14
Final Disciplinary Orders	3	1	0	0	0	0	3	1

¹ One Respondent name is not publicly disclosable at this time.



Enforcement Process Overview

Intake

The Board initiates investigations based on information from a variety of sources, such as consumers, DOJ/FBI, insurance companies, the National Practitioner Databank (NPDB), and other industry stakeholders.

The Board receives an average of 380 cases every year. The most common allegations investigated involve unlicensed or unregistered practice, criminal convictions, advertising violations, personality conflicts, pricing, and misdiagnosis and/or failure to refer. Unlicensed/unregistered practice allegations include subjects operating completely without licensure (optometrist or optician), such as unlicensed cosmetic contact lens sales, or licensees who failed to obtain a Fictitious Name Permit, Branch Office License, Statement of Licensure.

Criminal convictions cases are most often received from the DOJ when an applicant submits to fingerprinting as part of their application requirements. As indicated above, the Board also receives notification from the DOJ if a licensee has been arrested or convicted subsequent to the initial background check. Additionally, licensees and registrants are required to self-report any convictions on their renewal application.

Once received, the Board determines jurisdiction. Cases with no jurisdiction (e.g., complaints against ophthalmologists, optometrists in another state, labor code violations, etc.) are closed with a referral to the appropriate agency.

Investigation

If the matter is within the Board's jurisdiction, the investigation is assigned to an analyst for review and investigation. During the investigation process, the analyst may contact the complainant, the subject, and/or other involved parties to obtain factual evidence. Investigations requiring undercover operations, interviews, or subpoenaed documents are sent to the Department's Division of Investigation (DOI) and assigned to a sworn field investigator.

Expert Review

After gathering evidence, cases involving standard of care concerns are transferred to subject matter experts for review and drafting of professional standard of care opinions.

Closing with No Administrative/Disciplinary Action

After the evidence, investigative and/or expert reports are gathered, the analysts review the totality of the case and recommends appropriate action. If there is no violation found or there is insufficient evidence establishing the violation, the analyst recommends closing the case. The Board's burden of proof is "clear and convincing evidence" ([Ettinger v. Board of Medical Quality Assurance \(1982\)](#) 135 Cal.App.3d 853, 855-856.), so cases where the investigation fails to meet this burden cannot move forward to disciplinary action.

When evidence substantiates a violation, the Board seeks to resolve the case at the lowest appropriate level. Certain types of less egregious violations, particularly if it's the subject's first offense, may not warrant administrative or disciplinary action. For example, if an optometrist is using a fictitious name without a fictitious name permit (FNP), the optometrist is given the opportunity to obtain the FNP and update their advertising (if applicable). If compliance is obtained, the investigation may be closed with an educational letter to the subject reminding them of the law.

Proceeding with Administrative/Disciplinary Action

Cases involving substantiated, more egregious violations will move forward for administrative (citation) or disciplinary action (Statement of Issues/Accusation). When determining appropriate action, enforcement staff and the EO reviews multiple factors set forth in CCR §§ [1516](#), [1399.271](#), and [1399.272](#), which include the following:

- the nature and severity of the act or crime,
- whether it was one incident or multiple incidents of the same or similar violations,
- how much time has elapsed since the most recent incident,
- what the subject has done in the way of rehabilitation, and
- whether the subject has come into compliance with the law.

In addition, CCR § [1517](#) or [1399.270](#) are used to determine if a conviction is substantially related to the duties and functions of the profession. While DUI convictions for weekend, evening, or holiday occurrences may not be considered related to their ability to practice on the surface, significant case law demonstrates how these convictions are substantially related to a licensee's ability to practice and violates public trust.²

² [Grannis v. Board of Medical Quality Assurance \(1971\)](#) 19 Cal.App.3d 551 [physician disciplined on the basis of two DUI convictions]; *In re Car* (1988) 46 Ca1.3d 1089 [State Bar suspended an attorney for two DUI convictions]; *In Re Kelley* (1990) 52 Ca1.3d 487 [attorney disciplined for two DUI convictions]; [Griffiths v. Superior court \(2002\)](#) 96 Cal.AppAth 757 [physician's license suspended for three DUI convictions].

Citations are determined based on CCR §§ [1578](#) and [1399.275](#).

Once cases are transmitted to the AG's Office, the EO works with the assigned Deputy Attorney General (DAG) to prepare and file an Accusation. If the respondent files a timely Notice of Defense (NOD), a hearing is set at the Office of Administrative Hearings (OAH) before an Administrative Law Judge (ALJ).

Whenever possible, the EO seeks a Stipulated Settlement with the respondent, resulting in quicker, cost effective consumer protection. If an agreement cannot be reached or a hearing is more appropriate, that the case is reviewed by an ALJ. The Executive Officer, DAG, and ALJ use the Board's [Disciplinary Guidelines](#) to determine the appropriate discipline level.

Once a decision is drafted for approval, whether a stipulated settlement, an ALJ proposed decision, or a default decision (where the subject fails to file a NOD after the service of the Accusation), it comes before the Board for consideration. Pursuant to [BPC §3024](#), the Board has the authority to deny a license or registration and to revoke or suspend a registration or license. When reviewing a decision, the Board can adopt or non-adopt the decision based on factors listed in the [Board Member Handbook \(2016\)](#) (page 31).

After adoption, the Decision becomes effective 30 days after the order date, unless the subject seeks other legal relief, such as filing a Petition for Reconsideration or a Petition for Writ of Mandate in Superior Court.

F. Examination and Licensing Programs

Examination Program

Even after offering continuing education credits for participating in examination workshops, the Board still struggles is obtaining adequate subject matter experts (SME). This has forced the Board to reschedule several workshops and delay the occupational analysis schedule.

After meeting with the Office of Professional Examination Services (OPES) regarding this issue, it appears a driving factor is the low re-imbursement rate (\$100 per diem and travel expenses). OPES recommended increasing rates, stating this has significantly helped other programs in the past. According to OPES, some of the other boards whose SMEs work at a similar occupational level as optometrists (e.g. psychologists) get between \$200 and \$300 depending on the type of workshop. Another bureau recently increased their per diem due to recruitment issues which seems to have helped.

Board staff will work with the DCA Budget Office to determine what increase, if any, the budget can support in order to help address this issue. In addition, OPES provided Board staff with additional "Best Practices" for year-round recruitment efforts.

The revised Examination Development and Occupational Analysis schedules are as follows:

Examination Development Workshops

Item writing – January 22, 2018
Item writing – April 23, 2018
Item review – June 18, 2018
Passing score – July 30, 2018

Occupational Analysis Workshops

OA #1 – March 26-27, 2018
OA #2 – July 9-10, 2018
Launch Pilot Survey – July 30 – August 17, 2018
Launch Final Survey – August 27 – September 21, 2018
OA #3 – October 15-16, 2018

Licensing Program

As indicated in attached statistics (Attachment 3), BreEZe utilization continues to exceed paper applications for the majority of optometry license types. Since the RDO Program launched BreEZe's online capabilities in June 2017, the Board has received a steady increase in online applications; in September, online applications exceeded paper applications in each registration type.

DCA recently developed new licensing reporting tools for management to easily monitor pending applications (Sampled below). Management and staff can quickly identify any "unassigned" applications, monitor application processes and address any "bottlenecks" they may occur. In addition, using the tools identifying pending renewal applications, staff can send mass emails to licensees with links to BreEZe encouraging them to renew online.

Management worked with the BreEZe team to add the capability for licensees to change their address of record online. Currently, licensees must submit a written request (email, fax, or regular mail) in order to update their address. However, once the transaction is available online, licensees will be able to update their address without any staff interaction. This enhancement is set to "go-live" in March 2018. The RDO Program registrants are already benefitting from this enhancement.

Over the next several weeks, management will analyze additional BreEZe enhancements to automate certain licensing processes. The Statement of Licensure (SOL), for example, currently requires staff interaction to process the application. However, with some minor enhancements, it may be possible to have the SOLs process automatically – reducing cycle times and resources while increasing the number of SOLs processed each month. Updates will be provided to the members as they are available.

G. Personnel

As previously reported, the Board's receptionist is enjoying a year of maternity leave and is expected to return in May 2018. To assist with coverage while she is gone, DCA has graciously loaned us Abby LeCureux from their call center on a month-to-month basis. Ms. LeCureux has proven to be a significant asset to our team.

On August 28, the RDO Program Coordinator took a Leave of Absence for a year to pursue a bachelor's degree in business management. In response, a limited term position was created to process RDO Program applications; management anticipates filling the limited term position by early November. While a processing delay is expected, Kellie Flores is assisting in processing RDO applications to help alleviate the anticipated backlog.

Arsha Qasmi joined the Board's Licensing Team on September 27, 2017 to serve as the Board's Licensing Lead. Carol Wilson is training Ms. Qasmi on the optometrist application process. Due to Ms. Wilson's tireless work, Ms. Qasmi started her position with no licensing backlog.

Part of the Board's Strategic Plan Organizational Effectiveness Goal includes teambuilding events and exercises between Board members and staff to improve relationships (Objective 6.4). As such, staff is working with SOLID to develop exercises during the January 2018 meeting.

H. Budget

In July 2017, the Department transitioned from CalStars to the new statewide Accounting and Budgeting system known as Fi\$Cal. The Department went "live" officially on July 10th and since then has made great strides in understanding and transacting within the system. Any type of significant change or transition to a system such as Fi\$Cal inherently brings with it challenges and hurdles to overcome.

One of the main challenges the DCA Budget Office has encountered has been the closing of Fiscal Month (FM) 01 transactions. While it was anticipated that the departments that went live in July would be able to close FM01 by mid-September and FM02 following shortly after, that is not the case. It is now anticipated that FM01 will be closed by November barring any other challenges or

problems that arise. As a result, expenditure and revenue reports have proved difficult to extract from the system and has caused a delay in providing this information.

DCA's Budget Office is working on standardizing and formatting reports that are available in the system into a streamlined and transparent format that will be easily digested and provide clients with the necessary data for tracking and projections. Another side effect of the challenges they have faced while transacting in the system is the timing of expenditure postings and backlogs that are being worked through. Due to this timing issue, you can expect to see minimal Operating Expenses being recorded in FM01 as a majority of the transactions that were able to post in the system were labor costs. FM02 will see a spike and higher than normal expenditures being posted as the transactions are caught up from FM01. Beginning with FM03, we expect the transactions to post in a more normal fashion as the backlogs are addressed.

The DCA Budget Office apologizes for the inconvenience and delay in providing these valuable reports. DCA appreciates your patience and understanding during this on-going transition to Fi\$Cal.

Attachments:

1. Internal DCA Audit Report
2. 2017-2020 Strategic Plan – Action Plan
3. Licensing Statistics



California Board of Optometry Operational Audit

*DCA Internal Audit Office
Report 2016-109
August 2017*

August 28, 2017

Jessica Sieferman, Executive Officer
California Board of Optometry
2450 Del Paso Road, Ste. 105
Sacramento, CA 95834

Subject: Final Audit Report of the Operational Audit – California Board of Optometry

Dear Ms. Sieferman:

Enclosed please find our audit report for the California Board of Optometry (CBO). The audit was performed at the request of the DCA audit committee to provide an assessment of the board's operations and internal controls. The audit test period was July 1, 2013, through June 30, 2015. The last day of field work was May 23, 2017.

The CBO responded to the draft report on August 24, 2017. Their responses have been incorporated into this final report. Additionally, we have provided our comments related to the responses for findings #1 and #6.

We will return to CBO for follow-up reviews after 180-days and 360-days from the date of the final report to evaluate your progress in implementing the audit recommendations.

We appreciate the cooperation extended by CBO's staff during the course of the audit. If you have any questions, please contact me at (916) 574-8192.

Sincerely,

Original signed by:

Annecia Wallace
DCA Internal Audit Chief

cc: Dean R. Grafilo, Director
Jeffrey Mason, Chief Deputy Director

Enclosure: Draft Audit Report of the Operational Audit – California Board of Optometry

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Report Summary

The Department of Consumer Affairs' (department) Internal Audit Office completed an operational audit of the California Board of Optometry (CBO).

To evaluate the board's operations we interviewed pertinent personnel and reviewed relevant documentation and processes. We performed compliance testing of key functions and compared actual operations to applicable laws, regulations, and guidelines. Our audit test period was from July 1, 2013, through June 30, 2015. Note that the Registered Dispensing Optician (RDO) program was transferred to the CBO on January 1, 2016. We were able to review files of the RDO program applicable to our audit period, even though these had been processed at the Medical Board. Our last day of audit fieldwork was May 23, 2017.

Our audit revealed the board has a small number of operational deficiencies in its business operations. The following audit issues are addressed in greater detail under the Findings and Recommendations section of this report:

1. CBO is out of compliance with California Code of Regulations Section 1564(a) which requires the Board to inform in writing an applicant for licensure as an optometrist within 45 days of receipt of the application whether the application is complete and accepted for filing or is deficient and what specific information is required. Five out of twenty seven cases tested did not have evidence of this requirement in the licensing file.

Recommendation: CBO licensing should provide applicants with written notification of application deficiencies within 45 days of initial application.

2. CBO employee official personnel files located at DCA were lacking essential documentation such as duty statements, probation reports and Individual Development Plans (IDPs).

Recommendation: CBO should ensure the completeness of employee official personnel files by filing official duty statements, IDPs, and probation reports timely.

3. Department of Justice RAP sheets are not shredded or sent to confidential destruct once a license is issued or a file is closed. RAP sheets were found in 20% (3 of 15) of the files reviewed.

Recommendation: Criminal Offender Record Information RAP sheets should be shredded or sent to confidential destruct once a license is issued or an enforcement file is closed.

4. There are no written desk manuals for two critical functions of the CBO, licensing and enforcement. New employees must learn "on the job" versus

from a written instruction manual, relying on the passing down of critical licensing and enforcement procedures from one employee to the next.

Recommendation: To ensure the critical processes of licensing and enforcement are performed as uniformly as possible, written desk procedure manuals should be made available to all licensing and enforcement employees.

5. The combination to the safe has never been changed, even though staff who knew the combination has left the board. Additionally, no log is maintained listing when the combination was last changed and who currently has access.

Recommendation: To provide good internal control the combination to the safe should be changed whenever an excessive number of staff have access to the combination or when an employee knowing the combination leaves the board. In addition, a log should be maintained that lists who has access and when the combination was last changed.

6. CBO employees have not taken all state required training courses. Some employees are missing classes in sexual harassment, basic supervision, Information Security and Privacy, Ethics Orientation, and Defensive Driver training.

Recommendation: CBO management should determine which employees are deficient in which courses and require that the courses be completed.

7. Applications for statements of licensure were not supported in the hard copy files. Twelve out of twenty-eight licensing files did not contain an SOL application applicable to the audit period.

Recommendation: CBO should review the accuracy of the SOL files to ensure all SOLs are documented with the correct address and corresponding license. The original application for an SOL should be maintained in the hard copy files.

Background

The California Board of Optometry (CBO) was established by the state of California in 1913 to regulate the practice of Optometry. In 2016 a major change took place when the Governor transferred the Registered Dispensing Opticians program to the Board of Optometry from its former place at the state Medical Board. The CBO is part of the Department of Consumer Affairs (DCA). The CBO has an 11 member board, appointed by the Governor, which oversees its administrative operations. The Board appoints the Executive Officer, who oversees approximately 10 employees. The CBO accomplishes its mission through licensing and enforcement of approximately 12,000 licensees and registrants in 8 different license/registration classifications.

Our audit included the areas of licensing, enforcement, strategic planning, and administrative internal controls over the cash receipts and personnel functions. The audit identified areas where controls were in place and working as intended. However, we also found areas where internal controls and compliance with the Business & Professions Code could be improved. If left uncorrected, these conditions increase the risk of inadequate internal controls, misappropriation, errors or irregularities occurring. These conditions are described in the Findings and Recommendations section of this report.

Objectives, Scope and Methodology

The objectives and scope of this audit were to determine:

- Whether established policies and procedures exist to guide staff in effectively handling operational activities;
- Whether the CBO has complied with applicable laws and regulations.

The following procedures were performed to address the audit objectives:

- An anonymous employee survey was utilized to determine what areas of concern could be identified by CBO personnel; summarized and incorporated the results into our audit program;
- Interviewed key personnel, including CBO staff to obtain their perspectives;
- Reviewed available written policies and procedures governing CBO's operations;
- Evaluated the CBO's strategic planning process;
- Evaluated the CBO's compliance with DCA mandatory employee training policy;
- Reviewed cash handling at the CBO front counter;
- Reviewed public disclosure of disciplinary action on the CBO license look-up web page;
- Tested the internal controls and compliance with the Business & Professions Code governing the licensing and registration processes at CBO;
- Tested the internal controls and compliance with Disciplinary guidelines governing the Enforcement and disciplinary processes.

The results of our review are presented in the Findings and Recommendations section of this report.

Findings and Recommendations

1. Written Notice of Licensing Deficiencies

The CBO does not always provide required written notice of deficiencies in licensing applications within 45 days of initial application for a license.

California Code of Regulations (CCR) Section 1564(a) states, "The board shall inform in writing an applicant for licensure as an optometrist within 45 days of receipt of the application whether the application is complete and accepted for filing or is deficient and what specific information is required."

Twenty-seven optometrist initial applications were tested. Of these, five did not contain evidence of written notice of deficiency in the file.

Recommendation:

CBO licensing personnel should put all communications with applicants in writing, whether by formal letter or e-mail, to provide a documented trail of adherence to section 1564(a) of the CCR.

CBO RESPONSE:

Board staff believes there is insufficient evidence to determine compliance with this condition. During the 2013-15 audit period, it was (and still is) standard procedure to send deficiency letters immediately after receiving the application, as all applications are deficient. However, some deficiency letters were sent via email and not printed and placed into the paper file. The employee responsible for sending deficiency letters during this time is no longer with the Board, so the Board does not have access to the email account to verify.

Since the implementation of BreEZe, standard practice is to attach all deficiency letters to the license file. Thus, the recommendation is complete.

Auditor's Response:

This appears to be a BreEZE system related improvement that will provide an improved audit trail for these letters now and going forward. We will review this area at the 180-day follow-up.

2. Personnel Files Lacked Required information

Nine employee personnel files were selected for testing at DCA Human Resources. We found that two (22%) did not contain duty statements, two (22%) did not contain probation reports, and 1 (11%) did not contain an individual development plan (IDP) within the last twelve months.

Department of Consumer Affairs, Personnel Procedures Handbook, Individual Development Plans, Chapter 650, Section 650-1 states, “The Government Code (GC) Sections 19992 – 19992.4 and the Department of Personnel Administration (DPA) Rule 599.798 require supervisors to complete written evaluations and discuss overall work performance with permanent employees. This evaluation should occur at least once every 12 months after the completion of the employee’s probationary period.”

Probationary Period Policy, Personnel Procedures Handbook, Section 600-1 through 600-13, states a new probationary period is required when an employee enters or is promoted in the state civil service on a permanent basis.

Recommendations:

The board should file probationary reports as required by the DCA Human Resources Office and require yearly individual development plans be submitted by all employees. In addition, duty statements should be maintained in files for all employees.

CBO RESPONSE

During the 2013-2015 audit period, probation reports and IDPs were not completed and duty statements were not always properly maintained for all employees. Since 2015, management has been committed to employees through probation reports and individual development plans. The missing duty statements are now properly maintained in the respective OPF. One IDP is missing and will be completed in September 2017.

3. Department of Justice RAP Sheets were found in Enforcement Files

Department of Justice RAP sheets are not shredded or sent to confidential destruct once a license is issued or a file is closed. RAP sheets were found in three of eight citations files reviewed (37.5 %).

The Department of Justice, Criminal Offender Record Information Policy, states in part, “Record Destruction – it is recommended that the state summary of CORI obtained for employment, licensing or certification processes be destroyed once a decision is made to employ, license, or certify the subject of the record. Retention beyond this time should be based on legitimate business need or statute.”

Non-compliance could result in a breach of the Privacy Act and a loss of state monies for allowing privacy information to be viewed by unauthorized personnel.

Recommendation:

Criminal Offender Record Information RAP sheets should be shredded or sent to confidential destruct once a license is issued or an enforcement file is closed.

CBO RESPONSE

Board staff implemented written procedures to properly dispose of CORI RAP sheets upon enforcement case closure.

4. The CBO lacks desk procedure manuals for Licensing and Enforcement

There are no current procedure manuals for two critical functions, licensing and enforcement. New employees must learn on the job without written instructions delineating how these functions are to be performed. Without written procedure manuals, licensing and enforcement cases are subject to inconsistent treatment, and some cases may be compromised.

State Administrative Manual, Internal Control, Section 20050, states in part, "State entity heads, by reason of their appointments, are accountable for activities carried out in their agencies. This responsibility includes the establishment and maintenance of internal accounting and administrative controls. Each system an entity maintains to regulate and guide operations should be documented through flowcharts, narratives, desk procedures, and organizational charts. The ultimate responsibility for strong internal controls rests with management."

Recommendation:

To ensure proper and consistent handling of licensing and enforcement functions, desk procedures should be created and distributed to all CBO employees.

CBO RESPONSE

Utilizing the BreEZe Organizational Change Management mapping, staff is developing updated desk procedures for all licensing, enforcement, and administrative matters. The target completion is January 2018.

5. The Safe Combination has Never been Changed

The combination to the safe has never been changed even though staff having knowledge of the combination to the safe has left the board. In addition, no log is maintained listing when the combination was last changed, and which employees have access to the safe. State Administrative Manual, Section 8024, safes and vaults, states the following:

- The combination will be known to as few persons as possible consistent with operational requirements and the values of the cash or documents safeguarded.
- A record will be kept showing: (a) date the combination last was changed and (b) names of persons knowing the present combination.
- The combination will be changed when it becomes known to an excessive number of employees, or if any employee having knowledge of the combination leaves the employ of the state agency, or no longer requires the combination in the performance of his or her duties.

There could be a loss of state monies through misappropriation of cash stored in an easily accessible safe.

Recommendation:

To provide good internal control the combination to the safe should be changed whenever an excessive number of staff know the combination or when a person knowing the combination leaves the board. In addition a log should be maintained that lists who has access and when the combination was last changed.

CBO RESPONSE

The safe combination has changed and will continue to change each time a staff member with the combination leaves the Board. A log is now maintained, listing staff access and dates the combination changes.

6. CBO Employees Have Not Taken All Required Training

The state of California requires all state employees to take certain required courses. CBO employees have not taken many required courses such as sexual harassment prevention, basic supervision (supervisors only), Information Security and Privacy Protection Awareness, Ethics Orientation, and Defensive Driver Training. These requirements are found in the following policies and regulations:

- EEO-12-01 – Sexual Harassment Prevention Policy
- CGC 19995.4- Basic Supervision Training
- SAM 5300.3 – Information Security and Privacy Awareness Training
- CGC 11146 – Ethics Orientation Training
- SAM 0752 – Defensive Driver Training

CBO could be at risk due to employees not receiving state required training courses.

Recommendation:

CBO management should ensure staff adhere to all mandatory state training requirements.

CBO RESPONSE

Except for the Defensive Driver Training, all required training as been completed. The Defensive Driver Training will be completed by September 2017.

Auditor's Response:

We appreciate the efforts made since the end of our fieldwork to bring CBO staff in compliance with required training. We will review the defensive driving course certificates at the time of the 180-day follow-up.

7. CBO Statements of Licensure Not Adequately Supported

When an optometrist seeks to practice at an address that is not his or her principal place of practice, and there is no ownership interest in this business address, they are required to obtain a statement of licensure from the CBO. This statement of licensure is to be placed in all practice locations other than an optometrist's principal place of practice. We tested a sample of 28 SOLs which were in place during the audit period. Of the 28 files tested, 8 had been cancelled, and eleven others did not contain the supporting application for the SOL under audit, leaving only 9 that could be verified as valid.

Business and Professions Code Section 3070 states, "Before engaging in the practice of optometry, each licensed optometrist shall notify the board in writing of the address or addresses where he or she is to engage in the practice of optometry, and, also, of any changes in his or her place of practice. After providing the address or addresses and place of practice information to the board, a licensed optometrist shall obtain a statement of licensure from the board to be placed in all practice locations other than an optometrist's principal place of practice."

Hard copy files should contain evidence of a statement of licensure for all situations in which one is appropriate.

Recommendation:

CBO should review the accuracy of the SOL files to ensure that all reflect the correct addresses and corresponding licenses, and that all required SOLs are on file for verification purposes.

CBO RESPONSE

Of the eleven missing applications from the 2013-15 audit period, seven were located. Currently, it is standard procedure to maintain all SOL applications in BreEZe. Quality reviews will be conducted quarterly to ensure compliance with this procedure and other applicable statutes and regulations.



2017-2020 Strategic Plan

Prepared by
SOLID Planning Solutions
Department of Consumer Affairs
Adopted



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MEMBERS OF THE CALIFORNIA STATE BOARD OF OPTOMETRY

Cyd Brandvein, President

Donna Burke, Vice President

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Madhu Chawla, OD

Martha Garcia, CLD, SLD

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Alexis Podesta, Secretary, Business Consumer Services and Housing Agency

Dean Grafillo, Director, Department of Consumer Affairs

Jessica Siefertman, Executive Officer, California State Board of Optometry

MESSAGE FROM THE PRESIDENT



The California State Board of Optometry (Board) is pleased to present its 2017-2020 Strategic Plan. Development of this Strategic Plan has been a collaborative effort between Board Members, Board staff, and the public and we thank everyone for their input and support throughout the process. This plan reflects the Board's continued commitment to work closely with stakeholders to meet its mission to protect the health and safety of California consumers through licensing, education and regulation of the practice of optometry.

We begin this transformative period with a reimagined Strategic Plan, one that guides us in our analysis and response to new and emerging issues in the fields of optometry and healthcare. Our four-year pathway will address timely and diverse topics that are fundamental to consumer protection. These include organizational realignment, access to quality eye care, technology and innovation, new or emerging business models in optometric care, and professional and technical excellence.

Already in progress is an organizational realignment. We are fulfilling our Board's regulatory requirement by integrating Registered Dispensing Opticians into our Board, constituting the Dispensing Opticians Committee and establishing a new and productive partnership with opticians throughout the State.

As we look at access to quality eye care, we will sponsor legislation, understand the future role of mobile optometric facilities as well as examine alternative methodologies for delivery of optometric and dispensing services in the most underserved areas of California. We will also be evaluating, assessing and educating the public regarding new technological advancements in eye care such as online, telemedicine and concierge services in California in keeping with our mission to promote consumer protection and care. And lastly, evaluating and refreshing regulations such as licensing processes and electronic database use will help keep us current with today's optometric and opticianry practices.

While these issues are priorities for the Board, we remain focused in our commitment to strongly advocate for public protection through our actions as a unified public policy voice. On behalf of the Board, we thank you for your interest in our Strategic Plan.

Cyd Brandvein

President

California State Board of Optometry

ABOUT THE BOARD

Since its inception over 100 years ago, the California State Board of Optometry (Board) has supported and helped consumers by advocating consumer interests before lawmakers, regulating to protect consumers from unlicensed practitioners and guarding our licensees against unfair competition, enforcing laws to protect the consumer and resolving disputes between business and a customer or a consumer and a licensee.

Our authority to protect the health and safety of California patients receiving optometric care through licensing, education, and regulation of the practice of Optometry was expanded on January 1, 2016, when Governor Jerry Brown signed Assembly Bill 684, transferring the practice of optical dispensary from the Medical Board of California (MBC) to our State Board. Overnight, the Board's regulatory population grew by 50% - expanding its regulatory oversight from 8,000 licensees to roughly 12,000 licensees and registrants.

Today, the Board regulates the largest population of optometrists and dispensers in the United States with over 17,400 licenses, registrations, and permits. The Board is also responsible for issuing optometry certifications for Diagnostic Pharmaceutical Agents, Therapeutic Pharmaceutical Agents, Lacrimal Irrigation and Dilation, and Glaucoma.

With this significant change in population come new, emerging responsibilities. Our Board stands ready and has the capabilities and resources to maintain the same level of accountability, efficiency, effectiveness, integrity and customer service it has delivered since the last Sunset Review. Further, it is in the best interest of California consumers to continue protecting their eye care health and safety through the Board in its current constituted state – an independent Board that relies on the Department of Consumer Affairs (DCA) for administrative support.

As we continue our evolution – from a Board with challenges in 2002 to a well-functioning Board today – we are poised to meet the regulatory changes, adjust through internal improvements to our organizational structure and set a new path forward through a revised Strategic Plan that better aligns with our evolving consumer protection mandate. The Board currently has the following four committees, all composed of professional and public members.

Achieving our Mission and Positioned to Move Forward

The Board's mission is to protect the health and safety of California consumers through licensing, education, and regulation of the practice of Optometry. The Board accomplishes its mission through the following responsibilities:

- Promulgating regulations governing Board procedures, admission of applicants for examination for an optometric license; minimum standards of optometric and dispensing services offered and performed, the equipment and sanitary conditions in all registered locations;
- Investigating consumer complaints and criminal convictions including, but not limited to substance abuse, unprofessional conduct, incompetence, fraudulent action, and unlawful activity;
- Taking disciplinary action for violations of laws and regulations governing the practice of optometry and dispensing when warranted.
- Accrediting schools and colleges of optometry;
- Establishing educational and examination requirements to ensure the competence of candidates for licensure/registration;
- Setting and enforcing standards for continued competency of existing licensees;
- Establishing educational and examination requirements for optometrists seeking certification to use and prescribe certain pharmaceutical agents and other procedures; and
- Issuing branch offices licenses, statements of licensure and fictitious name permits.

California became the third state to regulate the optometry profession in 1903, and a new Optometry Practice Act, enacted in 1913, created the Board, defined its duties and powers, and prescribed a penalty for violations of the Act. The Act was later incorporated in the Business and Professions Code (BPC). Empowered with rulemaking authority (BPC Sections 3025 and 3025.5), the Board promulgated the first rule for the practice of optometry in 1923. In the same year, the legislature passed a law requiring all applicants for licensure to meet certain educational requirements, i.e., graduate from an accredited school or college of optometry and charged the Board with the responsibility of accrediting these schools. Prior to this time, individuals desiring to practice were not required to have any specific formal education.

On January 1, 2016, Assembly Bill 684, moved the RDO Program under the Board's jurisdiction, and created a Dispensing Optician Committee, comprised of two public members, two dispensers, and one Board Member to advise the Board on dispensing-related matters and education for registered opticians. Assembly Bill 684 replaced one of the Board's professional members with registered optician.

Board Committees

The Board has the following committees composed of professional and public members:

- Legislation and Regulation
Responsible for recommending legislative and regulatory priorities to the Board and assisting staff with drafting language for Board-sponsored legislation and recommending official positions on current legislation. The committee also recommends regulatory additions and amendments.
- Practice and Education
Advises Board staff on matters relating to optometric practice, including standards of practice and scope of practice issues. Reviews staff responses to proposed regulatory changes that may affect optometric practice. Also reviews requests for approval of continuing education courses, and offers guidance to Board staff regarding continuing education issues.
- Consumer Protection
Oversees the development and administration of legally defensible licensing examinations and consults on improvements/enhancements to licensing and enforcement policies and procedures.
- Public Relations – Outreach
Assists with the development of outreach and development of educational materials to the Board's stakeholders.
- Children's Vision Workgroup
SB 402 was created to address the gap in providing eye exams to entry elementary school students as a result of budgetary cuts in the public school system. Among other things, it mandated that children entering school receive a comprehensive eye exam in order to combat the one in three school vision screenings which miss vision problems. Due to the failure of SB 402 to pass out of the Senate Appropriations Committee, the Board created this workgroup, comprised of two members, tasked with meeting with stakeholders on this issue and providing legislation recommendations to the Board for consideration during the 2017 legislative session.
- Mobile Clinic Workgroup
Protecting and providing families' access to convenient, quality eye care, and support to optometrists so they continue providing the vision care services Californians need and deserve in many environments, the Board created the Mobile Clinic Workgroup. Prior to the workgroup, Senate Bill 349 was introduced, which focused on creating guidelines for mobile optometric facilities; however, it failed to pass out of the Senate Committee on Business and Professions in 2015. The workgroup, comprised of two members, is tasked with

meeting with stakeholders on this issue and providing legislation recommendations to the Board for consideration during the 2017 legislative session.

- Foreign Graduate Workgroup

Recognizing that there was no pathway for foreign graduates to become licensed in California after they pass all required state and national examinations, the Board sponsored Senate Bill 496 (Senator Nguyen). If passed, this would have created the pathway for foreign graduates to become licensed in California; however, it was pulled by the author in 2015 after receiving several equivalency concerns from schools/colleges of optometry and the professional association. In order to determine the best avenue to move forward, the Board created this workgroup, comprised of two members, and tasked it to meet with stakeholders, including the accredited schools and colleges of optometry, to provide stronger legislation recommendations to the Board for consideration during the next legislative session.

- Dispensing Optician Committee – Development Workgroup

The Board created a DOC Appointments Committee, comprised of two members, to vet potential candidates and make recommendations to the full Board. The DOC will begin meeting in mid-2017.

STRATEGIC GOALS

1 *LICENSING*

2 *EXAMINATION*

3 *LAW AND REGULATION*

4 *ENFORCEMENT*

5 *OUTREACH*

6 *ORGANIZATIONAL EFFECTIVENESS*

California State Board of Optometry Mission, Vision, and Values

Mission

To protect the health and safety of California consumers through licensing, registration, education, and regulation of the practice of Optometry and Opticianry.

Vision

To promote high quality optometric and optical care for the people of California.

Values

Consumer Protection – *We make effective and informed decisions in the best interest and for the safety of Californians.*

Integrity – *We are committed to honesty, ethical conduct, and responsibility.*

Transparency – *We hold ourselves accountable to the people of California. We operate openly so that stakeholders can trust that we are fair and honest.*

Professionalism – *We ensure qualified, proficient, and skilled staff provides excellent service to the State of California.*

Excellence – *We have a passion for quality and strive for continuous improvement of our programs, services, and processes through employee empowerment and professional development.*

GOAL 1: LICENSING

The Board provides applicants and licensees a method for obtaining and maintaining license registration, business licenses, and certifications required to practice optometry in California.

- 1.1 Streamline the initial license and renewal process, including paperless options and synchronizing multiple license renewal dates, to improve staff efficiency and licensee compliance.

Start Date: Q1 17/18		End Date: Q3 17/18
Success Measure: Cycle timelines decreased and streamlined processes implemented.		
Major Tasks	Responsible Party	Completion Date
Utilize process maps to develop timelines associated with each step.	Licensing Lead Analyst	January 2018
Schedule monthly meetings to discuss the timelines and identify the bottlenecks to better streamline the processes.	Licensing Lead Analyst	September 2017
Identify and raise all necessary BreEZe SIRs including independent transaction not requiring staff interaction and board approval.	Licensing Lead Analyst	January 2018
Conduct outreach with licensees to inform them of the paperless direction of the Board.	Licensing Lead Analyst	October 2017
Draft proposed language for Legislative and Regulatory Committee consideration to synchronize expiration dates.	Policy Analyst	December 2017
If approved, present to the Board for consideration.	Policy Analyst	January 2018
If approved, begin the rulemaking process.	Policy Analyst	February 2018

- 1.2 Review the possibility of including continuing education requirements for both spectacle and contact lens dispenser licenses to protect consumers and maintain licensee competence.

Start Date: Q1 17/18		End Date: Q2 17/18	
Success Measure: Possibilities presented to the Board.			
Major Tasks		Responsible Party	Completion Date
Research other states' continuing education (CE) requirements for Opticians.		Policy Analyst	September 2017
Research consumer complaints from other state agencies that regulate opticians.		Policy Analyst	October 2017
Utilize consumer complaint reports received to research and identify any potential consumer harm.		Policy Analyst	November 2017
Bring research to DOC (Dispensing Optician Committee) for consideration.		Policy Analyst	November 2017
Bring DOC recommendations to the Board for consideration.		Policy Analyst	November 2017
If approved, draft legislative language.		Policy Analyst	November 2017

- 1.3 Continue monitoring and exploring opportunities to enhance BreZe utilization (e.g. 100% continuing education compliance, usage of national database, etc.) to increase staff productivity and promote licensee compliance with continuing education requirements.

Start Date: Q1 17/18		End Date: Q2 17/18	
Success Measure: Opportunities identified to increase continuing education compliance and staff productivity.			
Major Tasks		Responsible Party	Completion Date
Request an impact analysis to be done to determine the feasibility of continuing education (CE) compliance through a SIR.		Assistant Executive Officer	December 2017
Research other CE tracking companies to determine the feasibility developing interface with BreZe.		Assistant Executive Officer	December 2017

GOAL 2: EXAMINATION

The Board works to provide a fair, valid and legally defensible licensing exam (California Law and Regulation Examination) and exam process to ensure that only qualified and competent individuals are licensed to provide optometric services in California.

- 2.1 Recruit more subject matter experts to create examination questions in order to strengthen the diversity of the test.

Start Date: Q1 17/18		End Date: Q2 17/18	
Success Measure: Increased subject matter expert pool.			
Major Tasks		Responsible Party	Completion Date
Board member outreach to licensees through board meetings.		Policy Analyst	November 2017
Increase utilization of email, social media and newsletters.		Policy Analyst	September 2017
Partner with California Optometric Association (COA).		Policy Analyst	September 2017
Recruitment at continuing education events.		Policy Analyst	December 2017
Practice and Education Committee to review and revise, if necessary, the existing subject matter expert criteria.		Policy Analyst	December 2017

- 2.2 Analyze the examination requirements to evaluate for competency and the validity of the examination.

Start Date: Q2 18/19		End Date: Q3 18/19	
Success Measure: The analysis presented to the board.			
Major Tasks		Responsible Party	Completion Date
Collaborate with the Office of Professional Examination Services (OPES) to conduct an occupational analysis and a linkage study.		Policy Analyst	November 2018
OPES presents results to the board.		Policy Analyst	February 2019

- 2.3 Create a budget change proposal to secure funds so the Board can perform an occupational analysis on the registered dispensing optician program in order to check for validity of the examination.

Start Date: Q2 18/19		End Date: Q2 18/19	
Success Measure: Budget change proposal drafted.			
Major Tasks		Responsible Party	Completion Date
Collaborate with budgets to create a budget change proposal.		Executive Officer	November 2019
Create a budget change proposal.		Executive Officer	December 2019

- 2.4 Consider the feasibility of developing a state law exam for opticians to verify their familiarity with California laws.

Start Date: Q1 17/18		End Date: Q4 17/18	
Success Measure: Presenting recommendations to the Board.			
Major Tasks		Responsible Party	Completion Date
Research other states' requirements.		Policy Analyst	September 2017
Collaborate with the Office of Professional Examination Services (OPES) to determine costs and tasks associated with developing the law exam.		Policy Analyst	December 2017
Research brought to the Dispensing Optician Committee (DOC).		Policy Analyst	January 2018
Present DOC recommendation to the board for consideration.		Policy Analyst	April 2018
If approved, propose legislation.		Policy Analyst	April 2018

GOAL 3: Law and Regulation

The Board works to establish and maintain fair and just laws and regulations that provide for the protection of consumer health and safety and reflect current and emerging, efficient and cost-effective practices.

- 3.1 Review federal law to identify methods that will strengthen existing California legislation regarding the sale of contact lenses and eye glasses as a means of improving enforcement and enhancing consumer protection.

		End Date: Q4 17/18
Success Measure: Presentation made to the Board.		
Major Tasks	Responsible Party	Completion Date
Researching federal law related to contact lenses and eye glasses.	Policy Analyst	February 2018
Analyze and compare federal law with current state law to determine if improvements are needed.	Policy Analyst	February 2018
Present changes to the Dispensing Optician Committee (DOC) and Legislative and Regulatory Committee for review.	Policy Analyst	March 2018
Present recommendations to the Board.	Policy Analyst	April 2018

- 3.2 Contact members of congress and the Federal Trade Commission regarding the current 48 hour law to obtain information that would assist in closing existing loopholes.

Start Date: Q2 17/18		End Date: Q4 17/18
Success Measure: Federal Trade Commission and Congress contacted.		
Major Tasks	Responsible Party	Completion Date
Research federal law related to current 48-hour law.	Policy Analyst	February 2018
Contact the Federal Trade Commission and Congress.	Policy Analyst	February 2018
Bring before the Dispensing Optician Committee (DOC) and Legislative and Regulatory Committee for discussion and possible recommendation.	Policy Analyst	March 2018
Present recommendations to the Board.	Policy Analyst	April 2018

- 3.3 Continue prioritization for review and updates to existing statutes, legislation, and regulations, for both optometry and dispensing opticians, in order to identify whether or not they are the cause of enforcement delays and determine promulgation of new regulations.

		End Date: Q2 18/19	
Success Measure: Statues, legislation and regulations reviewed.			
Major Tasks		Responsible Party	Completion Date
Meet with enforcement and determine if current laws and regulations are the cause of enforcement delays.		Policy Analyst, and Lead Enforcement Analyst	August 2018
As needed, draft recommendations to amend necessary laws.		Policy Analyst	August 2018
Bring recommendations to the Legislative and Regulatory Committee.		Policy Analyst	October 2018
Present to the board for consideration.		Policy Analyst	November 2018

- 3.4 Continue partnering with the Medical Board of California to identify potential loopholes regarding online and kiosk refraction administration to enhance consumer protection.

Start Date: Q1 17/18		End Date: Q2 17/18	
Success Measure: Communicate with the Medical Board of California.			
Major Tasks		Responsible Party	Completion Date
Attend the Medical Board of California (MBC) board meeting.		Executive Officer	October 2017
Provide MBC with materials developed as a result of the board’s communication plan.		Assistant Executive Officer	March 2018

- 3.5 Review current methods and explore new opportunities to increase access to care (e.g. scope of practice, mobile clinics, new technology, tele-medicine).

Start Date: Q1 17/18		End Date: Q2 17/18	
Success Measure: Potential opportunities presented to the board.			
Major Tasks		Responsible Party	Completion Date
Research methods mobile clinics in other states and Department of Consumer Affairs' programs.		Policy Analyst	August 2017
Draft analysis report and recommendation to the Legislative and Regulatory Committee.		Policy Analyst	September 2017
Present to the board for consideration.		Policy Analyst	November 2017

- 3.6 Review and identify existing practice requirements with regards to unnecessary licensing barriers in an effort to reduce barriers to entry, enhance consumer access to care, and maintain consumer protection.

Start Date: Q4 17/18		End Date: Q2 18/19	
Success Measure: Licensing barriers identified.			
			Completion Date
Review the Little Hoover Report for clarification.			May 2018
Research all relevant practice requirements and identify possible licensing barriers.		Policy Analyst	May 2018
Research the feasibility to amend the current licensing survey to include questions related to licensing barriers.		Policy Analyst	January 2019
Connect with the three California schools regarding the potential accelerated program for international graduates.		Policy Analyst	January 2019

- 3.7 Explore the feasibility of proposing legislation to synchronize the expiration dates of all license types for a given individual.

Start Date:		End Date:	
Success Measure:			
Major Tasks		Responsible Party	Completion Date
Refer to 1.1			

GOAL 4: ENFORCEMENT

The Board protects the health and safety of consumers of optometric services through the active enforcement of the laws and regulations governing the safe practice of optometry in California.

- 4.1 Review enforcement timing between initial offense and when it is conveyed to the Board to act upon in order to protect the consumer and maintain patient access to care.

Start Date: Q3 17/18	End Date: Q2 18/19	
Success Measure: Reduced cycle times between the initial offense and when it is conveyed to the Board.		
Major Tasks	Responsible Party	Completion Date
Evaluate timelines of processing a complaint using quarterly Consumer Protection Enforcement Initiative (CPEI) measurements, timelines, and Quality Business Interactive Reporting Tool (QBIRT) reports.	Lead Enforcement Analyst	March 2018
Conduct outreach with insurance companies when they take action on a licensee.	Lead Enforcement Analyst	July 2018
Develop the materials and set the outreach dates in order to establish partnerships with local District Attorney’s Office and the legal system.	Lead Enforcement Analyst	July 2018
Establish partnerships with local District Attorney’s Office and the legal system to conduct better outreach when there is a judgment or settlement regarding a licensee.	Lead Enforcement Analyst	December 2018

- 4.2 Explore the feasibility of participating in the FBI rap back program to expedite and enhance enforcement efforts.

Start Date: Q2 17/18		End Date: Q2 17/18	
Success Measure: Completed analysis regarding the feasibility.			
Major Tasks		Responsible Party	Completion Date
Develop materials to educate all other Executive Officers about the Federal Bureau of Investigation’s (FBI) rap back program.		Executive Officer	October 2017
Meet with the Department of Consumer Affairs (DCA) executive team to garner support to determine the feasibility of participating in the program.		Executive Officer	October 2017
Meet with the Department of Justice (DOJ) to determine the feasibility of participating in the program.		Executive Officer	December 2017
Draft an analysis of the feasibility in participating in the program and all that is necessary to accomplish this.		Executive Officer	December 2017

- 4.3 Research the possibility of changing the statute to require licensees to self-report to the Board within thirty days of conviction or other disciplinary action as a means of expediting and enhancing enforcement efforts.

Start Date: Q3 17/18		End Date: Q4 17/18	
Success Measure: Drafted analysis.			
Major Tasks		Responsible Party	Completion Date
Research and evaluate whether other programs have a statute in place that requires licensees to self-report and the means in which to implement.		Lead Enforcement Analyst	February 2018
Research the political will to determine the possibility of proposing such a statute.		Lead Enforcement Analyst	February 2018
Draft an analysis of the findings relating to the licensee self-reporting.		Lead Enforcement Analyst	April 2018

- 4.4 Research the possibility of requiring licensees to enroll in the national practitioner’s databank to expedite and enhance enforcement efforts.

Start Date:		End Date:	
Success Measure:			
Major Tasks		Responsible Party	Completion Date
Jessica, your team indicated that you completed this objective. if you desire, please write out steps.			

- 4.5 Develop proactive methods to enforce the unlicensed sale and distribution of cosmetic contact lenses.

Start Date: Q2 17/18		End Date: Q4 17/18	
Success Measure: Methods are developed to enforce unlicensed sale and distribution of cosmetic contact lenses.			
Major Tasks		Responsible Party	Completion Date
Research and develop a plan of approach to actively seek unlicensed contact lens sales.		Lead Enforcement Analyst	March 2018
Utilize Food and Drug Administration’s (FDA) campaign materials and develop a board platform and/or additional materials to inform consumers, businesses, and other entities and encourage reporting.		Lead Enforcement Analyst	October 2017
Research relevant events/functions that distribute unlicensed cosmetic contacts and reach out and establish partnerships with the organizers of those expositions to certify vendors not to dispense nonprescription contact lenses and explore the feasibility of having a board representative be present.		Lead Enforcement Analyst	April 2018
Research and present to organizations, businesses, and other associations regarding the laws and regulations relating to the distribution of cosmetic contact lenses at events.		Lead Enforcement Analyst	May 2018
Reach out to social media promoters of cosmetic contact lens to educate them about the health and safety concerns (e.g. Facebook, Twitter, Instagram, Snapchat, YouTube, Bloggers).		Lead Enforcement Analyst	April 2018

- 4.6 Establish a partnership with DCA Boards and county and state organizations to identify and address unlicensed activity (e.g. contact lens sales and expired prescriptions) in an effort to protect consumers.

Start Date: Q1 18/19		End Date: Q1 18/19	
Success Measure: Established partnerships and conducted meetings.			
Major Tasks		Responsible Party	Completion Date
Meet with local District Attorney Offices about the issue of distribution of such lenses to determine a joint approach.		Lead Enforcement Analyst	July 2018
Meet with county health departments to obtain data of use.		Lead Enforcement Analyst	July 2018
Research online contact lens sales authority of other states to determine if educational materials can be distributed to their licensees.		Lead Enforcement Analyst	July 2018
Research and meet with all state agencies with inspection authority.		Lead Enforcement Analyst	July 2018

- 4.7 Review the corrective action for compliance (and revise if necessary) in order to deter unlicensed activity.

Start Date: Q1 17/18		End Date: Q2 18/19	
Success Measure: Corrective actions reviewed and revised where necessary.			
Major Tasks		Responsible Party	Completion Date
Update corrective action procedures to include follow-up investigations to identify repeat offenders.		Lead Enforcement Analyst	March 2018
Research other Department of Consumer Affairs (DCA) programs and their corrective actions.		Lead Enforcement Analyst	December 2018
Update citation templates.		Lead Enforcement Analyst	September 2017
Collaborate with the DCA Division of Investigation (DOI) and Federal Trade Commission (FTC) to enforce corrective action for compliance.		Lead Enforcement Analyst	July 2018

- 4.8 Analyze the 2012 disciplinary guidelines for optometrists and revise where necessary, to promote consistency and fairness with enforcement decisions and enhance consumer protection.

Start Date: Q2 18/19		End Date: Q2 18/19	
Success Measure: Revised disciplinary guidelines where necessary.			
Major Tasks		Responsible Party	Completion Date
Research and recommend proposed revisions to the 2012 disciplinary guidelines for consumer protection committee consideration.		Lead Enforcement Analyst	October 2018
Collaborate with legal counsel to draft regulatory changes needed.		Policy Analyst	October 2018
Present to Board for consideration and adoption of the recommended revisions.		Lead Enforcement Analyst, and Policy Analyst	November 2018
If approved, begin the rulemaking process.		Policy Analyst	November 2018

- 4.9 Adopt disciplinary guidelines for opticians to promote consistency and fairness with enforcement decisions and enhance consumer protection.

Start Date: Q1 17/18		End Date: Q2 17/18	
Success Measure: Adopted disciplinary guidelines for opticians.			
Major Tasks		Responsible Party	Completion Date
Propose revisions to optometry disciplinary guidelines to incorporate opticians for dispensing optician committee consideration.		Lead Enforcement Analyst	September 2017
Collaborate with legal counsel to draft regulatory changes needed.		Policy Analyst	September 2017
Present to Board for consideration and adoption of the recommended revisions.		Lead Enforcement Analyst, and Policy Analyst	November 2017
If approved, begin the rulemaking process.		Policy Analyst	November 2017

GOAL 5: OUTREACH

The Board proactively educates, informs, and engages consumers, licensees, students, and other stakeholders on the practice of optometry and the laws and regulations which govern it.

- 5.1 Review and educate licensees about the scope of practice for optometric assistants, opticians, RDO’s, CLD’s and SLD’s to mirror the letter and chart sent to optometrists clarifying privileges for specific licensing certifications in order to enhance consumer protection.

Start Date: Q3 17/18		End Date: Q1 18/19
Success Measure: Information disseminated.		
Major Tasks	Responsible Party	Completion Date
Research scopes of practice for optometric assistants, opticians, and RDO’s, CLD’S, AND SLD’S	Policy Analyst	Jan 2018
Consult with legal counsel.	Policy Analyst	Feb 2018
Coordinate with the Department of Consumer Affairs’ Digital Print services (DPS) to prepare an outreach campaign with the gathered information.	Policy Analyst	Mar 2018
Coordinate with the Public Relations Committee.	Policy Analyst	June 2018
Present to the board for approval	Policy Analyst	August 2018
If approved, disseminate through social media, website, email blasts, and traditional letter.	Policy Analyst	September 2018

- 5.2 Educate practitioners about current federal law regarding contact lens prescription release (48 hour law).

Start Date: Q3 17/18		End Date: Q1 18/19
Success Measure: Information disseminated.		
Major Tasks	Responsible Party	Completion Date
Research updated laws.	Policy Analyst	March 2018
Develop educational materials.	Policy Analyst	May 2018
Consult with legal to ensure the information being disseminated is accurate.	Policy Analyst	May 2018
Bring to the Outreach Committee.	Policy Analyst	June 2018
Present to the board for approval.	Policy Analyst	August 2018
If approved, disseminate educational materials.	Policy Analyst	September 2018

- 5.3 Educate licensees and registrants about advertising requirements (e.g. free eye exams, free 2nd pair of glasses, etc.) to avoid misleading the public and reduce licensee confusion.

Start Date: Q4 17/18		End Date: Q2 18/19	
Success Measure: Information disseminated.			
Major Tasks		Responsible Party	Completion Date
Research applicable laws.		Policy Analyst	May 2018
Develop educational materials.		Policy Analyst	June 2018
Consult with legal to ensure the information being disseminated is accurate.		Policy Analyst	June 2018
Bring to the Outreach Committee.		Policy Analyst	August 2018
Present to the board for approval.		Policy Analyst	November 2018
If approved, disseminate educational materials.		Policy Analyst	December 2018

- 5.4 Educate the public on how to adequately fill contact lens prescriptions based on expiration dates and quantity limits to increase awareness and enhance consumer protection.

Start Date: Q1 18/19		End Date: Q3 18/19	
Success Measure: Information disseminated.			
Major Tasks		Responsible Party	Completion Date
Research relevant laws.		Policy Analyst	August 2018
Develop educational materials for consumers.		Policy Analyst	September 2018
Consult with legal to ensure the information being disseminated is accurate.		Policy Analyst	September 2018
Bring to the Outreach Committee.		Policy Analyst	December 2018
Present to the board for approval.		Policy Analyst	January 2019
If approved, disseminate educational materials.		Policy Analyst	January 2019

- 5.5 Develop a public relations campaign to educate unlicensed sellers regarding contact lens distribution laws to mitigate future violations, therefore protecting consumers.

Start Date: Q4 17/18		End Date: Q2 18/19	
Success Measure: Information disseminated.			
Major Tasks		Responsible Party	Completion Date
Research relevant laws.		Policy Analyst	May 2018
Develop educational materials.		Policy Analyst	June 2018
Consult with legal to ensure the information being disseminated is accurate.		Policy Analyst	June 2018
Bring to the Outreach Committee.		Policy Analyst	August 2018
Present to the board for approval.		Policy Analyst	November 2019
If approved, disseminate educational materials.		Policy Analyst	December 2019

- 5.6 Promote BreEZe’s online renewal capability to licensees to decrease manual entries and improve staff efficiency.

Start Date: Q2 17/18		End Date: Q3 17/18	
Success Measure: 100% renewals processed online by 2020			
Major Tasks		Responsible Party	Completion Date
Update social media and website.		Policy Analyst	January 2018
Send email blast via LISTSERV.		Policy Analyst	January 2018
Partner with related professional associations including the California Optometric Association (COA) and the California Association of Dispensing Opticians (CADO).		Policy Analyst	January 2018
Create YouTube and Facebook Live videos of Professional Board Members promoting BreEZe		Policy Analyst	December 2017
Participate in conferences, symposiums, and other outreach events to promote BreEZe and assist licensees in signing into BreEZe and onboarding existing licenses		Policy Analyst	April 2018

- 5.7 Develop a communication plan utilizing technology to communicate more effectively with stakeholders, patients, and licensees.

Start Date: Q2 17/18		End Date: Q3 17/18
Success Measure: Communication plan developed.		
Major Tasks	Responsible Party	Completion Date
Research other licensing agencies.	Policy Analyst	December 2017
Develop and recommend a communication plan.	Policy Analyst	December 2017
Bring to the Outreach Committee.	Policy Analyst	December 2017
Present to the board for approval.	Policy Analyst	January 2018
If approved, implement communication plan.	Policy Analyst	January 2018

- 5.8 Develop a communication plan to raise awareness of the importance of children’s vision health and wellness.

Start Date: Q2 17/18		End Date: Q3 17/18
Success Measure: Communication plan developed.		
Major Tasks	Responsible Party	Completion Date
Research current issues related to children’s vision health and wellness.	Policy Analyst	December 2017
Develop and recommend a communication plan.	Policy Analyst	December 2017
Bring to the children’s vision workgroup.	Policy Analyst	December 2017
Present to the board for approval.	Policy Analyst	January 2018
If approved, implement communication plan.	Policy Analyst	January 2018

GOAL 6: ORGANIZATIONAL EFFECTIVENESS

The Board works to develop and maintain an efficient and effective team of professional and public leaders and staff with sufficient resources to improve the Board’s provision of programs and services.

- 6.1 Provide customer service training for staff to improve communication with stakeholders.

Start Date: Q1 17/18		End Date: Q3 17/18	
Success Measure: Increase in positive surveys and comments from stakeholders.			
Major Tasks		Responsible Party	Completion Date
Collaborate with SOLID regarding available trainings for staff members onsite and offsite.		Assistant Executive Officer	November 2017
Verify and monitor all staff has completed a customer service training every 2 years.		Assistant Executive Officer	September 2017
Connect with CPS HR Consulting Training Center for customer service training opportunities for staff.		Assistant Executive Officer	January 2018
Survey, monitor, and evaluate staff to determine effectiveness of the training received and the overall customer service.		Assistant Executive Officer	September 2017

- 6.2 Investigate technology options for conducting committee and special meetings to broaden access to stakeholders and consumers.

Start Date: Q1 19/20		End Date: Q1 19/20	
Success Measure: Options identified.			
Major Tasks		Responsible Party	Completion Date
Research other streaming opportunities for Board meetings i.e Facebook Live, Instagram Live, Periscope, and Twitch.		Policy Analyst	July 2019
Research cost effective options for stakeholders and consumers for alternative participation in meetings.		Assistant Executive Officer	July 2019

- 6.3 Provide teambuilding training or exercises to Board members to improve Board functioning.

		End Date: Q3 17/18
Success Measure: Training completed.		
Major Tasks	Responsible Party	Completion Date
Coordinate with SOLID to determine the feasibility to developing a team building exercise for board members.	Assistant Executive Officer	January 2018

- 6.4 Provide teambuilding exercises between Board members and staff to improve relationships.

Start Date: Q2 17/18	End Date: Q4 17/18	
Success Measure: Teambuilding events held.		
Major Tasks	Responsible Party	Completion Date
Schedule lunch or dinner during Sacramento Board meeting.	Assistant Executive Officer	January 2018
Schedule day lunch or dinner during quarterly board meetings for present staff.	Assistant Executive Officer	November 2017 April 2018
Coordinate with SOLID about potential opportunities for team building between staff and board members.	Assistant Executive Officer	January 2018

- 6.5 Improve communication and build relationships between the Governor’s office, legislators, and the Board to effectively achieve the Board’s objectives.

Start Date: Q1 17/18		End Date: Q1 19/20	
Success Measure: Improved relationships with Governor’s office and legislators.			
Major Tasks		Responsible Party	Completion Date
Research and attend a legislative day at the Capitol to meet the legislators and their staff.		Policy Analyst	February 2018
Partner with Board members to forge relationships with the legislature.		Policy Analyst	January 2018
Contacting author’s offices regarding specific bills impacting the board.		Policy Analyst	July 2020

Strategic Planning Process

To understand the environment in which the Board operates and identify factors that could impact the Board's success, the California Department of Consumer Affairs' SOLID unit conducted an environmental scan of the internal and external environments by collecting information through the following methods:

- An online survey sent to the Board's stakeholders, comprised of industry professionals, professional associations, California colleges, government agencies, consumers and others who expressed interest in the strategic direction of the Bureau. The online survey received 428 responses.
- Telephone interviews with all eleven Board members as well as interviews with the Executive Officer and Assistant Executive Officer in November, 2016.
- Focus group discussion with Board staff in November, 2016.

The most significant themes and trends identified from the environmental scan were discussed by the Board members and executive team during a strategic planning session facilitated by SOLID on January 26, 2016. This information guided the Board in the development of its mission, vision, and values, while directing the strategic goals and objectives outlined in this 2017–2020 strategic plan.



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This strategic plan is based on stakeholder information and discussions facilitated by SOLID for the California Board of Optometry in January 2017. Subsequent amendments may have been made after Board adoption of this plan.

Optometrist License Applications FY 16/17-17/18

OPT: Optometrist License
 BOL: Branch Office License
 SOL: Statement of Licensure
 FNP: Fictitious Name Permit

	FY 16/17	FY 17/18			
	Total	Jul	Aug	Sep	Total
Paper Exam Requests Received	79	2	2	1	5
Online Exam Requests Received	215	12	10	15	37
Approved Paper Exam Requests	77	2	0	2	4
Approved Online Exam Requests	208	11	9	12	32
Paper Exam Request Cycle Time (Avg.)	24	12	N/A	21	16
Online Exam Request Cycle Time (Avg.)	9	3	2	2	2
Expired/Withdrawn/Cancelled Applications	9	0	1	2	3
Exam Requests Pending	14	15	17	17	17
License Applications Opened	319	14	9	15	38
Licenses Issued	307	50	28	7	85
License Application Cycle Time (Avg.)	106	100	107	107	103
Expired/Withdrawn/Cancelled	50	4	2	7	13
License Applications Pending	166	126	105	106	106

Optometrist License Applications FY 16/17-17/18

OPT: Optometrist License

BOL: Branch Office License

SOL: Statement of Licensure

FNP: Fictitious Name Permit

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
BOLs	Paper Applications Received	30	2	1	1	4
	Online Applications Received	46	3	2	2	7
	Paper Applications Approved	24	7	1	0	8
	Online Applications Approved	35	4	0	2	6
	Avg. Cycle Time (Paper)	52	53	68	N/A	55
	Avg. Cycle Time (Online)	33	36	N/A	47	40
	Expired/Withdrawn/Cancelled	8	1	0	2	3
	Pending Apps	12	5	7	6	18

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
SOLs	Paper Applications Received	111	3	9	30	42
	Online Applications Received	134	19	14	10	43
	Paper Applications Approved	112	5	3	9	17
	Online Applications Approved	102	5	30	3	38
	Avg. Cycle Time (Paper)	26	31	22	30	29
	Avg. Cycle Time (Online)	23	46	29	19	31
	Expired/Withdrawn/Cancelled	28	1	8	8	17
	Pending Apps	25	36	18	38	38

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
FNPs	Paper Applications Received	99	6	6	2	14
	Online Applications Received	65	7	4	2	13
	Paper Applications Approved	79	4	5	4	13
	Online Applications Approved	63	2	1	2	5
	Avg. Cycle Time (Paper)	56	90	100	88	93
	Avg. Cycle Time (Online)	54	32	67	94	64
	Expired/Withdrawn/Cancelled	19	1	1	0	2
	Pending Apps	21	27	30	28	28

Optometrist License Renewals FY 16/17-17/18

OPT: Optometrist License
BOL: Branch Office License
SOL: Statement of Licensure
FNP: Fictitious Name Permit

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
OPTs	Paper Renewals Approved	1549	105	123	138	366
	Online Renewals Approved	2298	165	199	179	543
	Avg. Cycle Time (Paper)	12	7	7	9	8
	Avg. Cycle Time (Online)	5	6	5	7	6

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
BOLs	Paper Renewals Approved	231	0	0	0	0
	Online Renewals Approved	120	1	1	0	2
	Avg. Cycle Time (Paper)	9	N/A	N/A	N/A	N/A
	Avg. Cycle Time (Online)	0	0	0	N/A	0

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
SOLs	Paper Renewals Approved	185	8	10	10	28
	Online Renewals Approved	244	15	29	21	65
	Avg. Cycle Time (Paper)	4	6	2	2	3
	Avg. Cycle Time (Online)	0	26	0	0	6

		FY 16/17	FY17/18			
		Total	Jul	Aug	Sep	Total
FNPs	Paper Renewals Approved	945	1	1	0	2
	Online Renewals Approved	459	0	0	2	2
	Avg. Cycle Time (Paper)	7	2	251	N/A	127
	Avg. Cycle Time (Online)	4	N/A	N/A	0	0

Registered Dispensing Optician Applications FY 16/17-17/18

RDO: Registered Dispensing Optician

CLD: Contact Lens Dispenser

SLD: Spectacle Lens Dispenser

NRCLD: Non-Resident Contact Lens Dispenser

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
RDOs	Paper Applications Received	124	2	16	6	24
	Online Applications Received	0	3	10	10	23
	Paper Applications Approved	81	7	16	4	27
	Online Applications Approved	0	0	0	7	7
	Avg. Cycle Time (Paper)	103	101	102	145	108
	Avg. Cycle Time (Online)	N/A	N/A	N/A	30	30
	Expired/Withdrawn/Cancelled	32	0	2	0	2
	Pending Apps	45	43	51	56	56

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
CLDs	Paper Applications Received	101	8	7	6	21
	Online Applications Received	2	4	3	8	15
	Paper Applications Approved	70	14	12	1	27
	Online Applications Approved	0	1	0	1	2
	Avg. Cycle Time (Paper)	87	83	48	84	68
	Avg. Cycle Time (Online)	N/A	33	N/A	98	66
	Expired/Withdrawn/Cancelled	9	1	2	0	3
	Pending Apps	34	30	26	38	38

Registered Dispensing Optician Applications FY 16/17-17/18

RDO: Registered Dispensing Optician

CLD: Contact Lens Dispenser

SLD: Spectacle Lens Dispenser

NRCLD: Non-Resident Contact Lens Dispenser

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
SLDs	Paper Applications Received	365	16	32	9	57
	Online Applications Received	4	9	16	15	40
	Paper Applications Approved	304	24	25	9	58
	Online Applications Approved	N/A	0	0	2	2
	Avg. Cycle Time (Paper)	89	81	99	89	90
	Avg. Cycle Time (Online)	N/A	N/A	N/A	85	85
	Expired/Withdrawn/Cancelled	18	2	8	2	12
	Pending Apps	99	98	113	124	124

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
NRCLDs	Paper Applications Received	5	0	0	0	0
	Online Applications Received	0	0	0	0	0
	Paper Applications Approved	2	0	0	0	0
	Online Applications Approved	0	0	0	0	0
	Avg. Cycle Time (Paper)	86	N/A	N/A	N/A	N/A
	Avg. Cycle Time (Online)	N/A	N/A	N/A	N/A	N/A
	Expired/Withdrawn/Cancelled	2	0	0	0	0
	Pending Apps	2	2	2	2	2

Registered Dispensing Optician Renewals FY 16/17-17/18

RDO: Registered Dispensing Optician

CLD: Contact Lens Dispenser

SLD: Spectacle Lens Dispenser

NRCLD: Non-Resident Contact Lens Dispenser

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
RDOs	Paper Renewals Approved	454	8	53	45	106
	Online Renewals Approved	0	5	7	7	19
	Avg. Cycle Time (Paper)	68	27	61	27	44
	Avg. Cycle Time (Online)	N/A	10	148	148	112

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
CLDs	Paper Renewals Approved	445	19	28	42	89
	Online Renewals Approved	3	17	17	9	43
	Avg. Cycle Time (Paper)	26	107	71	52	70
	Avg. Cycle Time (Online)	97	1	0	18	4

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
SLDs	Paper Renewals Approved	987	40	61	68	169
	Online Renewals Approved	9	28	28	38	94
	Avg. Cycle Time (Paper)	30	43	49	46	46
	Avg. Cycle Time (Online)	82	2	4	11	6

		FY 16/17	FY 17/18			
		Total	Jul	Aug	Sep	Total
NRCLDs	Paper Renewals Approved	7	0	0	0	0
	Online Renewals Approved	0	0	0	0	0
	Avg. Cycle Time (Paper)	51	N/A	N/A	N/A	N/A
	Avg. Cycle Time (Online)	N/A	N/A	N/A	N/A	N/A