

November 1, 2021

Dear Dr. Chou,

The National Board of Examiners in Optometry (NBEO[®]) was recently made aware of the article published in this journal “Applicability of Entry to Practice Examinations for Optometry in Canada” by Stanley Woo, Patricia Hrynychak, & Natalie Hutchings.¹ The paper by Woo et al. advocates for the use of the Optometry Examining Board of Canada’s (OEBC) licensure exams over the NBEO series of licensure exams in Canada. Unfortunately, while conducting their research for this paper, Drs. Woo, Hrynychak and Hutchings never contacted NBEO to request information or confirm the accuracy of information about our exam series or exam development procedures. As a result, their paper reflects certain errors and a lack of information about NBEO processes and examinations.

The authors’ statement, “a review of the literature did not provide any direct evidence, for or against, that the NBEO is appropriate for the Canadian context” does not imply that there is evidence of the appropriateness of OEBC. The absence of a formal, statistical validity study to scientifically measure the appropriateness of NBEO examinations in the Canadian context does not mean NBEO examinations are necessarily inappropriate. It simply means there has yet to be a scientific study of face validity for either OEBC or NBEO. Banter about the absence of formal evidence of content or face validity is unproductive for policy decisions. **Until comparable validity studies are available for both NBEO and OEBC exams, no scientific or data-driven conclusions can be drawn.**

NBEO would also like to point out the conflict of interest within the paper. The paper by Woo et al. was funded by an unrestricted grant given by the Federation of Optometry Regulatory Authorities of Canada (FORAC).¹ The paper mentions that “the central pillar of FORAC’s strategic plan is to work towards one single and Canadian national entry-to-practice exam that is accepted by all the provinces.”^{1,2} Funding by an organization whose stated goal is one Canadian optometric licensure exam presents an inherent confirmation bias. The research presented by Woo et al. does not address the potential for confirmation bias nor do the authors offer any clear indicators that they acknowledged this potential for confirmation bias and actively worked against it throughout the research process. *Canadian Journal of Optometry* readers should be aware of the conflict of interest resulting in high potential for confirmation bias within the article due to the research being funded by an organization which has already announced its end goal, that coincides with the authors’ conclusions.

NBEO encourages the readers of this journal to review updated information about the NBEO examination series in order to accurately inform their understanding of the content, validity, and reliability of the NBEO examination series. Specifically, several items about NBEO in Table 4 are simply incorrect. Additionally, the authors state that “the sample of practitioners used to provide the context are limited to their own countries.” This statement is patently untrue. NBEO utilizes Canadian subject matter experts throughout our examination development and maintenance processes.

The full NBEO response can be found on the NBEO website (www.optometry.org/news).

Sincerely,

Jill Bryant, OD, MPH, FAAO, FSLs
NBEO Executive Director

Brooke Houck, PhD
NBEO Director of Psychometrics and Research



1. Woo, Hrynychak, Hutchings. Applicability of Entry to Practice Examinations for Optometry in Canada. *Canadian Journal of Optometry*. March 2022.
2. Consultation: Alternative Standards Assessment – NBEO. College of Optometrists of Ontario; 2019:1-169. Accessed October 27, 2021. <https://www.collegioptom.on.ca/wp-content/uploads/2016/06/COUNCIL-Consulation-Feedback-Alternative-Standards-Assessment-January-2019.pdf>