

Optometry Board of Australia GPO Box 9958 Melbourne Vic 3001

Via email: optomconsultation@ahpra.gov.au

Submission to OBA on consultation guidelines for continuing professional development for endorsed and non-endorsed optometrists

The Australian Society of Ophthalmologists (ASO) thanks the OBA for welcoming consultation on its proposed guidelines for continuing professional development for endorsed and non-endorsed optometrists (CPD guidelines).

The ASO recommends these CPD guidelines more comprehensively describe the knowledge, skills and behaviours required of optometrists who are endorsed to prescribe scheduled medicines in line with the National Prescribing Service MedicinesWise prescribing competencies framework¹.

The ASO also recommends these CPD guidelines specifically include education on the co-management of glaucoma treatment in line with RANZCO Principles for Collaborative Care of Glaucoma Patients. As specified in the OBA's guidelines for use of scheduled medicines, optometrists must provide a referral to ophthalmologists for Glaucoma treatment within 4 months after making any initial diagnosis. Therefore comanagement education on Glaucoma treatment going forward will ensure patients receive safe and effective treatment continuity.

The ASO also shares the concerns of RANZCO and AMA regarding to Board's proposed role in both accrediting and auditing CPD providers, which is inconsistent with AHPRA practice standards and also Australian and international practice which requires role clarity between these two functions² ³

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Contact

Katrina Ronne Manager, Policy and Communications katrina@aso.asn.au 07 3831 3006

¹ NPS: Better choices, Better health. Competencies required to prescribe medicines: putting quality use of medicines into practice. Sydney: National Prescribing Service Limited, 2012. http://www.nps.org.au/ data/assets/pdf file/0004/149719/Prescribing Competencies Framework. pdf

² Australian National Audit Office. Administering Regulation. Achieving the right balance. Better Practice Guide. 2014. Available from: http://www.anao.gov.au/Publications/Better-Practice-Guides/2013-2014/Administering-Regulation. Last accessed 10/11/2015.

³ Organisation for Economic co-operation and Development. OECD Best Practice Principles for Regulatory Policy. 2014. Available from http://www.oecd-ilibrary.org/governance/the-governance-ofregulators 9789264209015-en. Last accessed 10/11/2015.