



Consultation on registration standards

5 August 2011

Introduction

The Optometry Board of Australia (the Board) is releasing two registration standards for consultation and comments from interested parties:

1. registration standard for initial applications for general registration – to come into effect 1 December 2014 (appendix A), and
2. registration standard on limited registration for postgraduate training or supervised practice (under section 66 of the *Health Practitioner Regulation National Law Act* (the National Law) as in force in each state and territory) (appendix B).

These registration standards have been developed by the Board to require therapeutic qualifications for **initial** applications for general registration (*not renewal of general registration*) from 1 December 2014.

Section 38 of the National Law empowers the Board to develop, and recommend to the Australian Health Workforce Ministerial Council (the Ministerial Council), registration standards to deal with issues relevant to the eligibility of individuals for registration in the optometry profession or the suitability of individuals to competently and safely practise the profession.

The Board has developed and previously consulted on a range of registration standards that have now been approved by the Ministerial Council. The approved standards can be accessed at www.optometryboard.gov.au under *Registration Standards*.

The National Law requires the Board to undertake wide-ranging consultation on the content of proposed registration standards.

The draft standards found in **appendices A and B** are accompanied by background information and timelines for their introduction.

At the completion of the consultation on the content of these registration standards, the Board will recommend the registration standards to the Ministerial Council with any amendments deemed appropriate arising from the submissions received in the consultation process.

A link to the National Law is available on the AHPRA website under [Legislation and Publications](#).

Making a submission

The Board now invites interested parties to address their written comments on the content of the **draft registration standards** to Mr Colin Waldron, Chair, Optometry Board of Australia by COB **Monday 3 October** 2011.

Electronic submissions are preferred and can be made at optomconsultation@ahpra.gov.au.

Submissions are also able to be posted to the attention of the Chair, Optometry Board of Australia, GPO Box 9958, Melbourne Vic 3001.

Please note that all submissions received will be published on the Board's website unless indicated otherwise in your submission.

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Summary

The Optometry Board of Australia (the Board) released a consultation document in January 2011 calling for comments on the proposal for therapeutic qualifications to be included as a requirement for *initial* applications for general registration with the Board in Australia from 2014.

This was the first stage of an extensive consultation process for the Board to develop a proposed regulatory response to the change where from 2013 all students graduating from approved programs of study will be therapeutically qualified. These students will immediately qualify for an endorsement for scheduled medicines. Submissions received in this process are available on the Board's [website](#).

In developing a regulatory response, it has been important for the Board to consider the decisions made by the previous state and territory optometry registration boards relating to this matter. These decisions are summarised in the background section of this paper. The Board is also committed to providing all parties with fair and reasonable notice of any proposed changes to allow sufficient time for effective implementation.

The draft registration standards found in **appendices A and B** communicate the Board's proposed changes to come into effect on 1 December 2014 with the next significant dates at December 2019 and December 2029. These subsequent dates will see further proposed amendments to the general registration standard at the time.

Table 1 summarises the proposed timelines for implementation of the registration standards and the effect of this on key groups of registrants as of 1 December 2014 and beyond. **Appendix C** contains a series of flow charts that present these proposed changes in graphical form, including pathways for returning to the register or moving from non-practising to general registration.

There are two key stages in the implementation, distinguished by how the authority to prescribe is granted to optometrists under state and territory drugs and poisons legislation.

2014 Stage 1	Authority to prescribe, based on endorsement for scheduled medicines
2019 Stage 2	Authority to prescribe, based on general registration as an optometrist - no specific endorsement for scheduled medicines

The Board will work with the different states and territories to implement these changes in the event of approval of the registration standards by the Ministerial Council.

The proposed changes and timelines extend beyond 15 years (as outlined in Table 1) and are decisions of the current Board. The decisions and timelines will be reviewed at key stages by future Boards to ensure that they can continue to be implemented effectively.

Table 1: Summary of changes

The following **table** summarises the key changes and how the two registration standards will apply to different registrant groups. [Appendix C](#) contains a series of flow charts that present these changes in graphical form, including pathways for optometrists returning to the register after previously holding registration in Australia or moving from non-practising to general registration.

Registration Group	Stage ¹	Registration status	OANZ ² COE ³	Approved therapeutics program	Limited Registration Standard ⁴	ACOT ⁵
Hold general registration and endorsement	1 – from Dec 2014	Holds general registration and endorsement				
	2 – from Dec 2019	Holds general registration				
Holds general registration without endorsement	1 – from Dec 2014	Holds general registration with notation ⁶		Needs to complete to have notation removed		
	2 – from Dec 2019	Holds general registration with condition		Needs to complete by 2029		
Graduates from approved program of study	1 – from Dec 2014	Qualified for general registration and endorsement for scheduled medicines				
	2	Qualified for general registration				
Overseas-trained optometrist with therapeutic qualifications	1 – from Dec 2014	Limited registration, then general registration	Complete before limited registration application		Apply on successful completion of COE	Complete within 12 months as a condition of limited registration then apply for general registration
	2 – from Dec 2019	Qualified for general registration on successful completion of COE	COE incorporates assessment for therapeutics ⁷			
Overseas-trained optometrist without therapeutic qualifications	1 – from Dec 2014	Limited registration then general registration	Complete before limited registration application	Complete within two (2) years as a condition of limited registration then apply for general registration	Apply on successful completion of COE	
	2 – from Dec 2019	Needs to complete therapeutic qualifications overseas				

¹ Stage 1: Authority to prescribe **based on endorsement for scheduled medicines**. This will run from 1 December 2014 to 30 November 2019

Stage 2: Authority to prescribe based on general registration as an optometrist. **No specific endorsement for scheduled medicines**. This will commence on 1 December 2019.

² [Optometry Council of Australia and New Zealand](#)

³ OANZ Competence in Optometry Examination

⁴ Limited registration standard for postgraduate training or supervised practice

⁵ OANZ Assessment of competence in ocular therapeutics

⁶ The wording of the notation will indicate that the person is not qualified for endorsement for scheduled medicines. This will be finalised on further legal advice.

⁷ This will require input from the New Zealand Optometry and Dispensing Opticians Board and OANZ

Background

From 2013 all students graduating from approved programs of study will be therapeutically qualified. These students will immediately qualify for an endorsement for scheduled medicines. The Board believes this is an important step towards increasing the quality of health care offered by optometrists, and wishes to align all members of the profession with the same standard.

In developing the proposed regulatory response the Board has also considered the intention and decisions of previous state and territory optometry registration boards, the current training and projected endorsement numbers and the objectives of the *Health Practitioner Regulation National Law Act* (the National Law) and the National Registration and Accreditation Scheme (the National Scheme).

Historical decisions

The decision to include therapeutic qualifications in approved undergraduate programs was made by the Council of Optometry Regulation Authorities⁸ (CORA) in response to a series of changes to state and territory drugs and poisons legislation that allowed qualified optometrists to prescribe Schedule 4 medicines. Post graduate study was the original pathway for access to these qualifications that led to prescribing authority.

To ensure optometrists were appropriately trained and competent to prescribe the widest scope of optometric Schedule 4 drugs available, CORA requested that the Optometry Council of Australia and New Zealand⁹ (OCANZ):

- accredit all postgraduate therapeutics training programs against uniform standards, the effect of which was to ensure that graduates were trained to practise therapeutically throughout Australia and NZ and
- amend accreditation standards for undergraduate training, so that courses would only be re-accredited if all graduates were qualified for therapeutic endorsement.

This decision will be fully implemented from 2013 when all graduands from approved undergraduate programs in Australia and New Zealand will graduate with qualifications for general registration and endorsement for scheduled medicines.

Considerations under the National Law

The National Law establishes the National Registration and Accreditation Scheme (the National Scheme). The Board is required to consider the objectives of the National Scheme in its decision-making to ensure effective and efficient operation of the National Scheme. The objectives of the National Scheme are:

- a) to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered; and
- b) to facilitate workforce mobility across Australia by reducing the administrative burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction; and
- c) to facilitate the provision of high-quality education and training of health practitioners; and

⁸ CORA was the representative body of all the state and territory optometry registration boards and New Zealand before the introduction of the National Scheme on 1 July 2010

⁹ The accreditation authority for optometry in Australia and New Zealand

- d) to facilitate the rigorous and responsive assessment of overseas-trained health practitioners; and
- e) to facilitate access to services provided by health practitioners in accordance with the public interest; and
- f) to enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.

Objective (e) and (f) require the Board to consider the direct impacts of regulatory policy, over the long term, for workforce responsiveness and access to services. The Board's decisions need to be made within a reasonable timeframe to allow optometrists to have the education and competence to meet these changing needs that will come with an ageing population and increased burden of chronic disease.

Health Workforce Australia¹⁰ has developed a draft *National Health Workforce Innovation and Reform Strategic Framework for Action*. This framework talks about the need to build a health workforce that can adapt to the changing health care needs and service delivery models that will likely arise over coming years.

The Board and the Australian Health Practitioner Regulation Agency (AHPRA) will be working closely with Health Workforce Australia over coming years to focus on regulation that is supportive of health workforce reform. The Board believes the proposal for therapeutic qualifications to be a requirement for general registration is consistent with the direction of these reforms.

The Board has also been conscious of the COAG Principles of Best Practice Regulation in its considerations. The proposed changes, implemented over time and with a fair and reasonable lead time, communicate the Board's policy intent and provides clarity for the expected compliance requirements of the regulation. The proposed changes also allow for relevant and effective regulation of optometrists over time.

Current Pathways for registration endorsement

Applicants for endorsement for scheduled medicines under section 94 of the National Law must have completed either an approved program of undergraduate study that incorporates therapeutic units or an approved program of postgraduate study. These requirements are published in the Board's registration standard for endorsement for scheduled medicines.

Internationally therapeutically-qualified optometrists must complete an assessment of competence in ocular therapeutics conducted by OCANZ to apply for endorsement and those international-trained optometrists without eligible therapeutic training must complete an approved postgraduate program to apply for endorsement.

Successful completion of any of these different pathways confirms competence against the therapeutic competencies listed in the *Optometrists Association Australia Universal (entry-level) and Therapeutic Competency Standards for Optometry 2008*.

Endorsement numbers

There are currently 935 optometrists with an endorsement in scheduled medicines out of a total of nearly 4400 registered optometrists.

From 2013, there will be approximately 250 graduates per annum from Australian universities qualified to apply for endorsement of scheduled medicines. This number will increase as

¹⁰ <http://www.hwa.gov.au/wir/strategy>

graduates from the optometry programs at both Flinders University and Deakin University also graduate with these qualifications from approximately 2015 onwards.¹¹

Excluding postgraduate numbers, it is estimated that there will be another 2000 optometrists qualified for endorsement by the end of the decade. This trend of increasing endorsement numbers will then continue.

These projections have informed the Board's timelines in the proposed response.

Drugs and poisons regulation in state and territories

An endorsement for scheduled medicines indicates that the registered optometrist is qualified to prescribe or supply Schedule 2, 3, or 4 medicines to patients for the treatment of conditions of the eye, from a list approved by the Board. However, the endorsement does not indicate the optometrist is authorised to do so.

The authority to prescribe is granted through the relevant legislation in the different drugs and poisons legislation and regulations in each Australian state or territory. Each of the states and territories links the authority to prescribe with the section 94 endorsement in scheduled medicines in some way.

Historically, the variation in the lists of Schedule 4 medicines able to be prescribed by optometrists across the different states and territories was of concern for CORA. In response to these concerns, CORA requested OCANZ to make the changes (referred to above) to accreditation standards for both undergraduate and postgraduate therapeutics programs of study. Those changes ensured that optometrists completing approved programs of study were trained according to the level of competence to prescribe the most expansive list of scheduled medicines, and so able to practise in all Australian jurisdictions, as well as New Zealand.

It is proposed that the Board will liaise with state and territory governments to request additional legislative change from 2019 so that the authority to prescribe is linked to general registration rather than an endorsement. This would represent stage 2 of the proposed staged approach.

Consultation to date

The first stage of consultation on this matter was undertaken earlier in 2011. There were a total of 246 submissions received, with 87 per cent of these from individuals. The remainder of submissions were from stakeholders including group practices, government, education providers, OCANZ, corporate entities and the profession's association.

There were some key themes identified across the submissions, including the need for any changes, if they were to happen, to be introduced over time. A common theme amongst the submissions was the request to allow for a natural attrition process for optometrists currently holding general registration.

There was also a common theme of the barriers to access the current postgraduate courses including the mode of delivery, costs and availability. If the proposals of the Board are approved, the Board will need to review the accessibility to training over time to ensure that there are sufficient opportunities available to meet the regulatory requirements.

The Board would expect that, over time, education providers would work to improve access to these programs.

These issues reiterate the need for any proposed changes to be implemented over a number of years.

¹¹ Graduates from these programs will be eligible for registration with the Optometry Board of Australia when the programs are approved as a program of study by the Board.

Draft registration standards

The Board has developed two draft registration standards. The Board is calling for comments on the content of these draft registration standards.

1. Registration standard on general registration for initial applications – to come into effect 1 December 2014 (appendix A) and
2. Registration standard on limited registration for postgraduate training or supervised practice (s66 of the National Law (appendix B)

The premise for the draft registration standards is that the Board requires all *initial*¹² applicants for general registration to meet the same qualification regardless of where they have undertaken their pre-registration training and that any changes need to provide fair and reasonable notice to all parties.

The registration standard for postgraduate training or supervised practice (s66) will come into effect on immediate approval by the Australian Health Workforce Ministerial Council (the Ministerial Council) as it has wider application than for training for postgraduate therapeutic qualifications.

In the event of approval of these draft registration standards by the Ministerial Council, there are matters relating to Medicare provider numbers on which the Board will need to seek input from key Australian Government departments.

Following discussion with the Department of Immigration and Citizenship, the Board understands that there are a range of options in place at the moment that will allow for visa access for these applicants.

There are two key stages proposed in the implementation, distinguished by how the authority to prescribe is granted to optometrists under state and territory drugs and poisons legislation.

2014 Stage 1	Authority to prescribe based on endorsement for scheduled medicines
2019 Stage 2	Authority to prescribe based on general registration as an optometrist - no specific endorsement for scheduled medicines

The Board will liaise with the different states and territories to implement these changes over time in the event that the Ministerial Council approves the registration standards. This work will inform projected timelines and stages.

There will be work required with other key parties including OCANZ and the NZ Optometry and Dispensing Opticians Board with regard to amendments to the examination process and implications for applications for registration under the *Trans Tasman Mutual Recognition Act*.

In proposing the likely staged approach, the Board believes it is providing fair and reasonable notice of the outcomes to all concerned, including education providers, researchers, the OCANZ, and individual optometrists.

The details of Stage 1 are summarised in Figures 1 and 2 in [appendix C](#).

The details of Stage 2 are summarised in Figures 3 and 4 of [appendix C](#).

¹² That is applications from optometrists who have not held registration with the Optometry Board of Australia previously

It is anticipated that stage 2 will be implemented in an environment that may see different primary health care service delivery models and funding models in place. The Board has included the proposed elements of stage 2 in this document to communicate its intent over time. There will be further consideration and consultation on the content of this stage prior to its implementation. The decisions and timelines will be reviewed at key stages by future Boards to ensure that they can continue to be implemented effectively or if they need to be brought forward.

Appendix A: Registration standard for general registration for initial applications

Authority

The Board has developed this registration standard in accordance with section 38 of the *Health Practitioner Regulation National Law* (the National Law) as in force in each state and territory.

Summary

The Optometry Board of Australia has developed this registration standard in accordance with section 38 of the National Law.

This registration standard specifies the qualifications for general registration from 1 December 2014. From this date, these qualifications will also qualify someone for endorsement for scheduled medicines under section 94 of the National Law.

Scope

This registration standard applies only to **initial** applications for general registration from 1 December 2014.¹³

Requirements

To be qualified for general registration, an applicant must have successfully completed **one** of the following:

1. a Board-approved program of study¹⁴ that qualifies the applicant for general registration and endorsement for scheduled medicines,
2. a qualification that the Board considers to be substantially equivalent, or based on similar competencies to an approved qualification that qualifies the applicant for general registration and endorsement for scheduled medicines,
3. Competence in Optometry Exam (COE) and Assessment of Competence in Ocular Therapeutics (ACOT), or
4. Competence in Optometry Exam (COE) and a Board-approved program of postgraduate study in ocular therapeutics.

Review

This standard will commence on 1 December 2014 and will be reviewed by the Board at least every three years.

¹³ The standard does not apply to renewal of registration

¹⁴ As published on AHPRA website in accordance with section 49(7) of the National Law

Appendix B: Limited registration standard for postgraduate training or supervised practice (s66)

Authority

This registration standard has been developed under section 38 of the *Health Practitioner Regulation National Law* (the National Law) as in force in each state and territory.

It will be recommended to the Australian Health Workforce Ministerial Council (the Ministerial Council) for approval at the completion of a wide-ranging consultation about its content.

This section will then refer to the approval date, if granted, by the Ministerial Council.

Summary

The Optometry Board of Australia has developed this standard for limited research or supervised practice as defined in section 66 of the National Law.

It applies to all optometrists who are not qualified for general registration.

This registration standard sets out the requirements that an applicant for registration must meet to be granted limited registration to enable the applicant to practise as an optometrist whilst undertaking postgraduate training or supervised practice. All practitioners granted limited registration for postgraduate training or supervised practice must comply with the requirements for registration set out in this registration standard, including:

- compliance with a supervision plan, **and/or**
- compliance with a postgraduate training plan,
- authorising and facilitating the provision of regular reports from their supervisors to the Board regarding their safety and competence to practise where applicable,
- satisfactory progress to completion of postgraduate training, **and/or**
- satisfactory compliance with supervised practice position where applicable.

These requirements are established under this registration standard to ensure safe and competent practice for the period of limited registration.

The Board will include the requirements of limited registration on the National Register pursuant to section 225(p) of the National Law.

Scope of registration standard

This registration standard applies to optometrists applying for limited registration for postgraduate training or supervised practice, under section 66 of the National Law, or for renewal of limited registration for postgraduate training or supervised practice, under Part 7 Division 9 of the National Law.

Requirements for application for limited registration for post graduate training or supervised practice

The following requirements apply to those optometrists applying for limited registration for post graduate training and limited registration for supervised practice.

1. proof of identity as outlined in the application form approved by the Board for this registration standard,
2. evidence of English language skills that meets the Board's registration standard on English language skills,

3. evidence of having been awarded a primary degree in optometry that grants eligibility¹⁵ to sit the Competence in Optometry Examination (COE) conducted by the Optometry Council of Australia and New Zealand,
4. evidence of successful completion of the written Competence in Optometry Examination (COE) conducted by the Optometry Council of Australia and New Zealand,
5. evidence of work practice history that meets the Board's registration standard on recency of practice as evidenced in a CV in the standard format as outlined on the AHPRA website,
6. details of registration history including certificates of good standing/registration status from each registration authority with which the applicant has been registered in the previous five years (supplied directly to the Board from the relevant registration authority), and
7. satisfactory completion of a criminal history check undertaken by the Board that meets the Board's registration standard on criminal history registration standard.

Requirements on practitioners with limited registration for postgraduate training

The following requirements apply to those optometrists undertaking postgraduate training.

1. details of postgraduate training providing details of the purpose, anticipated duration, location, content and structure of training and the anticipated date of completion,
2. evidence of enrolment or an offer of acceptance from the education provider conducting the relevant program of study, and
3. any other information the Board requires under section 70 of the National Law to determine whether the applicant is a suitable person to hold limited registration.

Requirements on optometrists with limited registration for supervised practice

The following requirements apply to those optometrists undertaking supervised practice. A supervision plan will be required for all optometrists wishing to undertake clinical practice as an optometrist whilst undertaking postgraduate training.

1. sponsoring employer's written confirmation of offer of employment,
2. statement from the sponsoring employer including:
 - a) employer contact details,
 - b) position description including key selection criteria addressing clinical responsibilities and qualifications and experience required,
 - c) name, qualifications and contact details of the proposed clinical supervisor/s,
 - d) details of a supervision plan, prepared in accordance with any supervised practice guidelines issued from time to time by the Board,
3. written confirmation from the proposed supervisor that he or she agrees to provide supervision and to comply with supervision obligations as required by the Board, and
4. any other information the Board requires under section 70 of the National Law to determine whether the applicant is a suitable person to hold limited registration.

¹⁵ Refer to the [examination section](#) of the OCANZ website

Requirements on practitioners granted limited registration

The registration standard establishes the requirements of practitioners who are granted limited registration for postgraduate training or supervised practice.

The registrant is required to:

- comply with the supervision plan approved by the Board if applicable,
- comply with the postgraduate training plan approved by the Board if applicable,
- ensure that supervisors provide reports to the Board regarding the registrant's safety and competence to practise if applicable, and
- restrict his or her practice as an optometrist to the approved position or the clinical training requirements of any postgraduate training.

If a practitioner with limited registration for postgraduate training or supervised practice does not maintain employment in the designated position, he or she is unable to comply with the requirements on practice and therefore cannot practise optometry in Australia.

The Board will grant limited registration for postgraduate training or supervised practice for a period of up to 12 months.

Limited registration for postgraduate training or supervised practice may not be renewed more than three (3) times.

Requirements for renewal of limited registration

1. Renewal of limited registration for postgraduate training or supervised practice will be subject to the practitioner meeting the following requirements:
 - a) completion of an annual renewal form in accordance with section 107 of the National Law including an annual statement in accordance with section 109,
 - b) demonstrated compliance with any conditions or requirements on registration as listed in the postgraduate training plan and/or supervised practice plan,
 - c) satisfactory performance in the supervised practice position, and
 - d) any additional investigation, information, examination or assessment required by the Board in accordance with section 112 of the National Law.
2. The Board may refuse to renew the practitioner's registration if:
 - a) the practitioner's employment ceases or is terminated,
 - b) the practitioner fails to comply with an approved supervision plan,
 - c) the practitioner fails to comply with the postgraduate training plan, and/or
 - d) during assessment or supervision, deficiencies are identified in the practitioner's practice that the Board considers are significant.

Applications for variation in changed circumstances

If an optometrist holding limited registration under section 66 has a significant change in circumstances, such as a change from the original postgraduate training plan or a change in supervised practice position, he or she must submit a new application for limited registration. However, practitioners can apply to the Board for a variation if there is a minor change to their circumstances, such as a change in supervisor.

When making an application for a variation, the Board requires details of the change of circumstances from the sponsoring employer and confirmation from the registrant of agreement to the change in circumstances.

Supporting documentation of the change must be submitted.

If the Board considers that the variation is significant, it will require the registrant to submit a new application for limited registration for teaching or research.

Definitions

Supervision plan means a plan that sets out the arrangements or proposed arrangements for clinical supervision of the optometric practice of the optometrist holding limited registration.

Review

This standard will commence on [date once approved]. The Board will review this standard at least every three years.

Appendix C: Flow Charts

- Figure 1 Stage 1 Changes for initial applications for general registration
- Figure 2 Stage 1 Changes for existing general registrants and applications for returning to general registration
- Figure 3 Stage 2 Changes for all initial applications for general registration
- Figure 4 Stage 2 Changes for existing general registrants and applicants returning to general registration

Proposed stages of change

- 2014 Stage 1 Authority to prescribe based on endorsement for scheduled medicines. This will run from 1 December 2014 to 30 November 2019.
- 2019 Stage 2 Authority to prescribe based on general registration as an optometrist. There is no specific endorsement for scheduled medicines. This will commence on 1 December 2019.

Acronyms

1. ACOT OCANZ Assessment of Competence in Ocular Therapeutics
2. COE OCANZ Competence in Optometry Examination
3. OCANZ [Optometry Council of Australia and New Zealand](#)

Figure 1 Stage 1 Changes for initial applicants for general registration

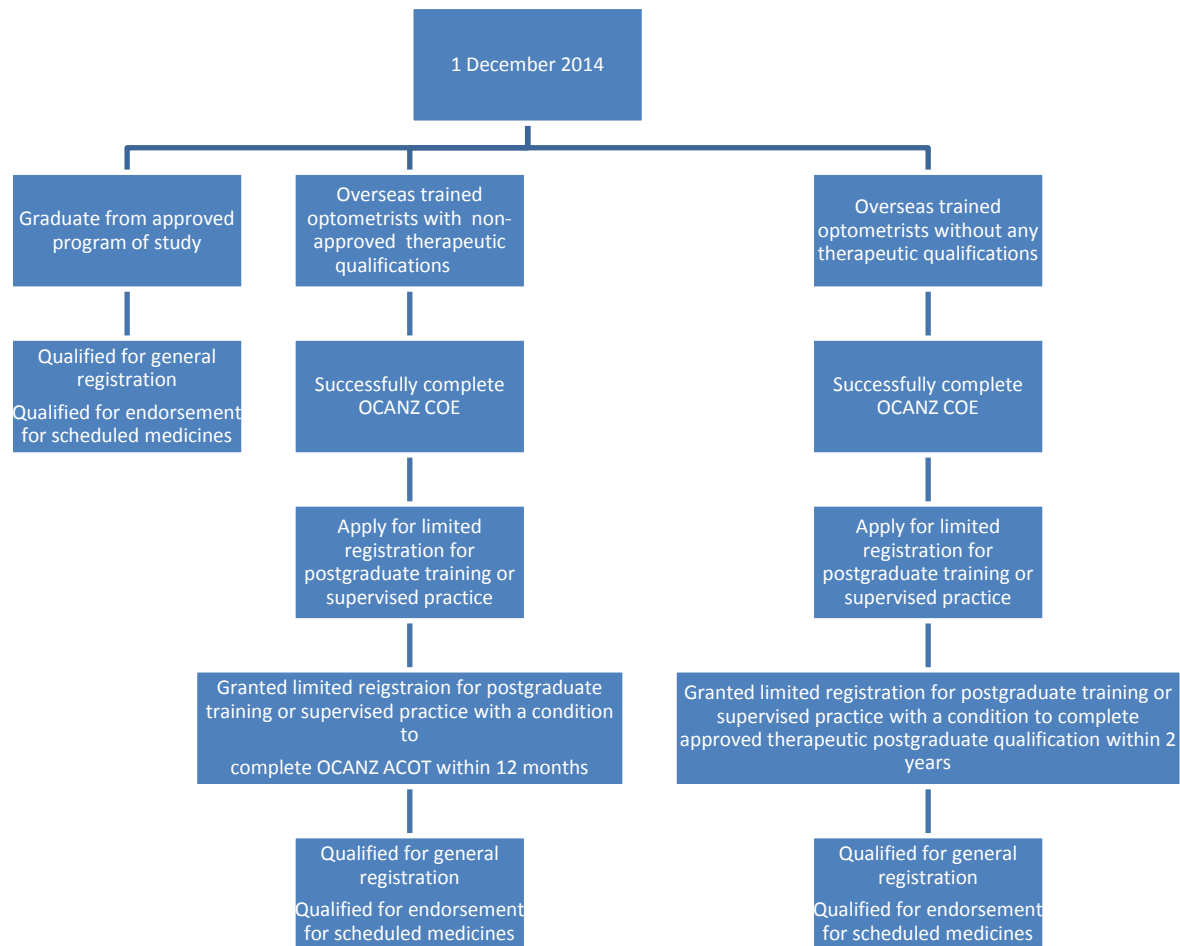


Figure 2 Stage 1 Changes for existing general registrants and applications for those returning to general registration after previously holding registration in Australia (returning to register)

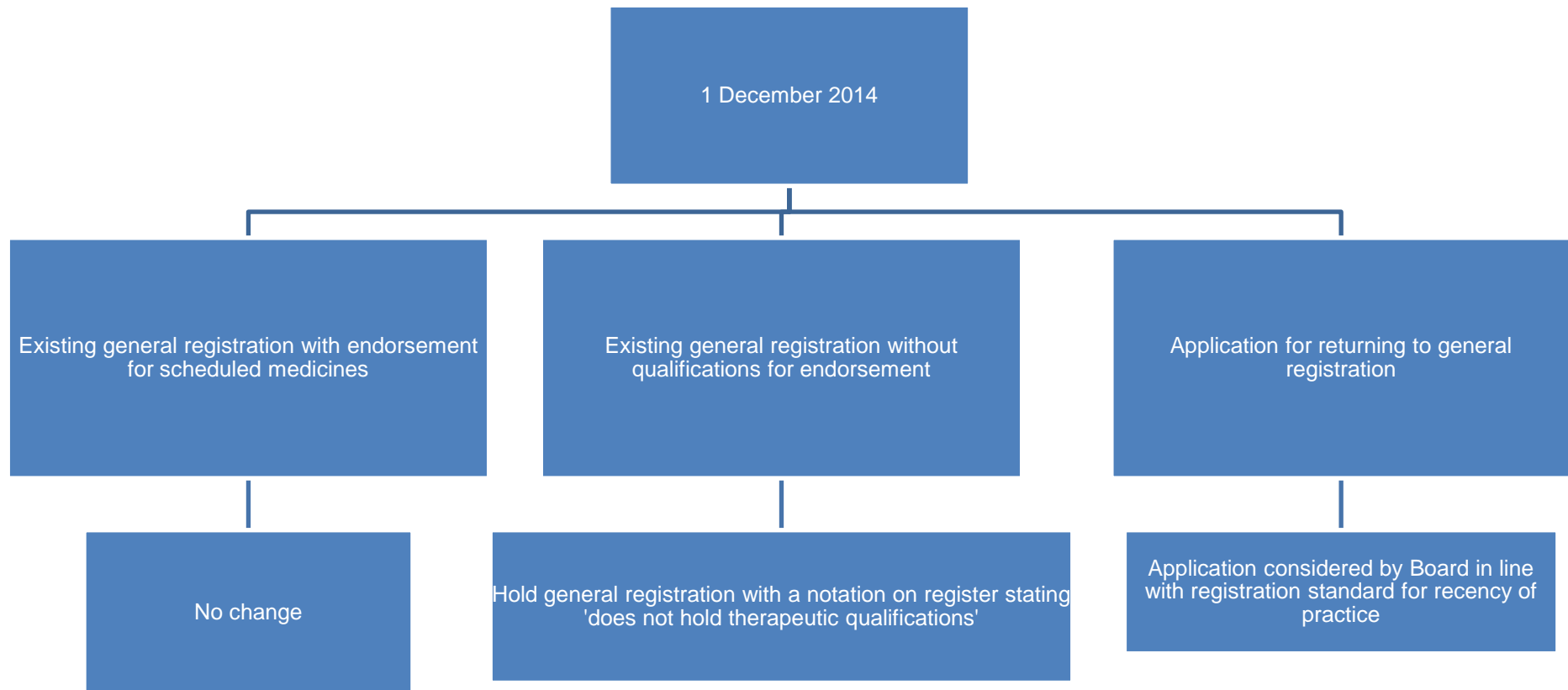


Figure 3 Stage 2 Changes for all initial applications for general registration

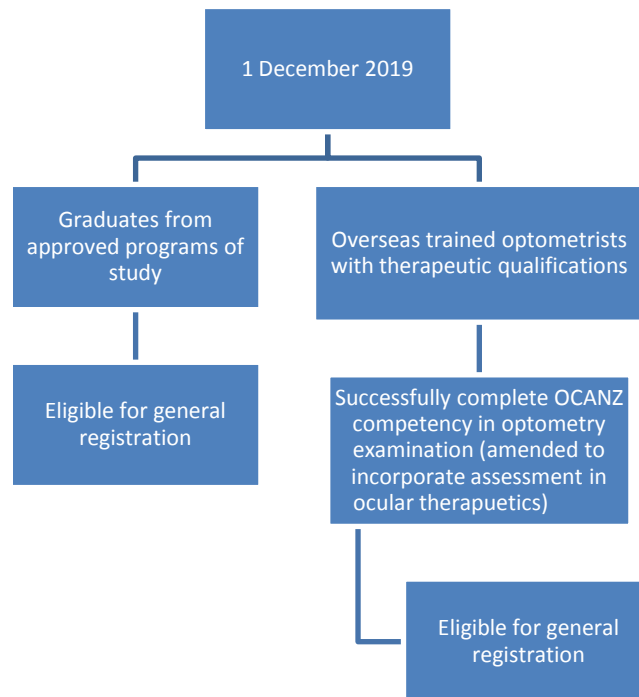


Figure 4 Stage 2 Changes for existing general registrants and applicants returning to general registration

