



## **Submission to Optometry Board of Australia: consultation on registration standards**

### **Introduction**

The Optometrists and Dispensing Opticians Board (ODO Board) of New Zealand is a statutory authority established under the Health Practitioners Competence Assurance Act 2003 (HPCAA). Its purpose is to ensure that optometrists and dispensing opticians are competent to practise their professions. The ODO Board is the New Zealand equivalent of the Optometry Board of Australia (OBA).

### **Issues**

#### **Date of amended OCANZ examination**

The OBA has proposed that from 1 December 2019 the OCANZ examination will be amended to begin examining for therapeutic skills and knowledge. As this change is likely to have implications for the ODO Board, the ODO Board considers that it is critical for the OBA to work with it and other OCANZ members on this matter and agree upon a date that the OCANZ examination should be amended to include assessment in ocular therapeutics. However, as the ODO Board is currently only in the early stages of considering the question of future optometry scopes of practice it is not yet in a position to fully discuss this issue.

In the meantime, one of the ODO Board's concerns regards the amended OCANZ examination and how it relates to the ODO Board's continued ability to register overseas practitioners. The ODO Board has two scopes of practice for optometrists, Optometry (Optometrist) and Optometry (TPA endorsement). The current OCANZ examination is the sole pathway used by the ODO Board for registration of non New Zealand and Australian trained optometrists to register in the Optometry (Optometrist) scope of practice in New Zealand. In the event that the OCANZ examination is altered to include therapeutic skills testing it will need to be done in such a way, and at a time that is suitable for both Boards, taking into account that the Boards have different legal compliance issues, and are at different stages of working out how to deal with non-TPA endorsed optometrists.

#### **Trans-Tasman Mutual Recognition Act**

The Board strongly agrees with the OBA's acknowledgement that it will need to work with the OCANZ and the ODO Board with regard to implications for applications for registration under the Trans-Tasman Mutual Recognition Act 1997 (TTMRA). From 1 December 2019 the OBA has proposed that there will be two pathways for applicants to initially apply for general registration. That is to say, applicants must be graduates from approved

programmes of study or overseas trained optometrists with therapeutic qualifications who have successfully completed the amended OCANZ competency in optometry examination.

Currently a New Zealand registered optometrist without a therapeutics qualification is able to gain registration in Australia (and vice versa) via the TTMRA as there is equivalency in the occupation of optometry between the two countries. The OBA will need to consider how its new registration standards from 1 December 2019 will affect a practitioner from New Zealand registering under the TTMRA. In implementing an appropriate process for dealing with non-therapeutically trained New Zealand applicants the OBA may need to consider what conditions may be used to bring about equivalency between the occupation of optometry in New Zealand and Australia.

It will also be important for the ODO Board and the OBA to ensure that any changes to registration standards do not provide a backdoor entry for registration under the TTMRA by making it easier to the register in one of the two countries first for the purpose of using the TTMRA to register in the other.

Thank you for the opportunity to comment on the proposal. The ODO Board has no objection to its submissions being posted on the OBA website. For any queries relating to this submission, please feel free to contact the ODO Board at [registrar@odob.health.nz](mailto:registrar@odob.health.nz).