



Optometrists Association Australia

Submission to Discussion Paper on amendments to the Health Practitioner Regulation National Law

ABOUT OPTOMETRISTS ASSOCIATION AUSTRALIA

Optometrists Association Australia is a non-profit organisation registered under the Victorian Companies Act. It is a federation of the six state optometric associations and has been in existence since 1904.

Around 95 per cent of practising optometrists in Australia are members of Optometrists Association Australia.

Contact details for the National and State Division Offices are at www.optometrists.asn.au.

Optometrists Association Australia welcomes the opportunity to comment on the Optometry Board of Australia's *Consultation document on registration standards* released on 5 August 2011.

As set out in the Association's submission to the first consultation process, while the ability to prescribe and use ocular therapeutic agents is regarded by the Association as a natural and desirable evolution of optometry as a primary health profession and the Association encourages all members to consider updating their skills as needed, the decision as to how professionals wish to practise is one entirely for individuals.

It remains the view of the Association that optometrists should be encouraged to obtain therapeutic endorsement as the ability to prescribe and use ocular therapeutic agents becomes the norm for the profession. However, practising optometrists who choose not to become therapeutically endorsed should be able to continue to practise as they do now without any changes to their current scope of practice or pressure to acquire therapeutic qualifications.

Those choosing to remain in the workforce without therapeutic qualifications should be 'grandparented' so they can retain their right to be registered and be allowed to practise as they do now. The way the OBA publicly describes the two types of registered categories through the publicly accessible register of optometrists may be sensitive and the Association is keen to work with the OBA so that the appropriate solution is found in the lead up to 2019.

The Association seeks to ensure that suitable arrangements cover optometrists currently working in non-clinical roles who choose to return to clinical practise. Specifically, as noted in the Association's first submission, such individuals should be able to return to practice according to their previous practice mode, assuming that they meet other relevant registration requirements such as CPD and Recency of Practice. Page 17, Figure 2 seems to support this position, as well as page 19, figure 4.

The Association does not consider that the OBA needs to make any decisions in relation to 2029, as flagged on page 4, Table 1 and page 19, Figure 4. We respectfully suggest that 2029 is too far in the future for the OBA to be making pronouncements which may bind future OBA Boards. There will be several opportunities for the OBA to review the Registration Standard in the lead up to 2029 in light of information about the profession including the pace at which current optometrists are undertaking therapeutic qualifications. Consequently, the Association does not agree to there being a condition imposed on existing practising optometrists to complete therapeutic qualifications by 2029, as enunciated on page 19, figure 2.

Comments about overseas trained optometrists

The Association notes that it is proposed that overseas trained optometrists have 2 years in which to complete their approved therapeutics program from December 2014 and that from 2019 they will be required to complete therapeutic qualifications overseas (page 4, Table 1). The Association seeks greater clarification about whether it would be appropriate to also permit an overseas trained optometrist without therapeutic qualification to undertake an approved therapeutics program in Australia OR overseas. We see no reason why this flexibility cannot continue to be provided. This would provide flexibility in how an overseas trained optometrist can gain their therapeutic qualifications from 2019 as is the case from 2014.

The Association also recommends that instead of a 2 year period in which an overseas trained optometrist has to complete their therapeutic qualifications, that overseas trained optometrists are required to commence therapeutic qualifications within two years and complete the course within 4-5 years to reflect the need for the overseas trained optometrist to settle into their new life in Australia and the fact that currently there is quite a lot of demand for therapeutic courses in Australia from currently practising optometrists, including the need for additional clinical training placements in ophthalmic environments.

General comments

The Association notes that in the event of the approval of the draft Registration Standards, there are matters relating to Medicare Provider numbers on which the Board will need to seek input from key Australian Government departments. It would be important for these arrangements to have been discussed before the Registration Standard becomes effective, to ensure relevant optometrists are not negatively affected by agreements not yet reached between APHRA / OBA and relevant Government Departments.

As flagged in the Association's first submission, we continue to be concerned about the lack of available course placements for postgraduate training. This is especially the case for compulsory clinical placements. If the OBA adopts the Association's proposal to enable current registrants who chose not to acquire therapeutic qualifications to continue to practise as they do now, there will be less immediate pressure for large numbers of optometrists to do postgraduate therapeutics training.

Body of Submission

Appendix A Draft Registration Standard on general registration for initial applications – to come into effect 1 December 2012

The Association notes that this draft Registration is intended only to apply to **initial** applications for general registration from 1 December 2014. Page 8 of the consultation document defines initial "*that is applications from optometrists who have not held registration with the Optometry Board of Australia.*"

That is, this draft Registration Standard does not propose to apply to an optometrist whom at any other time has held registration as an optometrist in Australia. For example, someone who has let their registration lapse will not be covered by this draft Registration Standard when they go to renew their registration to recommence practising as an optometrist.

Appendix B Draft Registration Standard on limited registration for postgraduate training or supervised practice (section 66 of the National Law).

The Association notes that the draft registration standard in Attachment B refers to (under the title **Summary** : ‘The Optometry Board of Australia has developed this standard for limited research or supervised practise as defined in section 66 of the National Law.’ We query whether the use of the word ‘limited research’ is appropriate and suggest the use of the words ‘postgraduate training’ may be more appropriate given the text of section 66 of the National Law refers to postgraduate training or supervised practice.

Under the section entitled **Requirements on optometrists with limited registration for supervised practice**, section 3, there are references to ‘...supervisor obligations as required by the Board’. The Association notes that the OBA is currently seeking comments on draft Guidelines for supervision of optometrists which provides greater detail about this and other requirements related to the supervision of optometrists. The OAA anticipates that it will provide comments on this draft Guideline during the consultation period for consideration of the OBA.

Under the section entitled **Requirements on practitioners granted limited registration**, the Association seeks a greater understanding about whether there may be some latitude provided to practitioners granted limited registration for postgraduate training or supervised practice for a period of greater than 12 months if there are extenuating circumstances which prevent the practitioner from completing their obligations within the 12 month period.

Under the section entitled **Applications for variation in changed circumstances**, there is a reference for a requirement for a new application is the variation is significant for ‘teaching or research’- is this the only category requiring a new application if the variation is significant or is it meant to cover other situations.

As noted above, for overseas trained optometrists entering Australia without any therapeutic qualifications, the draft Registration Standard proposes that from 2014, these people have 2 years in which to complete their approved postgraduate therapeutic qualification (page 16, Figure 1 and page 4, Table 1). Following consultation with members, the Association recommends the OBA consider the requirement that overseas trained optometrists are required to commence therapeutic qualifications within two years and complete the course within 4-5 years. This request reflects the fact that someone coming to Australia will take some time to adjust to the new environment and actually may be unable to complete the course within the allotted 2 year period given the current demand for therapeutic training.