



18 May 2012

Mr Colin Waldron
Chair
Optometry Board of Australia
GPO Box 9958
Melbourne 3001

Dear Colin,

Thank you for the opportunity to provide the ACO's views relating to the Board's public consultation on proposed amendments to its:

1. Continuing professional development registration standard.
2. Guidelines on continuing professional development for endorsed and non-endorsed optometrists.

We would appreciate the Board's consideration of the following:

General Comments

As an approved provider of CPD, and having implemented a comprehensive and diverse CPD program for many years, the College is well placed to contribute to this public consultation. The ACO generally supports and applauds the proposed key changes as indicated in the amendments to the standard and guidelines, particularly in relation to:

- Improved flexibility for optometrists so they are more able to meet CPD requirements
- New technologies to be incorporated into the accreditation framework, such as interactive Webinars, online assessments, DVDs/CDs of seminars
- Interactive Webinars classified as face-to-face CPD

Specific Comments Relating to Key Changes

1. Incorporate a two year rollover for requirements

The ACO supports the two year rollover for optometrists to meet their CPD requirements. In addition, given the Board was particularly conscious of rural and remote practitioners who face difficulty in meeting the requirements in 12 months, it is important that other CPD requirements are not too onerous for these optometrists. For example, there is still a requirement to meet a minimum 24 points of face-to-face CPD activities over two years. Accordingly, the ACO supports the inclusion of interactive Webinars as face-to-face CPD.

2. Remove the CPD exemption for new graduates

Previous ACO submissions to the Board have called for the removal of the CPD exemption for new graduates and we continue to support this proposal. In the past, the ACO has suggested the CPD requirements could perhaps be modified to a percentage of the full load (for example 50% of: total points, face-to-face CPD, therapeutic education) due to a new graduate's currency of knowledge. The ACO also supports the requirement that new graduates meet the full CPD load or a percentage between 50% and the full load.

6. Remove the national office of the OAA from approved provider list, indicating that activities provided by this office will be accredited by the CPDAC

It is critical to manage perceived conflict relating to an approved CPD provider that is also in the position of accrediting CPD on behalf of the OBA. On the other hand, it appears unjust for an approved CPD provider to relinquish its right to approve its own CPD, when approval is based on a clear framework provided by the Board. A preferable model would be that the OBA manages the accreditation of non approved providers internally (perhaps resourced with funds from registration fees) or other model which does not compromise an approved CPD provider.

Comments Relating to Appendix A: Criteria for continuing professional development activity accreditation

A4 Learning Objectives

The ACO strongly supports the provision of learning objectives for CPD activities to assist optometrists in selecting CPD that meets their learning needs, however the requirement to provide a minimum of three learning objectives for each hour is rigid and could be difficult to implement. For example: a three hour course will need to indicate a minimum of nine learning objectives; a full day refresher course, would need to indicate over 20 learning outcomes. It is also important that the learning objectives are meaningful and not developed for the sake of meeting a requirement.

Therefore, it is suggested all CPD activities should provide learning objective(s), which are dependent on the objectives and content of the activity, with no minimum number.

A6 Assessment

The ACO has recently developed an online assessment system which offers an easy and efficient method for optometrists to obtain additional CPD points for the majority of ACO CPD. It is expected over 2000 online assessments will be completed in 2012.

The College supports the inclusion of a feedback mechanism to participants at the time of assessment so they can review their results in the context of their CPD plan. Using the online assessment system, participants could select multiple choice options to identify the correct answer. On this basis, all participants would complete the assessment with 100% success and receive CPD points according to the CPD framework.

Please do not hesitate to contact me should you wish to discuss these comments further.

Yours sincerely,



Professor Sarah L Hosking
Chief Executive Officer