



Optometry Council of New South Wales

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Mr Ian Bluntish
Chair
Optometry Board of Australia

By email: optomconsultation@ahpra.gov.au

Dear Mr Bluntish

Revised guidelines -

- **for continuing professional development for endorsed and non-endorsed optometrists**
- **on the prescription of optical appliances**

The Optometry Council of New South Wales appreciates the opportunity to comment on the Board's proposed revised guidelines and provides the following feedback:

*With regard to the **revised CPD guidelines**:*

Exemptions:

Experience to date shows that the vast majority of practitioners who fail to meet the CPD requirements due to "exceptional circumstances" do not "notify the Board of their circumstances as soon as possible." but, *after renewal*, get caught up in the audit system or apply "after the event".

The most common circumstances relate to maternity/paternity leave and/or serious health issues with exemptions granted well after the "event" and usually with a notification and or warning about fulfilling registration requirements. It is fair to state that the process is either poorly understood or ignored by registrants due to the stress involved in their "exceptional circumstances", usually ill health or new baby. Active consideration of the various practise requirements are therefore not a priority to these practitioners.

Consideration should be given to streamlining the process so that those registrants are not treated as "non compliant" to the required standard. In terms of being "safe to the public", it really doesn't make any difference when the Board grants an exemption as, in granting the exemption, the Board has agreed that the practitioner is indeed "safe".

The electronic renewal format does not encourage a declaration of failing to meet the standard and "live" application for exemption at time of processing, indeed it may encourage "taking a chance".

Simplicity and Consistency:

As the public safety goals of the standard and guideline can only be achieved if the registrants understand and comply with the standard, the Board should also consider having consistency in the various time frames in relation to Standards and Guidelines;

- clinical CPD over 2 year period;
- CPR for CPD over 3 year period
- exemptions for CPD over a 4 year period
- RoP over a 3 year period (included here to emphasise inconsistency)

Where simplification would aid understanding and compliance the Board should consider if:

- the large number of types of CPD tabulated and the varying point value is still appropriate;
- the varying sub categories and limits (face to face, sponsored, accompanied by a meal, etc) are still appropriate;
- more emphasis should be placed on self reflection, learning needs and the associated templates, rather than the point scores ("what do I need to learn ?" rather than "How many points do I need/can I get by November 30?");
- If period of time should be rolling or fixed to the registration date on December 1.

*With regard to the revised **guidelines on the prescription of optical appliances**, the Council offers the following comments:*

Page 23 Preceding ocular examination:

It is suggested that “should normally “ be replaced with the Optometrist “would usually” or “would usually unless there are particular reasons not to carry out an ocular examination”.

Page 25 Confidentiality:

This section would benefit from an introduction such as “Optometrists have a legal obligation to protect the privacy of patients”. An Optometrist should seek the consent from patients before disclosing information, as required under privacy legislation.

Yours faithfully



Albert Lee
President