

Public consultation on revised guidelines

September 2015

Responses to consultation questions

Please provide your feedback as a word document (not PDF) by email to optomconsultation@ahpra.gov.au by close of business on 20 November 2015.

Stakeholder details

If you wish to include background information about your organisation please provide this as a separate word document (not PDF).

Organisation name

Australian College of Optometry

Contact information

(please include contact person's name and email address)

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Your responses to consultation questions

Proposed revised guidelines for continuing professional development for endorsed and non-endorsed optometrists

Please provide your responses to any or all questions in the blank boxes below

1. Are they clear and easy to understand?

The guidelines are generally clear and easy to understand. However clarification is required in the following area:

Page 20, Appendix B of the revised criteria - 'Be a tertiary institution or an entity affiliated with a tertiary institution which is subject to an external accreditation and audit process'.

We suggest the following wording to clarify this point:

"Affiliation is an agreement entered into between a University and an organisation for the purposes of common interests in research and teaching. The OBA proposes that organisations affiliated with a University are able to be approved CPD providers in their own right. This does not require the University to develop or apply any quality assurance programs for this purpose or to incur any costs."

Proposed revised guidelines for continuing professional development for endorsed and nonendorsed optometrists

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2. Is there any content that needs to be changed or deleted?

Refer to Q 1

3. Is there anything missing that needs to be added?

Refer to Q1

4. Are there any practical issues encountered for the assessment of CPD activities?

Refer to Q 1

5. Do you have any other comments?

The following comments relate to the Consultation Documentation and not specifically to the Guidelines.

- 1. On page 4 of the document, under 'Potential Benefits of the Proposal', it is stated that the Board has a responsibility to assist registered practitioners by providing a CPD alternative that, "...undergoes independent quality control to ensure the expectations are met." To achieve independence, we propose that the accreditor should comprise a committee of suitably experienced independent members, rather than an organisation which itself is s provider of CPD.
- 2. Page 4 of the consultation document refers to the Board not possessing the expertise to undertake 'these objectives'. It is not clear what is meant with 'these objectives' are they the 4 dot points listed at the top of the page?

Proposed revised guidelines on the prescription of optical appliances

Please provide your responses to any or all questions in the blank boxes below

6. Are they clear and easy to understand?

Yes.

7. Is there any content that needs to be changed or deleted?

No.

8. Is there anything missing that needs to be added?

No.

9. Do you have any other comments?

No further comments.