

**Department of Optometry and Vision Science (DOVS) at the University of Auckland (UoA) Response to the Optometry Board of Australia's**

**“Consultation document on proposal for therapeutic qualification to be included as a requirement for general registration “.**

**Statements from the Optometry Board of Australia**

Current endorsement arrangement:

Under section 94 of the Health Practitioner Regulation National Law Act (the National Law) as in force in each state and territory, the Board may endorse the registration of an optometrist as qualified to prescribe or supply Schedule 2, 3, or 4 medicines to patients for the treatment of conditions of the eye, from the approved list published in the Board's Endorsement for scheduled medicines registration standard.

The Board estimates that approximately 800 of Australia's ~4000 optometrists have their registration endorsed for scheduled medicines.

The OBA sees three consequences

1. From 2014, therapeutic qualification will be the expected minimum-entry qualifications for optometrists.

The Department of Optometry and Vision Science at the University of Auckland (DOVS at UoA) agrees with this statement.

2. From 2014, there will be two levels of practice within the profession

DOVS at UoA disagrees with part of this statement. We note that this situation is NOT new and has existed for about 10 years - since the first cohort of currently practising optometrists completed the ocular therapeutics course at the University of Melbourne and became therapeutically endorsed by the Optometrists Registration Board of Victoria. The first optometrists entering the profession with therapeutics endorsements came from the expanded (5 year) undergraduate optometry programmes of both the University of Auckland and the University of Melbourne in 2006.

A better way of phrasing the statement is that from early in the 1990s two scopes of practice have existed within the profession.

3. If (the) current arrangements remain in place, the majority of optometrists entering the profession from overseas may not meet the qualification standard demanded of new graduates of local courses

DOVS at UoA sincerely hopes that the current arrangements for allowing overseas optometrists without therapeutic competencies to enter general practice in Australia and New Zealand do not remain in place.

We feel that the situation that currently exists is completely inequitable. The optometry registration authorities in New Zealand and Australia have, through the Optometry Council of Australia and New Zealand (OCANZ), mandated since 1999 that local optometry programmes introduce training in ocular therapeutics or lose their accredited status.

All the schools of optometry in our two countries currently have therapeutics programmes in place. DOVS at UoA fails to see why optometrists without training in ocular therapeutics are still permitted to enter general practice in New Zealand and Australia.

The continuation of this double standard undermines optometry education in New Zealand and Australia.

Why should the New Zealand and Australian Governments continue to fund expensive five-year programmes to train new optometrists when the Optometry Board of Australia, through the current policy on overseas graduates, is:

- (i) saying that optometrists with a four year training that excludes therapeutic pharmaceutical agents are perfectly adequate to enter the profession in Australia,
- and
- (ii) implying that the local standard of education is un-necessarily high?

It is important that the funding of local (Australian and New Zealand) optometry education not be undermined. Where local optometry education is not present the profession loses its research base and the major source of leaders of the profession.

[The Board is considering the proposal that therapeutic qualification become a requirement for general registration.](#)

The response of DOVS at UoA has considered several factors and is given under the headings below.

### **Optometrists entering practice in Australia or New Zealand for the first time**

#### ***Endorsement***

DOVS at UoA strongly endorses the proposal that therapeutic qualification become a requirement for all optometrists entering general practice in New Zealand and Australia.

#### ***Recommendation***

DOVS at UoA recommends that this proposal be implemented as soon as possible and certainly as soon as the final non therapeutically qualified group of students from QUT have been able to register.

### **Optometrists who have been practising in NZ or in Australia and who are returning to practice after a period without “recency of practice”**

DOVS at UoA is divided about a proposal that therapeutic qualifications become a requirement for all optometrists returning to practice in New Zealand and Australia.

We have seen the poor state of knowledge and questionable competency of practitioners who have not maintained recency of practice because they have taken several years away from practice to pursue other goals. Our experience in providing re-training would lead us to propose that such practitioners be required to undertake *more* than just a period of supervision. We would like to recommend that they complete a therapeutic qualification based on this observation.

However we recognise that such a policy may be seen as discriminatory against women who have ceased practice to raise a family and who now wish to return to the profession.

We recommend that the Optometry Board of Australia balance the need to meet anti-discrimination considerations against the need for a robust means to protect the public and to ensure that practitioners returning to practice are competent and safe.

## **Educator optometrists**

### ***Recommendation***

DOVS at UoA recommends that the Optometry Board of Australia create a separate registration category “educator optometrist” as the New Zealand Optometrists and Dispensing Board has done. This category would allow universities to offer academic positions to senior experienced optometrists with specialist areas so that they can provide clinical teaching with patient responsibility in their specific areas of expertise/specialty.

The purpose of this proposal is to allow local schools of optometry to benefit from overseas experts in specialty fields.

As academic optometrists with this kind of expertise are likely to have had to allow some areas of practice to lapse, public safety can be guaranteed by allowing these optometrists to practice only within the university environment. Their employer (the university) would be required (e.g. as part of the OCANZ accreditation process) to demonstrate that the clinical teaching responsibilities of educator optometrists remained within the fields of expertise. Educator optometrists wishing to practice outside a university environment could do so only if they satisfied the ordinary registration requirements of the Optometry Board.

## **Optometrists currently practising in Australia or New Zealand without qualifications in Therapeutic Pharmaceutical Agents**

### ***Background***

Schools of Optometry that have run conversion courses to up-skill practising optometrists for expanded scopes of practice have found it un-economic to run conversion courses for longer than about 5 to 7 years after the year of introduction of expanded scope.

Within this time motivated and progressive optometrists will have taken the postgraduate course provided. Towards the end of this time those participating are the ones who feel pressured to take the course. The NZ experience is that even reluctant practitioners find that the knowledge and experience gained is "eye opening" in relation to missed pathology.

In NZ we have experience of requiring optometrists to complete theory and practical courses to remain registered. A 5 year window of time (2005-2010) was provided by the NZ Board for practitioners without skills at the use of diagnostic pharmaceutical agents (DPAs) to complete a theory and skills course.

The NZ experience is that a number of practitioners who are nearing retirement age will cease practice rather than obtain the skills and knowledge that their contemporaries and their younger colleagues possess.

***Recommendation***

DOVS at UoA recommends that serious consideration be given by the Optometry Board of Australia to requiring all practicing optometrists to take advantage of the post-graduate ocular therapeutic courses that are currently still running. These courses are those of UNSW and QUT.

If the OBA were to introduce a requirement that competency in therapeutic pharmaceutical agents be obtained, the ocular therapeutics courses could remain in place for perhaps a total of 10 to 15 years.

It is probable that the NZ post-graduate course in ocular therapeutics run by DOVS at UoA which will be re-activated for one more year in 2012, could be extended (or re-activated again at a later date) to assist in training.

If 200 optometrists were to complete ocular therapeutics training each year for 15 years, most of the non therapeutically endorsed optometrists (the Board's current estimate is 3200) would have an opportunity to up-skill.

End of submission