

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

The Optometry Board of Australia is seeking the views of interested parties on a proposal that therapeutic qualification be a requirement for general registration of optometrists in 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.

Eligibility for endorsement is contingent on the applicant being a registered optometrist who has successfully completed an approved program of study in ocular therapeutics or a program of study determined by the Board to be substantially equivalent or an examination or assessment in ocular therapeutics approved by the Board.

Approximately 800 of Australia's 4000-plus optometrists holding general registration have their registration endorsed for scheduled medicines.

Optometrists educated outside Australia and New Zealand are required to provide evidence that they meet Australian entry-level competencies to gain registration as an optometrist in Australia or New Zealand. To gain therapeutic endorsement to their registration, they must, if trained in therapeutics, demonstrate competence in therapeutics equivalent to that required of Australian optometrists or they must complete a course of approved training in therapeutics.

The issues

The training necessary for therapeutic endorsement has been incorporated into existing optometry courses in Australia and New Zealand so that, from 2014, all Australian and New Zealand graduates will be eligible for registration with endorsement to prescribe or supply scheduled medicines.

There are a number of important potential consequences arising from this:

- from 2014, therapeutic qualification will be the expected minimum-entry qualifications for optometrists
- from 2014, there will be two levels of practice within the profession
- if 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

Given these consequences, and to maintain clarity, consistency and equity in the registration arrangements and meet community expectations, the Board is considering the proposal that therapeutic qualification become a requirement for general registration.

Request for Comments

The Board is calling for comments from interested parties including optometrists, education providers and professional associations.

There are no specific requirements on the nature and content of submissions; however, the Board is interested particularly in responses addressing the following questions:

1. Is there any public benefit in requiring all optometrists to be eligible for therapeutic endorsement?
2. Is such a requirement a reasonable expectation of optometrists?
3. Should therapeutic qualifications be a requirement for practice as an optometrist in Australia?
4. If so, should there be a period of grace to allow all registered optometrists to gain the necessary qualifications and how long should the period be?
5. To be consistent with Australian graduates, should overseas-trained optometrists applying for general registration in Australia for the first time be required to complete appropriate competency assessments for therapeutic practice from 2014?
6. Should optometrists holding general registration practising in non-clinical roles, such as management, administration, education, research, advisory, regulatory or policy development roles, be required to hold therapeutic qualifications?
7. Are there impediments to the proposal that need to be considered and if so, can these be overcome?

Submissions

Please forward written submissions in electronic format to optomconsultation@ahpra.gov.au by close of business Friday 4 March 2011.

Please note that all submissions will be published on the Board's website after the close of the consultation process. Please indicate in your response if you do not want your submission published on the website.

For any queries relating to this matter please contact Michelle Thomas, Executive Officer for the Optometry Board of Australia on 03 8708 9068 or optomconsultation@ahpra.gov.au.