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3rd October 2011

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

optomconsultation@ahpra.gov.au

Dear Colin,

Accompanying this covering letter is a submission from the Department of Optometry at the University of Auckland in response to your consultation paper on draft registration standards for both general registration and limited registration of optometrists in Australia.

Sincerely,

Rob Jacobs

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

"Invitation for submissions on draft registration standards for both general registration and limited registration ".

Proposed registration standard from the Optometry Board of Australia

1. registration standard for initial applications for general registration – to come into effect 1 December 2014 (appendix A),

The Department of Optometry and Vision Science at the University of Auckland (DOVS at UoA) agrees that this proposed standard is appropriate.

The Department is concerned that the Board proposes to allow overseas optometrists without therapeutic training and qualifications to continue to enter Australia via the Competence in Optometry (COE) pathway until 2019.

As stated in an earlier submission, we do not see why optometrists without training in ocular therapeutics will still be permitted to enter non-therapeutic practice for such a long time and with the loss of employment opportunities for local graduates.

In 1999 the optometry registration authorities in New Zealand and Australia, through the Optometry Council of Australia and New Zealand (OCANZ), mandated that local optometry programmes introduce training in ocular therapeutics or lose their accredited status.

The re-accreditation timetable meant that the Department in Auckland was able to provide only two years of warning to students in High School who were planning to apply for optometry that the entry requirements were to change.

The Department in Melbourne was under similar pressure and would have been able to provide only a similarly short warning period to high school students in Victoria.

It seems inequitable to us that overseas optometrists will have such a disparately long period of warning that therapeutics will be required.

DOVS at UoA again strongly endorses the proposal that therapeutic qualifications become a requirement for all optometrists entering general

practice in New Zealand and Australia and is working with the NZ Board to plan the continuation from time to time of our current postgraduate courses in ocular therapeutics.

Proposed registration standard from the Optometry Board of Australia

2. registration standard on limited registration for postgraduate training or supervised practice (under section 66 of the Health Practitioner Regulation National Law Act (the National Law) as in force in each state and territory) (appendix B).

The Department of Optometry and Vision Science at the University of Auckland (DOVS at UoA) agrees that this proposed standard is appropriate.

However we see that the proposed standard does not permit an overseas expert in a specific clinical field to remain for very long in Australia in an academic teaching position that involves patient care within his/her area of specialisation.

We feel that the profession of optometry in Australia has the potential to benefit were an appropriate mechanism or pathway to be established that allowed the schools of optometry in Australia to recruit and retain academics with expert clinical specialisations from overseas.

We outlined a possible pathway in an earlier submission.

End