



Optometrists Association Australia

Submission to the Optometry Board of Australia's consultation document on Guidelines for supervision of optometrists

ABOUT OPTOMETRISTS ASSOCIATION AUSTRALIA

Optometrists Association Australia is a non-profit organisation registered under the Victorian Companies Act. It is a federation of the six state optometric associations and has been in existence since 1904.

Around 93 per cent of optometrists registered with the Optometry Board of Australia to practice optometry are members of the Association.

Contact details for the National and State Division Offices are at www.optometrists.asn.au.

Executive Summary

Thank you for the opportunity to comment on the draft *Guidelines for supervision of optometrists (the draft Guidelines)*. Optometrists Association Australia agrees that patients have the right to expect the delivery of safe, competent and contemporary optometric services at all times including when the care is being provided under supervisory arrangements and is broadly supportive of guidance developed to assist set the parameters for supervision to be agreed between the three relevant parties: the supervised optometrist, the supervisor and the Optometry Board of Australia (OBA).

The Association agrees with the central tenet that the Guidelines should set out broad principles important to effective supervision. The Guidelines should be used by both the supervising and supervised optometrists to tailor an appropriate supervision plan depending on the circumstances and the experience of the supervised optometrist to be agreed with the OBA or other relevant entity such as a panel or tribunal.

The Association is concerned to ensure that the requirements in this area are not too onerous on the optometrists involved, but do provide a sufficient level of detail to ensure that the supervision is active and effective to guide the supervised optometrist to becoming an independently practising optometrist following the period of supervision.

It is noted the application of the Guidelines is intended to be for optometrists who are:

- returning to practise after an absence greater than three years;
- making a significant change to a different field or scope of practise; and
- holding a different type of limited registration.

The Association agrees that the guidelines should inform, rather than 'cover', the supervision of students, mentoring of new graduates and the performance review responsibilities of manager as these issues potentially require different arrangements than those set out in the draft Guideline.

Our comments are general in nature, to assist in making the document as user friendly as possible.

Terminology

The phrase 'supervised optometrist' is in places substituted by the phrase 'supervisee'. It may be advisable to use one phrase only for consistency.

Specific comments on the Guidelines

Definitions

The Association notes that the definition of 'practice' is currently the subject of consultation by the OBA and suggests if as a result of the consultation the definition changes, then this ought to flow through to this document.

There may be value also in preparing a definition or providing additional guidance on the length of time an optometrist may need to practice before they can be a supervisor. This could be dealt with either in the definitions section or in the section on Responsibilities of Supervisors.

Principles

It is recommended that the OBA consider placing a timeframe on the agreement of a supervisor plan by the OBA to ensure timely agreement on these matters, under paragraph three of the Principles.

Paragraph 3 sets out that the supervisor, the supervised optometrist and the Board must agree on the frequency, duration and content of the plan. However, under *levels of supervision*, it is stated that the Board's Registration and Notification Committee will NOTE the individual supervision plan. It may be

necessary to clarify what level of agreement is required to ensure compliance is easily understood. There may be value in a flow chart being developed for the supervised optometrist to follow.

Levels of Supervision

It may be relevant to describe what the ‘level of supports’ means in paragraph 4. It would be useful to set a timeframe for ‘noting’ by the Board’s Registration and Notification Committee once a supervision plan is developed, as noted above, as well as to clarify whether ‘noting’ is required to be undertaken before the plan can be implemented and acted on.

Comment about Table one: level of supervision

In level one, supervision by telephone is not permitted. As this level requires the physical presence of the supervisor, should supervision by videoconferencing also be listed as not permitted? Should there be a requirement of the supervisor to verify examination findings since the supervisor is required to *observe* the supervisee?

In level two and three, it may be appropriate to allow supervision by videoconferencing as well as by phone.

In level two, it is not clear what the phrase “Initially for limited registration for teaching or research when clinical practice is also being undertaken” means. OAA understood that these registrants could not also undertake clinical practise at the same time and the relevant forms indicate as such. It may be relevant to more fully elaborate this point in a footnote to the Table.

In level two, the phrase ‘initially for limited registration for postgraduate training for supervised practice’ may be confusing. Does this phrase mean that all initial registrants for limited registration for postgraduate training need ‘direct supervision’ following completion of the OCANZ COE?

In level four, the phrase “The approved supervisor must oversee the supervisee’s practice” is potentially very open ended and may be hard to interpret by parties. It is suggested this be better phrased.

Specific requirements for those practising under supervision as a requirement for limited registration

The draft Guidelines set out that the supervised optometrist’s supervision plan **must** include an introduction to the Australian healthcare system and information on cultural differences. How is this practically going to be assessed? Is this to be self-directed study by the supervised optometrist or something that the supervisor optometrist can brief the supervisee on? It may be helpful for more guidance to be provided to both parties and/or consideration made to developing suitable reference material so this obligation can be fulfilled.

Reporting requirements – responsibilities of optometrists being supervised:

Under point 6, it may be useful to add in the phrase ‘as soon as practicable’ for a supervised optometrist to contact the Board if the relationship with the supervisor breaks down.

Responsibilities of supervisors

Paragraph 2 could be better phrased to use another word other than ‘intervention’ – for example, clinical care? Also, ‘others’ could be better phrased as ‘supervised optometrists’ to make it clearer who the supervisor is responsible for.

Paragraph 4 could also explain what ‘protected’ means – perhaps the use of the word ‘private’ may be clearer.

Paragraph 5 should indicate to whom the supervisor declares any interest to (assume the OBA), and add a timeframe to make such a report.

Paragraph 7, replace individual with ‘supervised optometrist’.

Paragraph 9 could add the word 'timely'.

Paragraph 10 could be improved with the addition of the words 'as soon as practicable'.

Comments on templates

Appendix A –

- Unlike the other 2 templates, there is no comment as to who is responsible for filling this document out. This would be helpful to include.
- Under orientation to the Australian Healthcare system, as noted above, is this to be self directed study and if not, how is this knowledge demonstrated? Would the OBA develop resources on its website to assist fulfilling this objective in a uniform manner?
- Under *orientation to practice* Optometrists Association Australia does not have an 'of' in its title.
- Under *Orientation to legislation and professional practice*, consider inclusion of understanding of requirements for mandatory reporting.

Appendix B –

Since the form is also to be used to seek approval to change current supervised practice arrangements, the form should also have a section to allow a supervised optometrist to seek permission to appoint a new supervisor.

Under *Principal supervisor's agreement*, under paragraph c, does the supervisor use only this notification procedure if there are doubts about the health of the supervised optometrist? If not, it would be useful to make this clear that there are continuing obligations on the supervisor to report this matter to the OBA in the manner required under the National Law.

Paragraph f, what method of notification is acceptable?

Who is responsible for sending the completed form to AHPRA? It may be useful to make this clear.

In the agreement, should the supervisor also be asked to tick a box that they understand their legal responsibilities?

Appendix C

Terminology: the use of the word 'optometrist who has entered into a supervision plan...', could be replaced with the term 'supervised optometrist'. After the end of the first sentence, add 'unless agreed by the Board' to maximise flexibility.

Potentially use the term 'Supervised Practice Plan' in the document rather than 'supervision plan' for consistency.

Under *Instructions for the approved supervisor*, add the words ;who have observed the supervised optometrist' to the sentence 'Consider input from other colleagues to ensure that a thorough and accurate assessment is made'

More fully describe the sentence 'The performance should be compared to the expected performance for the level of the position in consideration.' – perhaps through a footnote?

Under *section C. Comments and future development plans*, it would be useful to provide an indication for who needs to fill this section out – if it is both people, provide a section for both.

Under *section D. Recommendations*, who fills this section out? Who ticks the box for registrant suitable for ongoing registration? It may be useful to clarify this.

General comments

The draft Guideline seems to read that once supervision starts there is a need to progress through all levels and each has multiple reporting time points. It may be advisable to plan for sufficient flexibility to allow the supervised optometrist, in consultation with the OBA, to progress more quickly through the supervision levels or to skip certain levels where relevant, if there is demonstrated excellence by the supervised optometrist. An example of this may be someone returning to practice but who had continued to undertake CPD whilst not practising. It seems there is always the requirement to progress through all levels once a supervision plan is agreed upon initially, as per the sentence 'progress through stages will continue as described in the individual supervision unless there are concerns raised'.