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**Attention:** Mr Colin Waldron, Chair, Optometry Board of Australia

3 March 2011

Dear Colin

Thank you for requesting written submissions on the proposal by the Optometry Board of Australia (OBA) that therapeutic qualification become a requirement for general registration. The Optometry Council of Australia and New Zealand (OCANZ) is taking this opportunity to outline the relevant issues for overseas trained optometrists.

#### The current arrangement for overseas trained optometrists

Currently, to apply for registration with the OBA or the Board in New Zealand, all overseas trained optometrists must successfully complete the Competency in Optometry Examination.

In general, to be eligible to sit the examination, applicants must provide evidence of successful completion of a course in optometry of at least 3 years full-time study followed by one year (at least 400 hours) of supervised clinical practice. At present the Competency in Optometry Examination is administered twice yearly to approximately 30 to 40 new candidates each year. Of these candidates, approximately 2 each year have undertaken therapeutic training overseas (in Canada and the USA).

The examination involves both a written examination and a clinical examination. The written examination consists of two papers. A three-hour multiple choice question paper (covering basic biomedical, vision and optical science and clinical science) and a three-hour short answer paper (covering diagnosis and management). The clinical examination is also divided into two parts - a skills station examination and patient examinations in which four patients are examined by each candidate.

The components of the Competency in Optometry Examinations assess the competence of the candidate in the entry-level competencies listed in Optometrists Association Australia Universal (Entry-level) and Therapeutic Competency Standards for Optometry 2008. This document covers the skills, knowledge and attributes of an entry-level optometrist in Australia and New Zealand as well as the therapeutic competencies that are required for ocular therapeutic endorsement. Only those competencies listed as entry-level (not therapeutic competencies) are assessed in the Examination.

For candidates that also have eligible overseas therapeutic training, there is now a process they can undertake after successfully completing the Competency in Optometry Examination to gain registration with ocular therapeutic endorsement in Australia and New Zealand. The Assessment of Competence in Ocular Therapeutics (ACOT) process consists of three case reports and an oral examination. No candidate has yet undertaken the ACOT; however, one candidate has recently been assessed as eligible to undertake the process.

### Issues for overseas trained optometrists

There is currently at least a 6 year potential lag between granting eligibility to sit the Competency in Optometry examination and successfully completing it. OCANZ allows candidates to sit the written examinations within three years of eligibility being advised and candidates are then permitted to an unlimited number of re-sits of the written examinations. Candidates must pass the clinical examinations within three years of passing the written examinations. Therefore, any changes to the system (or eligibility requirements) need to be made with this in mind.

The current ACOT examination requires that candidates must demonstrate safe and competent use of ophthalmic therapeutic agents for a primary practice setting in the Australian or New Zealand context. Therefore, it is designed to be undertaken by a candidate after they have been practising as an Optometrist in Australia or New Zealand.

If new written and clinical examination pathways are to be developed to assess therapeutically qualified overseas trained optometrists, the OCANZ examination would have to be completely altered to incorporate the assessment and patient management of Australian and New Zealand therapeutic cases. This would be an extremely costly examination to run (especially given the relatively small number of eligible candidates).

### Proposal

OCANZ has one suggestion that could be investigated. It involves the current two stage examination structure and format – Competency in Optometry Examination and the ACOT Examination.

- Candidates with eligible overseas therapeutic training could first successfully complete the Competency in Optometry Examination. The OBA (and NZ Board) would then provide these optometrists with a form of registration (to be decided by the Boards) and they would be expected to successfully complete the ACOT examination within a period of time (approx 6-12 months). If they do not achieve this, their registration would be suspended.
- Candidates without eligible overseas therapeutic training could first successfully complete the Competency in Optometry Examination. The OBA (and NZ Board) would then provide these optometrists with a form of registration (to be decided by the Board) and they would have the opportunity of undertaking an OCANZ approved postgraduate therapeutics course in Australia or New Zealand. They would have a period of time in which to complete this training before their registration is suspended.

Thank you again for the opportunity to comment on the consultation document. Please don't hesitate to contact me if you have any questions or require further clarification.

Yours sincerely



Tamara McKenzie  
Executive Officer