



Optometrists Association Australia

Submission to the Optometry Board of Australia's draft amendment to Continuing professional development registration standard and Guidelines on continuing professional development for endorsed and non-endorsed 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.

Submission

Thank you for the opportunity to comment on the Optometry Board of Australia's (OBA) draft amendment to the *Continuing professional development registration standard* and *Guidelines on continuing professional development for endorsed and non-endorsed optometrists*.

The Association represents over 3800 members being 93% of optometrists registered with the Optometry Board of Australia to practice Optometry. As the peak professional body for Australian optometrists the Association is committed to assisting optometrists to provide high quality eye health and vision care for all Australians and to assist them in achieving their aspirations for themselves, their communities and the profession.

The National Office of Optometrists Association Australia provides limited professional development for State Division members, while the Association's State Divisions provide practising optometrists with a variety of professional development activities in order to fulfil registration requirements. This sits alongside numerous private providers of professional development to practising optometrists.

In line with the commitment to assist optometrists to provide high quality health and vision, the Association recognises continuing professional development (CPD) is essential for optometrists in maintaining their competence and continuing to develop the qualities required to deliver the quality of care that the community expects.

This submission supports continuing professional development that is accessible, of high quality, meets the demands of the profession and assists in the delivery of safe, evidence-based, competent eye health and vision care for the community. The proposed amendments to both the registration standard and guidelines reflect these ideals and incorporate significant feedback from the profession provided through the Association's participation on the OBA's CPD committee.

Optometrists Association Australia agrees with the OBA statement that the proposed amendments are unlikely to create any increased difficulty for practitioners in meeting the continuing professional development requirements.

Rather, the amendments to the guidelines reflect a program that allows increased flexibility in the types of learning activities that can be used to meet the professional development requirements. The increased clarification to the guidelines will also assist practitioners in understanding their individual professional development requirements.

In the absence of a universal health professional 'best practice' model of professional development, Optometrists Association Australia supports the blended approach as proposed in the draft registration standard. It is the experience of the Association that optometrists appreciate meeting their professional development requirements utilising a range of activities, from educational evenings and webinars to conferences and postgraduate study. The proposed framework allows such flexibility.

The minimum requirements for face to face learning are not demanding and in the Association's State Division experience, easily able to be met through a combination of state division delivered professional development or other privately available professional development activities, encourage practitioner interaction and foster practitioners taking a critical and interactive approach to their professional development. In conjunction with the proposed simpler educational framework this provides a well-balanced learning structure in which practitioners can undertake professional development.

The key advantage of this blended approach is to provide structure while ensuring practitioners maintain significant self-direction and control over their professional development learning needs. While the individual learning needs of practitioners do differ, the reduction in the number of activity groups, the inclusion of live learning elements as face to face activities and the overall structure of the framework allow this self-direction and control.

The inclusion of peer to peer learning and interactive webinars specifically provides those practitioners who currently face difficulties in accessing professional development greater flexibility in meeting the criteria. These amendments will be of particular benefit to rural and remote practitioners and are in tune with use of new technology by CPD providers.

Estimates suggest there will be approximately another 2,000 therapeutically qualified optometrists with prescribing rights by 2020. There is significant public benefit in optometrists being able to prescribe and use ocular therapeutic agents to treat common ocular conditions without the need for referral to a GP or ophthalmologist.

The proposed standard states that practitioners who hold a scheduled medicines endorsement under section 94 of the National Law must accumulate at least 40 of the 80 point professional development requirement in education related to the endorsement. This is consistent with the previous standard but takes into account the ability to accumulate points over a 2 year period.

While there has been some discussion on the merits of this requirement since the introduction of the National Scheme, this submission agrees with the premise. Non-medical prescribing has recently become a topical issue. Optometrists Association Australia reasons current, evidence based knowledge is essential for safe and effective prescribing. Furthermore, the addition to the guidelines of further clarification on the definition of education that is 'relevant to scheduled medicines endorsement' does not make the requirement onerous.

Specifically the addition of patient assessment and differential diagnosis as stages of therapeutic medicine management provide clarity to practitioners and significantly broadens the availability of professional development activities that meet the requirement. Both patient assessment and differential diagnosis form the basis of clinical decision making and is built into both undergraduate and post graduate training for therapeutic prescribing. As the profession expands its scope and assumes increasing responsibility in primary eye care, evidence based clinical decision making is critical. This is particularly so in areas such as ocular therapeutics where current best practice is constantly evolving.

Optometrists Association Australia would like to make the following comments on each of the key changes as detailed in the consultation document:

Incorporation of a two-year rollover for professional development requirements

Optometrists Association Australia agrees with the amendments to the registration standard and guidelines that allow optometrists the flexibility to meet the requirements by accumulating CPD points over two registration periods. These changes reflect feedback from the profession and we are very pleased that this proposal is contained in the revised draft registration standard.

Remove the exemption for new graduates

Optometrists Association Australia supports the proposed changes to the registration standard and guidelines of having new graduate optometrists meet the same CPD requirement as their peers.

While acknowledging the additional demands on new graduates in the profession Optometrists Association Australia believes the educational framework has the flexibility of choice that will assist new graduate optometrists identify individual learning needs and areas that require consolidation and extra attention specific to their scope of practise.

While new graduates have much to adjust to as they enter the workforce, it is in the best interests of both the profession and the public that we encourage new graduates to regard regular CPD as part of their professional lives from the moment they start full time practice in the profession. It is our State Division's experience that new graduates are engaged with CPD following their graduation.

Simplification of activity types to increase clarity and understanding for optometrists

Optometrists Association Australia recognises and supports the following amendments to the educational framework and associated activity types in the draft amendment;

- Clear differentiation between accredited and non-accredited activities and the associated responsibilities of optometrists in meeting their requirements;
- Simplification of the educational framework that allows new technologies and learning types to enter the educational framework going forward;
- Addition of real time, group based elements such as webinars, peer to peer learning and journal clubs that have peer interaction at their core.

Overall, the proposed amendments to the activity types and removal of existing duplication across the registration standard and guidelines appear clear and consistent. The proposed framework should not only enhance flexibility in meeting professional development requirements but also provide clear guidance and reduce confusion on accredited versus non-accredited activities, the different activity types accepted and points weighting for optometrists.

Incorporate amendments into the guidelines previously considered by the Board in the development of the CPD FAQs or CPD provider manual

Optometrists Association Australia agrees proposed amendments reflect feedback from the profession since the introduction of the National Scheme.

Review of the classification of activity types to ensure emerging technologies can be incorporated into the accreditation process without revising the standard or guidelines

Optometrists Association Australia agrees the introduction of learning elements into the educational framework will allow simple inclusion of new learning technologies in future without the need for significant changes to the registration standard and guidelines.

The introduction of case review and peer to peer learning reflects the value of these learning methods as an efficient tool for educators and practitioners to use in promoting professional development. The information gathered and learning outcomes from such peer learning activities can be used by practitioners to assist the development of self-directed professional development learning plans. Furthermore, peer learning provides a form of feedback that can be used to identify clinical learning needs that align with the goal of increasing safety and quality of eye care for the community.

Remove the national office of the Optometrists Association Australia from the approved provider list, indicating that activities provided by this office will be accredited by the CPDAC.

Optometrists Association Australia supports amendments to the guidelines that remove the national office of Optometrists Association Australia from the list of approved providers in the interests of the integrity and independence of the accreditation process.

Optometrists Association Australia would like to make the following specific comments on the consultation document:

Proposed amendments to assessment of CPD activities

While the Association fully supports the intent of the OBA to turn what has traditionally been a test of knowledge and listening skills into an activity that actively facilitates a review of the learning undertaken, the Association feels the pass/fail criteria should be maintained. Keeping the pass/fail criteria in addition to further emphasis on the need for learning review will act as a reminder to education providers that the process needs to be carefully planned and executed to ensure that the achievement of learning objectives are the primary focus and that feedback is given to participants.

Logos provided to CPD providers

The Association supports the intent to transfer the responsibility of CPD from providers to the optometrist. To help practitioners identify which professional development activities best meet their identified learning needs and the requirements of the OBA, Optometrists Association Australia suggest that in addition to issuing providers the logo that specifies points, providers can also access logos that they must use to indicate which activities count towards “therapeutic points”, “face-to-face”, “clinical” and “manufacturer/supplier” in promotional materials.