



25 October 2012

Mr Colin Waldron
 Chair, Optometry Board of Australia
 c/o: Email optomconsultation@ahpra.gov.au

Dear Colin

Optometrists Association Australia response to the Optometry Board of Australia's Draft Registration standard for limited registration for teaching or research

Optometrists Association Australia (OAA) welcomes the opportunity to respond to the Optometry Board of Australia's (OBA's) consultation regarding the Draft *Registration standard for limited registration for teaching or research* (the Draft Standard). OAA is the peak professional body for Australian optometrists, representing over 4,000 members (close to 95% of optometrists registered with the Optometry Board of Australia.)

We recognise the Draft Standard is intended to provide an avenue for overseas trained optometrists to secure limited registration to fill teaching or research positions where registration is required.

We note the OBA's intent in the development of the Draft Standard is, as detailed in the OBA's statement of assessment against AHPRA's procedures for development of registration standards, to provide registration standards that strike a balance between protecting the public and supporting the ongoing development of a flexible, responsible and sustainable workforce. In many respects the Association believes that the Draft Statement supports the achievement of an appropriate balance. However, we also believe that crucial to ensuring a responsible and sustainable workforce, is ensuring that the workforce is well educated and appropriately trained. We believe that the addition of further registration requirements and definitional clarifications to the Draft Statement is necessary to ensure that the standards for limited registration for teaching or research do not negatively impact the quality of research or teaching and, through these vectors, public safety.

Scope of application

We note that the standard is intended to apply only to those teaching and research contexts in which registration is currently required, and that release of the Standard will not imply a change to circumstances in which registration as an optometrist is required. OAA recommends that this is clearly communicated to relevant parties alongside the release of the Standard once finalised to limit any confusion. We further recommend that the OBA consult with stakeholders before any change is made to the listings of when it is necessary to be registered as an optometrist.

To aid clarity, we further suggest that the OBA provide clear examples of circumstances in which this registration standard will apply.

Requirements

OAA believes that all the requirements for limited registration for teaching and research are appropriate. We believe that all of these requirements should be considered necessary to the awarding of limited registration for teaching or research and advise against any lessening of these requirements. Maintaining sufficiently rigorous requirements is necessary to protect the interests of the public, including research subjects and through the assurance of sufficiently high quality research and education of current or future health practitioners, and to preserve the public's trust in, and esteem of, health practitioner registration.

Whilst supporting all the requirements outlined in the Draft Statement, the Association has concerns that the requirements alone are not sufficient assurance of appropriate practice in the course of research or of sufficiently high quality teaching. The requirements as they currently stand place much of the onus on the OBA to determine, on the basis of scrutiny of the position description for the research or teaching role, whether or not limited registration is appropriate and sufficient for the role and will not in any way negatively impact public wellbeing or safety. This is a decision with potentially significant impact on the quality of optometry research and the quality of education received by optometry students as well as certainty for applicants for teaching and research positions. These can have flow-on effects to the quality of care received by patients and the ability of a research institution to plan for their workforce needs. Given the significance of these determinations, OAA recommends further guidance is offered through the Registration Standard to provide greater transparency in this area and provide some factual information to applicants. In particular we recommend that in the interests of public safety, the Draft Statement is amended to note that:

- in no instances will a position description be approved by the OBA if the Board believes it is likely to require clinical practice outside of any supervised practice arrangements that may be agreed. (The Association believes that this should be accompanied, as discussed below, by a clearer stipulation that limited registration does not permit any clinical practice to be undertaken outside of supervision arrangements that comply with established OBA supervision guidelines);
- in no instances will a position description be approved by the OBA if the Board believes it is likely to require teaching students clinical procedures or techniques that the applicant for registration would not be reasonably expected to be fully competent to undertake using in accordance with accepted standards for best-practice in Australia. We believe this amendment is critical to help ensure that students receive instruction with regard to clinical procedures and techniques that complies with accepted best practice in Australia and which is up-to-date with Australian practice;
- that the OBA must be appraised of the arrangements for supervising the registrant in their role (outside of clinical practice – see notes below regarding requirements for supervision of clinical practice) and be confident that these are sufficient. This has particular pertinence to teaching roles, where supervisory arrangements of the practitioner applying for limited registration, should be established to ensure that education reflects established optometric knowledge in Australia.

We also suggest that one of the requirements for registration under this Standard requires further clarification. Requirements as drafted include “a qualification that provides eligibility to sit the Competence in Optometry Examination conducted by the Optometry Council of Australia and New Zealand (OCANZ).’ However, there are avenues for people with qualifications that do not generally grant such eligibility to pay OCANZ to have their qualification assessed for equivalence and eligibility to sit the exam. It is not clear in the current Draft Standard whether OBA will grant eligibility in these cases as well.

Length of registration period and ability to renew limited registration

The Association notes that the recommended length of registration under this Standard (12 months, with a potential for renewal a maximum of three times before a new application is required) complies with the National Law. We support these recommended timeframes as providing an appropriate balance between efficiency in administrative processes and ensuring that professional and practice developments have not altered the sufficiency of limited registration to the research or teaching role in question. However, we recommend the OBA also consider preserving the right to offer a shorter registration under this standard to support short term research and teaching roles that may be undertaken by overseas-trained optometrists.

Purpose of registration

OAA supports the notion that registration is only provided for practice within the terms notated on the Register of Optometrists and that this will accord with an approved position description for the role in question.

This section clearly outlines that this form of registration does not allow the registrant to undertake ‘private practice.’ However, it does not clearly stipulate that whilst the registrant *may* be permitted to undertake clinical practice (for example in the course of undertaking research), this will only be permitted under supervision and in accordance with the OBA’s *Supervision Guidelines for Optometrists*. Whilst this is intimated elsewhere in the Draft Standard, it is not clearly stated anywhere in the document. This is a significant point, as the Association believes that it is in the public’s interest to ensure that clinical practice is not undertaken without supervision by anyone other than a fully registered optometrist. OAA strongly recommends that for the sake of clarity this is clearly articulated in the document, and most appropriately in the ‘Purpose of registration’ section.

Definitions and interpretations

OAA notes that there are a number of terms used in the Draft Standard that don’t have a clear and unambiguous meaning and that may be open to multiple interpretations by the Board or potential applicants; or assumes the reading of other registration standards (as is the case in relation to the definition of practice).

The term ‘private practice’ is used throughout the document, noting that those with limited registration for teaching or research are not permitted to undertake private practice. However, this term is not defined. It is unclear whether, for example, services provided as an employee of a community health or hospital service would be considered ‘private practice.’ Whilst noting that the Draft Standard also stipulates that practice outside an approved position description is not permitted, we recommend that further clarity of what constitutes private practice is given through a

definition of 'private practice.' As noted above, we also recommend that further clarity regarding the purpose and scope of the limited registration be given, through a clear articulation under the 'Purpose of registration' section that whilst an approved position description may include some supervised practice, no registrant under this standard will be permitted to provide clinical services to a patient outside of agreed supervision arrangements.

The terms 'teaching' and 'research' are also not given definition within the document. To provide guidance to the OBA and limit the potential for future ambiguity about the meaning of these terms (for example, whether or not they apply only to those employed by recognised education and research bodies), the Association recommends that they are clearly defined within the Draft Statement.

The Association also notes that the introduction of this new category of limited registration may impact on the accreditation of university optometry courses where the registrants in question may be involved in teaching. We recommend that the OBA work with the Optometry Council of Australia and New Zealand (OCANZ) and the university sector, if they are not already doing so, to ensure that the full implications of this Draft Standard on the accreditation of undergraduate optometry courses are considered, prior to finalisation of the Standard.

Yours sincerely,

Genevieve Quilty
Chief Executive Officer