



Consumers
Health Forum
of Australia

4 February 2013

Mr Colin Waldron
Chair
Optometry Board of Australia
GPO Box 9958
MELBOURNE VIC 3001

Dear Mr Waldron.

Public Consultation on Amendments to Guidelines for use of Scheduled Medicines

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide input to the Optometry Board of Australia's (OBA) *Public Consultation on Amendments to Guidelines for use of Scheduled Medicines* (the Guidelines).

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

Due to factors such as an increasing demand for healthcare, equity of access and workforce shortages in Australia, it is important that the roles of health professionals be expanded, where appropriate, to address service equity gaps to meet demand, such as in prescribing.

Prescribing by optometrists and a wide range of other health professionals is already occurring in Australia. CHF believes prescribing should be safe, efficacious and have mechanisms in place for quality assurance and review to ensure adequate standards of prescribing competence are maintained, for the benefit of the consumer. CHF also emphasises the importance health professionals practicing Quality Use of Medicines (QUM), a pillar of Australia's National Medicines Policy (NMP), when developing treatment options for a consumer.

CHF welcomes the inclusion of section 2.1 of the Guidelines, which addresses the importance of QUM in prescribing behaviour by optometrists, as well as the three-yearly periodic review mechanism established in the Guidelines, which will allow the OBA to assess how effectively the Guidelines are working.

Overall, CHF also supports the Guidelines as they provide an adequate level of detail, including on key prescribing elements such as education and training, practice procedures, and registration, which will assist optometrists in their medication-prescribing role.

However, the emphasis on informed consent and ensuring the consumer understands the treatment options relating to a medicine should be strengthened in the Guidelines. In its current state the Guidelines promote the importance of the optometrist being aware of the impact of prescribing the medicine for the consumer, but does not explicitly suggest that the consumer should be, or how the optometrist plans to make them, aware of those factors. This section of the Guidelines should highlight the importance of engaging in a dialogue with the consumer about the treatment options.

Prescribing Competencies Framework

A good example of this consumer-focussed approach, which we believe the OBA may have contributed to the development of and which should be considered in finalising the Guidelines, can be seen in the NPS *MedicineWise* (NPS) Prescribing Competencies Framework (the Framework),

The Framework aims to contribute to achieving the QUM objective of the NMP by describing the competencies and skills required to prescribe medicines in Australia. Developed in 2012, and based on the World Health Organisation's *Guide to Good Prescribing*, the Framework describes the acceptable standards of knowledge, skills and behaviours required from health practitioners to prescribe medicines in Australia. The Framework, while not a curriculum, provides a useful guide for those wishing to revise or develop sound prescribing practices, grouped under seven competencies relating to general and professional competencies specific to prescribing

Health Professionals Prescribing Pathway Project

In addition to the NPS Framework, OBA may also like to consider how the work currently being done by Health Workforce Australia, as part of its *Health Professionals Prescribing Pathway* (HPPP) Project, could contribute to, and affect, the Guidelines.

CHF is funded by Health Workforce Australia (HWA) to undertake consumer consultations on selected aspects of their work program. One of these consultations focussed on the development a nationally consistent approach to prescribing by health professionals, the HPPP Project, which occurred in August 2012. CHF's input into this work resulted in a number of recommendations, including a number of principles that should underpin, and would benefit, a national approach to health professionals prescribing, and which should be considered in revising the Guidelines.

Both the NPS Framework and the HPPP Project document can be found online on the NPS and HWA website, www.nps.org.au and www.hwa.gov.au, respectively.

CHF appreciates the opportunity to provide a submission to *Consultation on Amendments to Guidelines for use of Scheduled Medicines*. If you would like to discuss the issues raised in this submission in more detail, please contact CHF Project and Communications Officer, Carlo Malaca, on 02 6273 5444, or at c.malaca@chf.org.au.

Yours sincerely,



Carol Bennett
CHIEF EXECUTIVE OFFICER