

16 November 2022

Susan Kelly
Optometry Council of Australia and New Zealand
PO Box 16179
Collins Street West
Victoria 8007 Australia

Via email: ceo@ocanz.org

Dear Susan

Response to consultation on the review of the Accreditation standards for programs of study in ocular therapeutics

Thank you for the opportunity to comment on the review of the Accreditation standards for programs of study in ocular therapeutics (the accreditation standards). The Optometry Board of Australia (the Board) considered the draft accreditation standards at its Board meeting held on 27 October 2022.

The Board was pleased to see that much of the feedback provided in our letter of 3 August 2022 in response to the request for early comment has already been incorporated in the consultation draft of the accreditation standards for ocular therapeutics.

In response to your request for comment and the discussion questions at section eight of the consultation paper, the Board has provided the following feedback.

1. The Board supports the retention of the basic form of the current OCANZ Standards, which is clear and easily to interpret by its audience.
2. The Board strongly supports the elevation of cultural safety of for Aboriginal and Torres Strait Islander Peoples to its own domain in the accreditation standards, which is consistent with the revised entry level standards, and the National Scheme's objectives in the [Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025](#) and [Statement of Intent](#).
3. The accreditation standards are written in a way that does not appear to limit emerging practises. They emphasize life-long learning, professional development and interaction with research.
4. The Board is broadly satisfied that the accreditation standards strike an appropriate balance between current and emerging practices, however the need for optometrists to take a whole of body approach to prescribing of scheduled medicines could be strengthened.
5. Other possible changes identified by the Board include:
 - 5.1. better incorporation of self-reflection into standard 4, Criteria 4.9
 - 5.2. additional information on record keeping could be included
 - 5.3. the link to the NPS standards in the accreditation standards needs to be corrected
 - 5.4. OCANZ could consider adding to page 18 of the accreditation standards 'with particular regard to staying abreast of innovations in therapeutics practice and maintenance of capabilities with evolution of therapeutic practice.'
 - 5.5. the glossary of terms is very helpful and clear, and
 - 5.6. inclusion of emphasis on recognition of scope of practice and referral to other practitioners such as GPs.

If you would like to discuss any aspect of the Board's feedback, please feel free to contact Lynda Pham, Executive Officer, Optometry at EO.Optometry@ahpra.gov.au.

Optometry Board of Australia
Australian Health Practitioner Regulation Agency
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Yours sincerely

A handwritten signature in black ink that reads "Judith Hannan." The signature is written in a cursive style with a large, looping initial 'J'.

Judith Hannan

Chair, Optometry Board of Australia