



22 July 2021

Ms Susan Kelly
Accreditation Manager
Optometry Council of Australia and New Zealand
By email: s.kelly@ocanz.org

Re: OCANZ Accreditation Standards Review

Dear Ms Kelly

The QUT Faculty of Health and the School of Optometry and Vision Science (OVS) note the project overview as described in section 1.2 of the document. We appreciate the opportunity to be part of the Accreditation Standards Review and comment on the current Standards.

We agree that the current standards have well satisfied the requirements and purpose, that only incremental changes are required, and that this is a sensible and credible approach. If additional or modified criteria are suggested, we would like to ask that examples of suitable evidence are provided.

Our response to the 10 discussion questions follows:

1. Do you support retention of the basic form of the current OCANZ Standards (i.e., domain headings, an overarching standard statement for each domain, collective non-instrumental criteria and an integrated evidence guide)? If not, what would you change and why?

QUT Faculty of Health and the School of Optometry and Vision Science supports the basic form of the current Standards. The format is clear, useful, and familiar.

2. Do you support the elevation of cultural safety related to First Nations Peoples (Aboriginal and Torres Strait Islanders and Māori) and their health care as a separate domain in the revised standards (akin to the ADC's 'Cultural Safety' domain)?

QUT Faculty of Health and the School of Optometry and Vision Science strongly supports the elevation of cultural safety related to First Nations People and their health care as a separate domain in the revised standards to appropriately recognise the fundamental importance of human rights in healthcare.

3. Do the current OCANZ Standards give sufficient emphasis to new and emerging practice technology and the related challenges that students and new graduates may face?

QUT Faculty of Health and the School of Optometry and Vision Science considers that the current Standards give sufficient emphasis to new and emerging technology and related challenges in the section on guidance to Standard 2.

4. Do the current OCANZ Standards give sufficient emphasis to potential innovations in practice and corresponding graduate capacities for adaptation and professional development?

QUT Faculty of Health and the School of Optometry and Vision Science encourage further emphasis on changes in practices and the corresponding need for adaptation and professional development. Although this is mentioned at 2.4 this could be expanded upon. Currently technology and presumably the need for adaptability in professional development are wrapped into one criterion.



5. Do the current OCANZ Standards accommodate emerging trends in education methods (e.g., on-line learning, simulation) and changes to the health system (telehealth, record systems)?

QUT Faculty of Health and the School of Optometry and Vision Science suggest that the wording on 'Learning and teaching approaches' in the guidance on Standard 3 could be reviewed to better and more broadly reflect emerging trends in education methods. However, the current Standards give sufficient emphasis to changes to the health system in the section on guidance to Standard 2.

6. Has the recent COVID experience revealed aspects of risk management or related matters that might usefully rate a mention in the OCANZ Standards?

The COVID experience has been unprecedented, and the risks mostly related to clinical placements and some forms of assessment. Some mention of business continuity plans/committees and reasonable flexibility in managing programs during major disasters or similar unforeseen circumstances might be warranted.

7. In reference to Appendix 2, do the differences among criteria suggest to you any worthwhile additions or changes to the current OCANZ Standards?

In standard 1, consider making explicit the need to familiarise oneself with changes in legal, ethical and professional requirements.

8. Does the OCANZ Evidence Guidance contain omissions, irrelevancies, ambiguities, obsolete items, confusing content or misleading items?

QUT Faculty of Health and the School of Optometry and Vision Science considers evidence guidance to be relevant and clear. Some review of the relevance of samples of records of patient consent to student care is warranted given that such consent in optometry is typically verbal and not recorded (in Standard 1).

9. Are the 15 pieces of core evidence outlined in the Standards (page 4-5) still appropriate?

QUT Faculty of Health and the School of Optometry and Vision Science considers that the 15 pieces of core evidence are still appropriate. However, further consideration should be given to the appropriateness of the patient presentations in the Table on p.12.

10. Are there any other issues you wish to have considered?

There are no further issues QUT Faculty of Health and the School of Optometry and Vision Science wish to have considered.

Yours sincerely

A handwritten signature in cursive script that reads 'Patsy Yates'.

Distinguished Professor Patsy Yates, AM
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