

# COUNCIL OF OPTOMETRY REGISTRATION AUTHORITIES Inc.

Incorporation No. A0049268P  
ABN 13758851575

Secretariat Office: 15 Hillandale Road, Warragul, Victoria 3820  
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The Practitioner Regulation Subcommittee  
Health Workforce Principal Committee  
Australian Health Ministers' Advisory Council  
Level 12/120 Spencer St  
Melbourne VIC 3000

3<sup>rd</sup> September 2008

Dear Ms Nardi

I would like to present the **Council of Optometry Registration Authorities (CORA)** response to the *Consultation Paper on Issues Supplementary to the Intergovernmental Agreement on a National Registration and Accreditation Scheme for the health professions to be included in the first bill* dated 13 August 2008.

As requested by the Practitioner Regulation Subcommittee of the Health Workforce Principal Committee, specific responses to matters highlighted in the Paper are included as well as our views in respect of other aspects.

The IGA at Section 13 page 7 provides for changes to the IGA where Ministers can be persuaded they are justified. The ideal time to raise such changes is now while the enabling legislation is being drafted.

## **Section 1.1 Objects or purposes**

CORA supports the objectives and principles described in 5.3 and 5.4.

## **Section 2 Australian Health Workforce Ministerial Council**

CORA recommends that the Ministerial Council gives final approval of 'registration and accreditation standards based on the advice and recommendations of the National Boards.'

The IGA provides for the creation of profession specific national boards. For each profession, the boards:

- will oversee development of standards for registration and accreditation
- will oversee registration and accreditation functions, including individual registration and accreditation decisions
- will decide on committees needed to perform these functions
- may delegate powers to State and Territory committees, and
- can provide policy advice to Ministers.

**President**  
**Mr Garry Fitzpatrick**

**Executive Officer**  
**Mr Geoff Leunig**

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Therefore the ministerial Council should rely on the function of the National Boards in giving their final approval. The inclusion of the wording "based on the advice and recommendations of the National Boards" will remove the ambiguity that currently exists

## **Section 3 Australian Health Workforce Advisory Council**

CORA believes National Boards should be able to comment on advice from the Advisory Council prior to consideration and decision by the Ministerial Council. This will enable the committee of Ministers to be fully informed as it will be harder to change decisions once they have been made.

If the advice from Boards is to be considered fully on its merits it should be provided at the same time as advice from other sources.

## **Section 4 National Agency**

CORA objects to the Agency having any role in setting fees or rules for developing professional standards.

### **Fees:**

Board members will be statutory office holders accountable to the Ministerial Council for the delivery of NRA within their professions. This should include clear and unambiguous control over the resources which they need to perform their duties. There is no need for the National Agency to be involved in setting fees. The National agency has a role in reviewing the fees and if the National Agency has concerns with the relevant Boards budgets and fees, it will have the ability to discuss with the National Board. If still not satisfied they can object to the Ministerial Council. Requiring the Agency and Boards to agree on fees blurs lines of responsibility.

**Standards**, as a matter of principle there should be no involvement of the National Agency in professional standards. The proposal is for the Agency to set the business rules not get involved in content. This should be clarified to ensure that the National Agency does not exhibit 'function creep' over time and the only way to ensure no involvement in professional standards is for specific clarification to stop the blurring of responsibility. Again, if the Agency feels any profession is not doing what it should, it can object to the relevant Board and/or Ministers.

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CORA does not support 4.10 financial provisions in respect of ongoing costs of the Agency being met from fees paid by health professionals. The Agency is additional to current arrangements and imposed by governments on all. Professional fees should support only those operations of Boards and their committees ie those things for which Boards are accountable. Governments should support the ongoing costs the National Agency that are over and above the provision of shared services.

CORA believes fees should be set by Boards alone. All fees raised by the National Boards should be for the use by those boards.

## **Section 5 National Boards**

CORA proposes that the Accreditation committee or bodies are appointed based on the advice and recommendations of the national boards and that such committee receives funds through the National Boards budget and reports to the National Boards and not through the National Agency.

CORA proposes the following words to be added: based on the advice and recommendations of the National Boards"

### **5.11 Responsibility for developing accreditation standards (accreditation committee or bodies)**

In relation to the development of accreditation standards, the IGA implies that the National Boards will not develop the standards, but will ensure that this development occurs. It is proposed that the legislation clarify this point by stating that the accreditation standards will be developed by any accreditation body or committee assigned by Ministerial Council to perform the accreditation functions. Based on the advice and recommendations of the National Boards"

Yours sincerely



Garry Fitzpatrick  
President  
Council of Optometry Registration Authorities

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