

NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR THE HEALTH PROFESSIONS

Proposed arrangements for accreditation

Submission from Optometrists and Dispensing Opticians Board (NZ)

December 2008

Introduction

Under New Zealand legislation (the Health Practitioners Competence Assurance Act 2003 (HPCA)) the Optometrists and Dispensing Opticians Board of New Zealand (the Board) is the responsible authority in New Zealand for the registration and competence assurance of optometrists and dispensing opticians. Under section 158 of the HPCA the Trans Tasman Mutual Recognition Act 1997 (TTMR) prevails over the HPCA. In practice this means that the Board is required to register any optometrist or dispensing optician registered in Australia. The Board therefore has an interest in ensuring that the provisions for accrediting courses prescribed as qualifications required for scopes of practice for optometrists in the proposed legislation are at least equivalent to New Zealand requirements.

Currently the Board is a member of OCANZ (Optometry Council of Australia and New Zealand). One of the objects of OCANZ is to accredit Australian and New Zealand optometry schools and the courses/programs conducted by those schools leading to eligibility for registration as an optometrist in Australia and New Zealand. Another is to assess for admission to practice in Australia (and New Zealand) overseas trained optometrists. In view of TTMR the Board uses OCANZ to assess applicants not trained in NZ or Australia for registration in the scopes of practice of optometrist and optometrist (TPA endorsement).

Our submissions follow. We have only provided comment on those sections that we consider may have an impact on our obligations, or where we believe the particular relationship with NZ under TTMR may need to be taken into account in the legislation.

Intergovernmental Agreement

TTMR

The Board notes that although section 5 of the Proposed Arrangements for Accreditation consultation paper includes comment on the relationship with NZ under TTMR, the IGA does not. The Board therefore suggests that when consideration of any matter relating to accreditation is being undertaken (whether transitional or in the future) the mutual relationship with NZ (under TTMR) regarding registration of optometrists and accreditation of courses be considered and the Board be consulted accordingly.

For example 1.35 (a) to (e)

(a) In assessing courses of study and determining whether they meet the approved standards, the accreditation body must be aware of the "equivalence" agreements of TTMR

(The Board does note provision is made under section 1.6 Principles (f) and commented on in section 3.1 paragraph 9 of the consultation paper)

3.4 Scope of Accreditation

Under the current arrangement and in view of the requirements of TTMR, the accrediting body (OCANZ) includes in its membership the following classes:

- Accredited schools (which includes Department of Vision Science, the University of Auckland)
- CORA (which includes the Optometrists & Dispensing Opticians Board (NZ))
- NZAO (New Zealand Association of Optometrists)

In view of the obligations of TTMR for both Australian and NZ optometry regulatory bodies, any standards of accreditation of optometry training or qualification assessment set in one country has implications for the other country. The Board suggests that for these reasons, there continue to be allowance for similar (or equivalent) classes of membership on any future accreditation body.

Proposal 3.4.7

The Board concurs with this proposal. However the Board wishes to ensure that AHMAC is aware that the Board does not intend to delegate responsibility of its own accrediting and qualification functions to an Australian body or to a body with no membership from NZ.

3.5 Governance Arrangements

Appointment of any community representatives should be on the basis that they possess relevant qualifications and experience enabling them to contribute effectively to the process (and with an appreciation of the ramifications of TTMR).

5 International Linkages

Proposal 5.1

The Board agrees with this proposal in relation to the relationship with NZ under TTMR and furthermore that in view of the deemed equivalence of the optometry profession in the two countries that NZ (the Board) is included and consulted with in respect of the assessment of overseas optometrists with qualifications which are not recognised in NZ.

Final comments

Thank you for the opportunity to comment on this consultation paper. Please direct any queries about the content of this submission to the Board's Registrar, Rachael Thorn, at rachael.thorn@oanddoboard.org.nz.