

**NATIONAL REGISTRATION AND ACCREDITATION SCHEME
FOR HEALTH PROFESSIONS**

PROPOSED REGISTRATION ARRANGEMENTS

**CONSULTATION PAPER
DATED 19 SEPTEMBER 2008**

ISSUED BY THE PRACTITIONER REGULATION SUBCOMMITTEE

HEALTH WORKFORCE PRINCIPAL COMMITTEE

AUSTRALIAN HEALTH MINISTERS' ADVISORY COUNCIL

**COMMENTS BY THE
OPTOMETRISTS REGISTRATION BOARD of VICTORIA
OCTOBER 2008**

FOR SUBMISSION TO NRAIP BY 29 OCTOBER 2008

Proposal Number	Title/Descriptor	ORBV position on issue
2.1	Principles and Approach	Agreed
4.1.1	Application for Registration	Agreed
4.2.1	Information on initial application	Agreed
4.3.1	Criminal History Checks	Self declaration by applicants or Option 3
5.1	Qualification for Registration	Agreed
5.2	Recognition of equivalent qualifications	Agreed
5.3	Qualification approved by Boards	Agreed Also needed is a Boards ability to re register practitioners whose registration has lapsed and have grandfathered qualifications
6.1.1	Express powers of Boards	Agreed
6.1.2	Terminology: "Health Assessment"	Agreed
6.2.1	Empowering a committee	Agreed
6.2.2	Delegation of Power	Agreed
6.3.1	PI Insurance	Agreed
6.3.2	PII guidelines issued by Boards	Agreed
6.4.1	Power to refuse Registration	Agreed
6.4.2	Fraudulent applications	Agreed
6.5.1	Refusal Process	Agreed
6.5.2	Refusal Process	Agreed
6.6.1	Review of Decisions	Agreed
7.1	Sub-types of registration	Agreed
7.3.1	Non-practising registration	Agreed
7.3.2	Non-practising registration	Agreed
7.4.1	Student registration	Option 2 as exists in Victoria now
7.5	Corporate registration	Agreed
8.1.1	Courtesy titles	Agreed
8.3.1	Dentistry practice restrictions	Not Applicable to Optometry
8.4.1	Optometry Practice restrictions	Agreed, Restriction on plano contact lenses should be included. For the protection of the public
8.4.2	Exempting registered orthoptists	Unconditional exemption should not apply. Protection of the public should be via the legislative protection offered via the Victorian and South Australian Acts.*
9.2.1	Continuing practitioner competence	Agreed
9.2.2	Legislate Boards' Powers	Agreed
9.3.1	Annual reporting obligations	Agreed

9.4.1	Monitoring professional competence	Agreed
9.4.2	Power to issue standards guidelines	Agreed
9.4.3	Registrants reporting obligations	Agreed
10.1.1	Specialist endorsement	Agreed
10.1.3	Protection of specialist titles	Agreed
10.2.1	Endorsement to prescribe medicines	Agreed
10.3.1	Other endorsements	Agreed
11.1.1	Duration of registration	Agreed
11.2.1	Registration certificates	Agreed
11.2.2	Practising certificates	Agreed
11.2.3	Surrender of registration certificates	Agreed
11.2.4	Notification of change of address	Penalty should apply but at the discretion of the Board
11.2.5	Notification of employment address	Agreed, addresses should be supplied to the Board
11.3.1	Period of grace	Agreed, grace period to apply
11.4.1	Reinstatement to the register	Agreed, but the period of lapsed registration is greater than 2 years then the Board should have discretion to grant registration under whatever conditions it deem fit.
11.5.1	Removal from the register	Agreed
12.1	Transition provisions	Agreed

- 8.4.2 The Victorian Boards position on the proposal that Orthoptists be exempted from committing an offence for prescribing spectacle lenses in the normal course of their practice is that this exemption should not be unconditional. A full understanding of the health of the patient's eyes is imperative to the safe prescribing of spectacles.

In Victoria the public have the added protection that if spectacles are prescribed by an Orthoptist they have to have either:

1. been examined by an Optometrist or Ophthalmologist in the preceding 6 months and referred to the Orthoptist for the refraction and prescribing of spectacles.
2. the Orthoptist must be employed by a registered funded agency within the meaning of the Health Services Act 1988 or
3. the Orthoptist must be employed by a medical practitioner registered under the HPRA 2005 who practises as an Ophthalmologist

Given the level of training Orthoptists receive the public need this level of protection to ensure the safe prescribing of spectacles.