THE OPTOMETRISTS REGISTRATION BOARD

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10 MAR 2003

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MRA Review
Productivity Commission
P 0 Box 80
BELCONNEN ACT 2616

Dear Sir

SUBMISSION ON TTMRA AND MRA

I have been instructed by the above Board to provide a submission in relation TTMRA and MRA.

Firstly, Western Australia has not signed the TTMRA- Therefore, an applicant can only apply for registration if he or she is registered in another State of Australia and then applies under MRA.

When the decision to introduce MRA and later TTMRA legislation was made, competency standards for optometry were developed and adopted to ensure a consistent approach to recognition of qualifications and quality of health care in Australia and New Zealand.

At that time, it was agreed by all the registration Boards that Australian and New Zealand Colleges of Optometry would undergo accreditation and that graduates of accredited colleges would be eligible for registration in all Australian and New Zealand jurisdictions, however, all overseas-trained optometrists would be required to take an examination based on the competency standards.

The New Zealand Registration Board was a party to that process and gave it full support, however, the New Zealand Government insisted that an exception be made for optometrists registered in the United Kingdom, being "Members of the British College of Optometry - MBCO".

The acceptance of MBCO optometrists is opposed by the New Zealand Board and its Health Department. The New Zealand Government has undermined the effort to have a consistent approach to applicants by its insistence on retaining automatic registration for this group.

British trained optometrists undergo a three year academic training program, while the Australian and New Zealand programs are four years (and five in Melbourne). They will evolve to uniformly being a five year academic program.

Moreover, in the United Kingdom, it may only take a short "upgrade" course to convert the optometrist's original qualification (which may not be British) to the MBCO.

It is now the case that optometrists registered in the United Kingdom (who are not educated in Australia and New Zealand and have never practised in Australia or New Zealand) are granted New Zealand registration, without ever setting foot in New Zealand and then register in Australia by TTMRA. This is outside the intention and the spirit of the legislation and provides a loophole that sees applicants with this qualification as the only overseas-trained optometrists not required to sit an examination.

The Board recommends that:-

1 . Citizenship of Australia or New Zealand should be a requirement for any TTMRA application.

2. All optometrists from courses that are not accredited by The Optometry Council of Australia and New Zealand should be required to take The Optometry Council competency-based examinations.

3. An optometrist applying for registration under TTMRA should practise for a mandatory period of time in Australia and New Zealand (whichever of the two Countries they are registered in) before being eligible to take advantage of TTMRA.

Mutual Recognition (MRA)

The present Act only provides for a written notice between Boards about an applicant to state that the applicant is not the subject of disciplinary proceedings. It should include whether the person is the subject of a complaint. In many occasions, disciplinary proceedings may not occur for a number of months after a complaint is received.

As part of the Mutual Recognition Act, it would be appropriate that the level of penalties imposed by various Boards should in some way be standardised. At present, the penalties imposed in one State may result in an applicant not being considered to be subject to any disciplinary matters or penalties. Whereas, in another jurisdiction there may have been a penalty invoked.

There should be a provision that the status of an applicant be required to be obtained from all jurisdictions, not just from the last jurisdiction as shown on the Mutual Recognition form.

Whilst in principle, the philosophy of Mutual Recognition is fine, there are often situations where, collectively jurisdictions have agreed a standard for examination or accreditation, however, due to delay in amendments to legislation being past in those jurisdictions, loopholes can be created where an applicant may be able to be registered in one of those jurisdictions, contrary to the intent of the rest of the Country.

Please contact me if you have any queries.

Yours faithfully

C D EMMOTT
REGISTRAR