THE OPTOMETRY COUNCIL of Australia and New Zealand

Examination and Accreditation in Optometry

ACN 074 875 111
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19 March 2003

MRA Review
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Sir/Madam

The Optometry Council makes the following submission in relation to the review of the TTMRA.

1. Background

In the early 1990s, with the aim of achieving a uniform and equitable standard for entry to the profession, the optometrists registration boards in Australia and New Zealand decided to accredit the undergraduate optometry training programs offered by Australian universities, and the University of Auckland, with reference to a uniform standard.

As it was not practical for the registration boards to accredit all the optometry courses throughout the world, it was also decided that overseas-trained optometrists should be required to demonstrate their competence by successfully completing a competency-based examination.

The Optometry Council was established in 1996 to carry out these functions, both having the goal of providing a system of quality assurance for the registration boards that all those entering the profession of optometry are competent to practise to contemporary standards.

Requiring overseas-trained optometrists to pass a competency-based examination necessitated legislative amendment in most jurisdictions, and was achieved Australia-wide by 1997.

Regrettably, this is not the situation in New Zealand. Despite continuing effort on the part of the optometrists registering authority in New Zealand (the Opticians Board), membership of the (UK) College of Optometrists has been retained in Regulations to the Opticians Board's governing act.

2. Impact of the TTMRA

As a result, members of the College of Optometrists are eligible for immediate registration in New Zealand, and can do so simply by correspondence. Using the provisions of the TTMRA, they are then able to cross the Tasman and register with the one of the participating Australian boards. In doing so, the competency-based assessment process that all other overseas-trained optometrists must pass to attain registration in Australia and New Zealand is bypassed.

Registration with one of the Australian optometrists registration boards means that an overseas trained optometrist is able to receive a 'positive skills assessment' for migration to Australia under the Skilled Migration Program.

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3. Attempts to resolve the problem

Representations to the New Zealand Ministers for Health and Commerce, respectively, on behalf of all of the Australian optometrists registration boards have not been able to persuade the New Zealand government to remove the membership of the (UK) College of Optometrists from the Opticians Act Regulations. In 1998, 1999 and 2000, with the support of the then Federal Minister for Health, attempts were made to resolve this problem via AHMC and AHMAC meetings, also to no avail.

The loophole created by the TTMRA has been, and continues to be, used extensively. Up to date data on the numbers of optometrists (and their country of training) utilising the TTMRA to obtain registration in Australia will be included in submissions from individual optometrists registration boards, and in information that will form part of the DEST submission.

4. Need for a solution

It is the view of the Optometry Council that the TTMRA loophole :

- **Significantly undermines the accepted need for - and the profession's efforts to achieve - a uniform basis for registration of overseas-trained optometrists.**

- **Creates a lack of confidence on the part of the optometrists registration boards in their processes by being required to register persons without first being able to verify that they are able to practise to contemporary Australian standards.**

- **Discriminates in favour of optometrists having membership of the UK College of Optometrists over those trained elsewhere.**

The Optometry Council seeks a solution to a most unsatisfactory situation, and asks that consideration be given to either, amending the TTMRA such that only Australian and New Zealand trained optometrists are able to utilise it, or alternatively exempting the occupation of Optometry from the operation of the TTMRA.

A mutual recognition-type arrangement exists for optometrists trained in Australia and New Zealand in the absence of TTMRA. Therefore the above proposed solutions would not in any way hinder the ability of Australian and New Zealand trained optometrists to work in each other's countries.

Both of the above solutions also have the advantage of allowing New Zealand to continue to recognise membership of the (UK) College of Optometrists for registration purposes, while at the same time preventing members of the College from practising in Australia without first passing the Optometry Council's examination.

Yours faithfully

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Executive Officer