Optometrists Board of Queensland

PLEASE ADDRESS ALL CORRESPONDENCE TO -

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MRA Review Productivity
Commission PO Box 80
BELCONNEN ACT 2616

Dear Sir/Madam

The Optometrists Board of Queensland 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 of which this Board supports 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.

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. In Queensland 15 Registrants have utilised the TTMRA to obtain registration in Australia where their sole qualification is the MBCO.

4. Need for a solution

It is the view of the Optometrists Registration Board of Queensland 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 this Board in the processes of registering 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 in the world.**

Whilst the Board asks that consideration be given to exempting the occupation of Optometry from the operation of the TTMRA it appreciates that this may be difficult to achieve. However other options are not readily available.

Exempting Optometry from the TTMRA would 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 practicing in Australia without first passing the Optometry

Council's examination.

The Board would also like the Commission to consider including the following measures in respect of TTMRA if exemption for the profession of Optometry is not possible:

- movements between New Zealand and Australia can only occur if the applicant for registration in Australia under TTMRA has resided and worked professionally in New Zealand for a period of 1 year immediately prior to applying under TTMRA for registration in an Australian State or Territory.

- That the jurisdiction where an applicant seeks to be registered can refer any question of qualification legitimacy or quality to an Entity acknowledged and prescribed in regulation by that Board as established for the purpose of assessing qualifications.

Yours faithfully
DAVID WATSON



Assistant Registrar