

ORTHOPTIC ASSOCIATION OF AUSTRALIA INCORPORATED

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NCP Inquiry
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

On behalf of the **Orthoptic Association of Australia Inc. (OAA)**, I wish to submit the following with regard to National Competition within the health care industry.

An orthoptist is an allied health care practitioner who specialises in the investigation, diagnosis and management of eye movement disorders and associated vision problems. An orthoptist plays a role in the rehabilitation of low vision patients and patients with visual disturbances caused by congenital defect, injury or disease. Orthoptists work in co-operation with medical specialists, such as ophthalmologists, neurologists and paediatricians, as well as other allied health specialists such as occupational therapists and physiotherapists. The practice of orthoptics commenced in London in 1920 and Australia established its first clinic in Melbourne in 1931. The study of orthoptics is a 3.5 year Bachelor degree at La Trobe University in Melbourne and 4 years in Sydney at the University of Sydney.

The OAA would like to outline two areas of concern. It is felt that there would be significant gains to the Australian community and economy if these impediments to efficiency and competition were removed.

Firstly, the issue of GST. As outlined above, orthoptics is a well established and recognised health care profession, and is acknowledged as a member of the allied health care group. To support this is the fact that the OAA is a member of the health Professional Council of Australia (HPCA), the peak body representing allied health in Australia.

The Commonwealth Government's taxation reform package announced in August 1998, *Tax Reform: Not a New Tax, a New Tax System, The Howard Government's Plan for a New Tax System*, stated that under the new tax system the supply of 'medical services' would not be subject to

GST. The TCC reported that the Government had only intended to give GST-free status to mainstream health services, rather than those of an alternative nature. A number of services provided by allied health professionals were given GST-free status, some of which were considered 'mainstream', such as physiotherapy and occupational therapy. Orthoptics is a well recognised and established mainstream allied health profession in Australia and around the world yet, unlike similar allied health professions, orthoptic services are not currently included in the list of GST-free services under the *A New Tax System (Goods and Services Tax) Act 1999*, and as such, orthoptists do not have status as GST exempt allied health professionals. The result of this is that Australians seen in private orthoptic practice will be charged GST and that orthoptics is not aligned with other allied health care professions. Subsequent to this, those allied health professions involved in service provision with MedicarePlus are those primarily listed in Table 38-10 for GST exemption – again, orthoptics has been omitted.

Secondly, orthoptists not being able to refract and prescribe spectacles and visual aids in every Australian state. It has been a long and ongoing debate between the optometrical profession and orthoptics as to whether or not orthoptists are qualified to refract and prescribe spectacles, and to what extent this would benefit the Australian community. Orthoptists in every Australian state are affected by this, however, I would like to provide more detail on the two states with the greater number of orthoptists. In NSW, the Public Health Act 2002, Section 10 AE needs to be modified to correct this anomaly. Orthoptists have integral knowledge and skills of assessing the refractive error of the eyes and determination of the most appropriate correction. It is anti competitive and wasteful of resources for orthoptists to be unable to prescribe spectacles as part of their clients' care. In Victoria, the Optometrists Registration Act 1996 should be amended as the existing Act is restrictive to orthoptists' practice for no apparent net benefit to the public and public health. Additionally, the Act prevents the expansion of the scope of the orthoptic profession to provide increased eye care services to the public. Orthoptists are regulated by an independent registration body, the Australian Orthoptic Board (AOB) and have extensive experience with the identification of eye pathology. There is documented support for Orthoptists to refract and prescribe glasses by the President of the Royal Australian and New Zealand College of Ophthalmologists (RANZCO).

I thank you for the opportunity to provide this submission and I welcome your response.

Yours faithfully,

Valerie Tosswill
President
OAA