

# OPTOMETRISTS REGISTRATION BOARD OF VICTORIA

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8 August 2003

14 AUG 2003

Productivity Commission  
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## **EVALUATION OF THE MUTUAL RECOGNITION SCHEMES - DRAFT RESEARCH REPORT JUNE 2003**

Thank you for the opportunity to comment on the Draft Report.

We have already written to you on the 4<sup>th</sup> August 2003 in respect of direct concerns the Board has relating to overseas optometrists gaining entry to Australia via TTMRA who may not otherwise qualify for registration in Australia. This is of course a concern for all the Australian jurisdictions and, we believe, the New Zealand Board.

In specific reference to the Draft Report we offer the following comments:

### 'PRELIMINARY FINDINGS 5.6

*Australian Occupation Registration Authorities should continue to consider developing national registration systems where the benefits justify the costs.'*

National registration makes much sense. It is advocated by the Practitioner Regulation Unit of the Victorian Department of Human Services.

It is considered that establishing a national register base would not be too difficult, acknowledging that there would be some historical gaps in the information held by the different jurisdictions, the essentials would all be present. It is submitted that there would be significant cost benefits which would provide a quick payback for any initial costs. For instance, an estimate of the time taken for providing and seeking Mutual Recognition and Trans Tasman Mutual Recognition confirmation on applicants would be three to four person hours per week at the Victorian Board alone.

The Optometrists Registration Board of Victoria will have the subject placed on the Agenda for the conference of the Council of Optometry Registering Authorities (CORA) in November this year.

### 'PRELIMINARY FINDINGS 5.9

*The efficacy of professional standards and, therefore, confidence in the Mutual Recognition process, is being enhanced by the trend for jurisdictions to require some degree of 'current competency' as a requirement of registration.'*

Its worth noting that because the Department of Optometry and Vision Sciences, The University of Melbourne will not assess 'current competency', this is not feasible in Victoria without setting up an entirely new process of assessment for registered optometrists. We understand that similar circumstances apply in the other jurisdictions. This would be very costly. An alternative is to rely on The Optometry Council of Australia and New Zealand (OCANZ) to set up some sort of procedure, or even perhaps put people through their present examination or part thereof. In turn this would be costly for candidates.

#### 4. IMPACT OF THE ARRANGEMENTS

The fact that optometry stands out with such a high percentage of registrations illustrates the point that CORA and its constituents have been trying to highlight with MBCO's and MCOptom's gaining registration in New Zealand through the New Zealand back door. It is incumbent on the legislators to do something to rectify this anomalous situation. It appears that the data supplied by optometry - may be different from other professions because 'the lack of comprehensive data etc' is not necessarily accurate for optometry.

The Victorian Registrar will undertake further enquiry of the Board's records to ascertain if additional data can be drawn to establish the extent to which Mutual Recognition registrants in Victoria have obtained their registration in other States or Territories by virtue of TTMRA.

The figures in the Tables 4.3 and 4.4 in the Draft Records Report support our contention. The Optometrists Association Australia's comment that the 'abuse of the arrangements has become widespread' is fully supported.

#### 5. PROCESSES FOR APPLYING MUTUAL RECOGNITION OBLIGATIONS

##### 'Jurisdiction Shopping'

*A number of interested parties expressed concern about jurisdiction shopping leading to 'back door entry' i.e., 'individuals shop around' to find the jurisdiction with the easiest or cheapest requirements for registration, and then use the MRA and TTMRA to move to their preferred jurisdiction. This concern was often raised in discussions about the movement of third country-trained professionals. In some cases, it appears that New Zealand accepts a wider range of qualifications in satisfying registration requirements than does Australia. This may occur for a variety of reasons, such as historical arrangements or ties with a particular country or shortages of a particular occupations leading to loosening of requirements.'*

'Historical arrangements' are the cause of the problem with the MBCO and/ MCOptom qualification. There is no shortage of optometrists in Australia and New Zealand which justifies the unquestioning acceptance of this one overseas qualification for man power reasons. It is discriminatory of New Zealand to allow registration of those practitioners with the inferior MBCO/MCOptom as opposed to practitioners with other qualifications from other countries. There is still a strong case to administer a competency examination at a standard equivalent for entry into the profession as has been set up through The Optometry Council of Australia and New Zealand (OCANZ). Such an examination ensures that there is an even standard applied to all registered optometrists. The alternative to an entry level-examination is to have an accreditation system for all overseas schools, something which the small profession of optometry in Australia cannot afford. It is well to remember that the setting up of OCANZ was at the suggestion of The National Office of Overseas

Skills Recognition (NOOSR). The push for skills recognition was not something which came from the Boards or the profession. In fact the Government, through NOOSR, funded optometry to run workshops to establish competency standards and surely should be interested in seeing those standards maintained.

This and other Australian boards, and the New Zealand Board, are deeply concerned about their ability to meet their charters, particularly in relation to the existing arrangements in the European Union for mutual recognition and the imminent admission of a number of other countries to it.

Yours faithfully

A handwritten signature in black ink, appearing to read 'CK Beamish', with a stylized, cursive script.

CK BEAMISH  
REGISTRAR