



Consultation Paper

**The revocation of Registration pathways 2 and 3 for
registration in the Optometry scope of practice**

6 September 2023

Introduction

1. The Optometrists and Dispensing Opticians Board (ODOB, the Board) is responsible under the Health Practitioners Competence Assurance Act 2003 (HPCA Act) for ensuring that optometrists and dispensing opticians are competent and fit to practise when they apply for registration. Section 118 of the HPCA Act requires the Board to prescribe the qualifications required for scopes of practice, and for that purpose, to accredit and monitor education institutions, degrees, courses of study or programmes.
2. Currently, the Board has three scopes of practice for optometrists (Provisional optometrist, Optometrist, and Specialist optometrist), and one scope of practice for dispensing opticians. There are six registration pathways:
 - Registration Pathway 1: Optometrist
 - Registration Pathway 2: Optometrist educator
 - Registration Pathway 3: Optometrist educator – Prescriber
 - Registration Pathway 4: Provisional optometrist
 - Registration Pathway 5: Dispensing optician
 - Registration Pathway 6: Specialist optometrist – Ophthalmic laser surgeries.
3. Registration pathway 2 and 3 has had limited uptake and was last used in 2017. In addition, the currency and validity of the prescribed qualifications for Registration pathway 2 and 3, which are listed on the Board’s website, have been identified as a risk. To simplify the administration of registration processes, and to ensure public health and safety, the Board proposes to revoke Registration pathways 2 and 3 to ensure that there is consistency in the qualifications for registration as an optometrist in Aotearoa New Zealand (NZ).

Background

4. Prior to 1 April 2017, the Board had four Optometrist scopes of practice:
 - Optometrist (i.e., practitioners who did not hold a therapeutic qualification and therefore could not prescribe medicines)
 - Optometrist with therapeutic pharmaceutical agent (TPA) endorsement (i.e. practitioners who held a therapeutic qualification and who were able to prescribe medicines)
 - Educator optometrist, and
 - Educator optometrist TPA endorsement.
5. These scopes and their associated lists of prescribed qualifications were developed in 2004.
6. Applicants with international qualifications who were not eligible to sit the Optometry Council of Australia and New Zealand’s (OCANZ’s) Competency in Optometry Examination (COE)¹ and who had an offer of employment from an accredited education institution, could apply for registration in the Educator optometrist scope of practice. Those applicants who

¹ <https://www.ocanz.org/examination/competency-in-optometry-examination/>

also held the required therapeutics qualification could apply for registration in the Educator Optometrist Therapeutic Pharmaceutical Agent (TPA) endorsement scope of practice.

7. In 2017 the Board decided to amend the Optometrist scopes of practice, which included the amalgamation of the legacy “Optometrist” and “Optometrist TPA” scopes of practice. The educator scopes of practice were revoked and changed to registration pathway 2 (Optometrist Educator) and registration pathway 3 (Optometrist Educator – Prescriber). These pathways led to registration in the (new) Optometrist scope of practice, but with conditions as set out in the registration pathways document (Appendix 1). This change came into effect on 1 April 2017.
8. From 2004 to 2023, the Board has only registered 19 practitioners in either the two Educator optometrist scopes or registration pathways 2 and 3:
 - A total of seven registered in Registration pathway 2 (i.e., practitioners who may only practise in an educational institution, and are prohibited from prescribing medicines).
 - A total of 12 registered in Registration pathway 3 (i.e., practitioners who may only practise in an educational institution).
 - The last registrations in either of these two registration pathways were done in 2017.
 - Out of the 19, only one is currently practising (registered in Registration pathway 3)².
9. Because Registration pathways 2 and 3 are infrequently used, the prescribed qualifications for these pathways (listed on the Board’s website) are not regularly assessed for current practice and qualification expectations. This creates a potential risk to the public, particularly with the Government’s “Green List Straight to Residence pathway”^{3,4} announced in April 2023. The Green List essentially fast-tracks and grants NZ residency visas for applicants registered in one of the health professions on the list. Both optometrists and dispensing opticians are listed, and the ODOB has since had increased requests from international practitioners enquiring about registration pathways in NZ.

Optometrist educator (Registration pathway 2) and Optometrist educator – Prescriber (Registration pathway 3)

10. **Registration Pathway 2, Optometrist educator:**
 - This Registration pathway is for those who:
 - do not hold one of the prescribed qualifications listed in “Registration Pathway 1”,
 - who will be working solely in an educational institution, and
 - who have not yet completed postgraduate education in ocular therapeutics.

² As on 1 June 2023.

³ New Zealand Government (2023). Thirty-two new health sector roles added to Green List Straight to Residence pathway, 11 April 2023. Available at: <https://www.beehive.govt.nz/release/thirty-two-new-health-sector-roles-added-green-list-straight-residence-pathway>.

⁴ New Zealand Immigration (2023). Government announces more health roles to be added to the Green List, 11 April 2023. Available at: <https://www.immigration.govt.nz/about-us/media-centre/news-notifications/government-announces-more-health-roles-to-be-added-to-the-green-list>

- This allows for registration in the Optometrist scope of practice, with a condition⁵ (with two restrictions) applied that indicate:
 - the practitioner may only practise in an educational institution, and
 - is prohibited from prescribing medicines.
- A list of prescribed qualifications is provided (refer to Appendix 1).

11. **Registration Pathway 3, Optometrist educator – Prescriber:**

- This Registration pathway is for those who:
 - hold a prescribed qualification listed under “Registration pathway 2” above, and
 - have completed a Board-accredited therapeutics qualification.
- This will allow for registration in the Optometrist scope of practice, with a condition⁶ applied that indicates the registrant may only practise in an educational institution.
- These registrants may prescribe medicines.

12. The current *Scopes of Practice for Optometrists and Dispensing Opticians 2020* (Gazette notice number 2020-gs5669)⁷, lists the following prescribed qualifications under the “Optometrist Scope of Practice”, and references “Pathway 2” and “Pathway 3”:

“Prescribed Qualifications for Registration in the Optometrist Scope of Practice

The optometrist must satisfy all the requirements from one of the following options:

- hold a primary optometry degree from a New Zealand or Australian university accredited by the Board for the purposes of registration in New Zealand, and published on the Board’s website (Pathway 1 – “Optometrist”); or
- hold a primary optometry degree from an overseas university accredited by the Board for the purposes of registration in New Zealand and published on the Board’s website, and have an offer of employment to work as an educator in optometry in a New Zealand education institution (**Pathway 2 – “Optometrist Educator”**); or
- hold a primary optometry degree from an overseas university accredited by the Board for the purposes of registration in New Zealand and published on the Board’s website, and have completed a Board-accredited therapeutics qualification, and have an offer of employment to work as an educator in optometry in a New Zealand education institution (**Pathway 3 – “Optometrist Educator - Prescriber”**); or
- hold General Registration in Australia.”

⁵ Pursuant to s22(1) of the HPCA Act.

⁶ Ibid.

⁷ See the Scopes Gazette notice, nr 2020-gs5669, published 8 December 2020. Available at: <https://gazette.govt.nz/assets/pdf-cache/2020/2020-gs5669.pdf>.

Board's proposal

13. The Board **proposes to revoke Registration pathways 2 and 3**. The reasons for the Board's proposal are that:
- The Board wishes to simplify the registration process.
 - There is no demand for Registration pathways 2 and 3, with only one practitioner currently registered after following this pathway. Revoking Registration pathways 2 and 3 will not affect that practitioner.
 - The currency and validity of the prescribed qualifications for Registration pathways 2 and 3 has been identified as a risk. Because the pathways are used infrequently, the assessment process for practitioners who may apply for registration in Registration pathways 2 and 3 would be complex and resource intensive. Given the ODOB's size, this is not efficient or viable in the long term.
 - All applicants for registration as an optometrist in NZ should be required to hold one of the Gazetted prescribed qualifications for the optometrist scope of practice, as listed on the Board's website.
 - There will still be a pathway for registration for applicants with overseas qualifications. The ODOB has an established and longstanding memorandum of understanding with OCANZ, which has a credible and quality assured process for the assessment international graduates to register in NZ (and Australia):
 - Applicants who hold an overseas optometry qualification and pass the OCANZ's Competency in Optometry Examination (COE) will be eligible to apply for registration in the Provisional Optometrist scope of practice in NZ, pending completion of an approved therapeutics qualification. They will be required to work under supervision until they receive registration in the Optometrist scope of practice.
 - Applicants who hold an overseas optometry qualification and pass OCANZ's Competency in Optometry Examination (COE) and pass the OCANZ Assessment of Competence in Ocular Therapeutics (ACOT) or an OCANZ-accredited ocular therapeutics qualification will be eligible to apply for registration in the Optometrist scope of practice.
 - Applicants who hold general registration as an optometrist in Australia remain eligible for registration in the Optometrist scope of practice in NZ under the Trans-Tasman Mutual Recognition Act 1997.
 - Standardisation will make it easier for the Board to be assured about applicants' qualifications and competence to practise. This is in the interests of public health and safety, which is the principal purpose of the HPCA Act.
 - Members of the public or patients do not always understand the difference in being treated by an optometrist registered in the full scope, and those who have conditions on their scope to limit their practice to an educational institution. This simplification will eventually remove the need for conditions limiting practice to educational institutions and this will help the public or patients to understand that all optometrists who hold any of the Gazetted prescribed qualifications are able to perform their full scope of practice, regardless of the environment in which they are practising.

- Simplifying the registration pathways will also ensure consistency in qualifications for registration and will limit risk given Government’s “Green List Straight to Residence pathway” announcement in April 2023, as the ODOB has received more frequent inquiries internationally.
14. If the Board’s proposed revocation of the current registration pathways 2 and 3 is confirmed, there will be four registration pathways which will be renumbered and described as follows:
- Registration Pathway 1: Dispensing Optician
 - Registration Pathway 2: Provisional Optometrist
 - Registration Pathway 3: Optometrist
 - Registration Pathway 4: Specialist Optometrist – Ophthalmic Laser Surgeries.

Purpose

15. The purpose of this paper is to seek any **feedback or comments** on the proposed revocation of Registration Pathways 2 and 3.

Have your say

16. If you wish to make a submission on the Board’s proposal, please provide this in writing by **on 29 October 2023 (end of day)**. The Board does not guarantee that submissions received at the Board’s offices after that date will be considered. Submissions will not be published.
17. Submissions can be emailed to registrar@odob.health.nz. or submitted via post at:
- The Registrar
 Optometrists and Dispensing Opticians Board
 PO Box 9644
 Wellington 6141

Appendices

18. The list of appendices below:

Appendix 1	Current Registrations pathway document
Appendix 2	Proposed Registrations pathway document, where Registration pathway 2 and 3 is revoked
Appendix 3	Proposed Scopes Gazette notice