

Public consultation on the revised *Endorsement for scheduled medicines registration standard and Guidelines for use of scheduled medicines*

February 2017

Responses to consultation questions

Please provide your feedback as a word document (not PDF) by email to optomconsultation@ahpra.gov.au by close of business on 31 March 2017.

Stakeholder details

If you wish to include background information about your organisation please provide this as a separate word document (not as PDF document).

Organisation name
Deakin University
Contact information <i>(please include contact person's name and email address)</i>
Assoc. Prof. James Armitage, Optometry Course Director [REDACTED]

Submission discretion

Submission confidentiality <i>Submissions will generally be published unless you request otherwise.</i> <i>Please indicate below if you <u>do not</u> want your submission published, or want all or part of it treated as confidential.</i>

Your responses to consultation questions

Revised registration standard and guidelines for use of scheduled medicines	
<i>Please provide your responses to any or all questions in the blank boxes below or if you wish to include your response as a separate word document, please provide this in word format only (not PDF).</i>	
1. Is the proposed revised registration standard clearer and easier to understand compared with the current standard?	
Yes	
2. Is the proposed revised guideline clear and easy to understand?	
Yes	
3. Is there any content that needs to be changed or deleted in the proposed revised registration standard?	
No, and we support the inclusion of the word 'use' and the inclusion of 'for the purposes of the practice of optometry' for the reasons outlined in the consultation paper.	
4. Is there any content that needs to be changed or deleted in the proposed revised guidelines?	
No, and we support the inclusion of Appendix B that lists the S2, S3 and S4 medicines that endorsed optometrists are qualified to prescribe. We also support the proposed deletions and additions from the S4 list. It might assist optometrists and pharmacists if there was a prominent link to Appendix B on the OBA's homepage. Optometrists and pharmacists might also be assisted if this information included whether the medicine attracts a PBS subsidy and whether there are any associated restrictions/conditions.	
5. Is there anything missing that needs to be added to the proposed revised registration standard?	
No	
6. Is there anything missing that needs to be added to the proposed revised guidelines?	
No	
7. Do you have any other comments on the proposed revised registration standard or guidelines?	
Yes, amending the Registration Standard to state that optometrists holding a scheduled medicines endorsement are qualified in respect of topical S2, 3 and 4 medicines for the purposes of the practice of optometry is consistent with the education and training provided by the Deakin Optometry Program. Graduates of our Program are qualified in respect of medicines in each of these classes. It	

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is in the public interest for patients of endorsed optometrists to be able to access new drugs in those classes when they become available in Australia. Further, it seems appropriate to have a process for adding and deleting medicines from the OBA's list that is administratively easy but has safeguards in place. Having the list attached to the Guidelines instead of the Standard seems to strike the right balance because proposed changes to the list will be on the advice of the OBA's Scheduled Medicines Advisory Committee and any changes can occur only after consultation with the relevant professional organisations.