



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

Response template: Public consultation - proposed *Supervised practice framework* and supporting documents

The National Boards (excluding Pharmacy and Psychology) and Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the proposed *Supervised practice framework* (framework) and supporting documents.

This response template is an alternative to providing your response via the online survey available on [our website](#).

IMPORTANT INFORMATION

Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

The information collected will be used by AHPRA to evaluate the proposed framework and supporting documents. The information will be handled in accordance with AHPRA's privacy policy available [here](#).

Publication of responses

Published responses will include the name of the individual and/or the organisation that made the response.

You must let us know if you do **not** want us to publish your response.

Please see the [public consultation papers](#) for more information about publication of responses.

Submitting your response

Please send your response to: ahpra.consultation@ahpra.gov.au

Please use the subject line: Feedback on Supervised practice framework

Responses are due by: **17 December 2019**

General information about your response

Are you responding on behalf of an organisation?	
Yes	What is the name of your organisation? Optometry Australia Suite 101, 68-72 York Street, South Melbourne, Victoria 3205
Name (optional)	██████████
Contact phone number (optional)	██████████

Public consultation questions

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the proposed framework and supporting documents.

Use the corresponding text boxes to provide your responses. You do not need to answer every question if you have no comment.

National Boards and AHPRA have developed the *Supervised practice framework* (the framework) and supporting documents to enable a responsive and risk-based approach to supervised practice across the National Registration and Accreditation Scheme (the National Scheme).

The National Boards' preferred option is to adopt the proposed framework and supporting documents.

1. How helpful and clear is the content and structure of the proposed framework? Please explain your answer.

Content and structure are clear in the proposed framework. Structure is very text heavy, break out boxes or graphical summary may assist readability.

The word 'consult' is used to describe the interaction between a supervisee and supervisor in the levels of supervised practice (see Section 5 Levels in the framework and the *Fact sheet: Supervised practice levels*). The word 'consultation' is often used to describe the interaction between a patient/client and a health practitioner.

2. Is the meaning of 'consult' clear for the purposes of the supervised practice levels? Why or why not?

The use of 'consult' is clear in this context as it appropriately captures the interaction between the supervisor and supervisee.

3. Is there any content that needs to be changed, added or removed in the proposed framework and/or supporting documents? If so, please provide details.

The previous guidelines seemed to provide more information around reporting requirements for supervisors (including frequency of reports). We are assuming this will be covered in more detail in:

- *Fact sheet – Planning, assessment and monitoring and compliance* (to be developed)

4. Are there any other ways that the Board can support supervisees, supervisors and employers involved in the supervised practice arrangement?

While we appreciate the difficulty in publishing any rubric or guide to how determinations on levels of supervised practice are made (due to the variables involved with individual presentations), we would like to flag that lack of information in this area is the most common complaint we receive about the process, particularly in the area of return to practice after family leave. This uncertainty has a flow-on effect making the process more difficult than it needs to be, as members have often told us that a potential supervisor will often not agree to supervision until they have (even a rough indication) of what they are signing up for. Consequently, this leads to a chicken and egg situation where a supervisor doesn't want to commit until the plan is approved and the amount of supervision determined, and the plan cannot be approved until a supervisor is secured.

Provision of *any* information or guidelines in this area would greatly assist all parties and improve transparency in this process. Hypothetical case studies with examples of supervision levels required for various scenarios would be extremely useful.

It would also assist those contemplating parental (or other extended leave) to make more informed choices surrounding changes to registration status if they had a better understanding of what might be expected of them when returning to practice.

We believe the Optometry board could also potentially do more to support larger organisations (eg universities, Centre For Eye Health, Australian College of Optometry) in taking optometrists for the direct supervision level as this is the most difficult level to obtain a supervisor for (and these organisations are already set up for this type of activity). We are a small profession and direct supervisors are hard to find, especially in rural and remote areas.

5. Is there anything else the Board should consider in its proposal to adopt the framework and supporting documents, such as impacts on workforce or access to health services?

6. Do you have any other comments on the proposed framework and/or supporting documents?

Thanks!

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the proposed framework and supporting documents.