

## 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](mailto: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).

<b>Organisation name</b>
Optometry Australia
<b>Contact information</b> <i>(please include contact person's name and email address)</i>
Luke Arundel, National Professional Services Manager [REDACTED] 03 96688560

#### Submission discretion

<b>Submission confidentiality</b> <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

<b>Revised registration standard and guidelines for use of scheduled medicines</b> <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. The proposed revised registration standard is clear and easy to understand. Referring to <i>classes</i> of topical medications used in the practice of optometry in the standard assists in simplifying this document. Aligning the wording in these documents to align with the majority of the relevant state and territory legislation provides an additional measure of consistency and clarity when compared with the current standard.
2. Is the proposed revised guideline clear and easy to understand?
Yes. The publication in the <i>Guidelines for use of scheduled medicines</i> of the full list of medications currently in the approved classes mentioned in the Standard provides additional clarity without ambiguity or confusion.
3. Is there any content that needs to be changed or deleted in the proposed revised registration standard?
No
4. Is there any content that needs to be changed or deleted in the proposed revised guidelines?
No
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?
Optometry Australia strongly supports the proposed changes to these documents. The current system is inefficient and impedes the timely access to treatments offering potentially significant benefits to patients obtaining comprehensive primary eye care. It requires significant regulatory time and resources to effect straightforward additions. Consequently, the Australian public faces significant delays in accessing up to date medications from endorsed optometrists. Products such as loteprednol and tafluprost have been available in this country for a long time but due to this legacy effect of earlier legislative frameworks, have not yet become available to optometry patients.

**Revised registration standard and guidelines for use of scheduled medicines**

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Optometry Australia stresses that there are appropriate oversight and safety controls in place under the proposed changes, as any update to the list of medications published in the guidelines is monitored by the Board's Scheduled Medicines Advisory Committee (SMAC). We do not anticipate any concerns for public safety arising from this measure. As the SMAC membership includes a multidisciplinary expert panel (comprising of medical practitioners (including ophthalmology), pharmacy and optometry practitioners and educators), the opportunity for key stakeholder input and an additional layer of oversight is provided for. This system gives us high confidence and ensures the safety of the public in any new medication being added to the list.

We would also like to note that this is an important step towards harmonisation of standards across the boards, and brings optometry in line with recent changes from other boards such as podiatry, nursing and midwifery.