

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
Bupa
Contact information <i>(please include contact person's name and email address)</i>
Rebecca Cross Head of Government Policy & Regulatory Affairs [REDACTED]
Brett Comer Acting General Manager, Bupa Optical [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. Bupa finds that the proposed changes are minimal, but they will create clarity regarding scheduled medicines. In practice, this will enable Optometrists to determine the best medicines as they see fit for patients.
2. Is the proposed revised guideline clear and easy to understand?	
	Bupa finds the proposed change is sufficiently clear and easy to understand.
3. Is there any content that needs to be changed or deleted in the proposed revised registration standard?	
	Bupa would suggest that the proposed revised registration could be made clearer by stating explicitly that the only list of acceptable medicines Optometrists can use in practice are listed in the guidelines.
4. Is there any content that needs to be changed or deleted in the proposed revised guidelines?	
	Bupa finds that the content within the proposed guidelines is sufficient.
5. Is there anything missing that needs to be added to the proposed revised registration standard?	
	Bupa finds that nothing at this point is required to be added to the registration standard.
6. Is there anything missing that needs to be added to the proposed revised guidelines?	
	Bupa would recommend including wording within the introduction of the revised guidelines that the revised guidelines must be read in conjunction with the revised standards; the revised guidelines are not a standalone document.
7. Do you have any other comments on the proposed revised registration standard or guidelines?	
	Overall, Bupa believes that the revised standards and guidelines will provide a simpler and more streamlined process. Historically, there have been lengthy waits for standard changes regarding accessing various medications. The proposed revised registration standard will provide a reduction in red tape for Optometrists, which will lead to better outcomes for Bupa customers.