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AMA submission – Optometry Board of Australia revised registration standards and guidelines for use of scheduled medicines

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Thank you for the opportunity to comment on the draft revised *Endorsement for scheduled medicines registration standard* and *Guidelines for use of scheduled medicines*.

The AMA opposes the amendment proposed by the Optometry Board of Australia (OBA) to the *Endorsement for scheduled medicines registration standard* (the Standard), which would remove the list of specific Schedule 4 medicines that the OBA considers an optometrist holding a scheduled medicines endorsement is qualified to obtain, possess, administer, prescribe or supply for use in the treatment of eye conditions.

Australian Health Workforce Ministerial Council approval of the Standard and the list is an important measure ensuring that there is additional scrutiny at the highest level of any changes to the list of S4 medicines within an optometrist's scope of practice.

Administrative efficiency should not compromise patient safety. No evidence has been provided to support the claim that patient access to appropriate eye care has been compromised because the list is attached to the Standard or that removing the list from the Standard will enhance delivery of care.

As noted in the Standard, the list of medicines specified in the endorsement does not itself authorise an optometrist to administer, obtain, possess, prescribe, supply or use a medicine on that list. The authorisation is provided under the legislation of each state and territory, and therefore legislative amendments determine the timing of access.

The AMA assumes the OBA will continue to follow the process for altering or expanding the list of S4 medicines attached to the Standard, which is outlined in the Australian Health Ministers' Advisory Council (AHMAC) *Guidance for National Boards: Applications to the Ministerial Council for approval of endorsements in relation to scheduled medicines* under section 14 of the National Law - 27 October 2016.

The AMA is not concerned about the other minor amendments proposed to the Standard and accompanying *Guidelines for use of scheduled medicines*.

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