

Consultation:
Proposal to revoke RMIT University's Certificate IV in Optical Dispensing qualification as an accredited, and prescribed qualification with the Optometrist and Dispensing Opticians Board of New Zealand

Released: 26 May 2022
Submissions Due: 7 July 2022

Introduction

1. The Optometrists and Dispensing Opticians Board (the Board, ODOB) is charged under the Health Practitioners Competence Assurance Act 2003 (HPCA Act) with prescribing and accrediting qualifications for every scope of practice that the Board publishes in the *New Zealand Gazette*.
2. Section 12 of the HPCA Act sets out that the Board may designate any one or more of the following as qualifications for its scopes of practice:
 - a degree or diploma of a stated kind from an educational institution accredited by the authority, whether in New Zealand or abroad, or an educational institution of a stated class, whether in New Zealand or abroad;
 - the successful completion of a degree, course of studies, or programme accredited by the authority;
 - a pass in a specified examination or any other assessment set by the authority or by another organisation approved by the authority;
 - registration with an overseas organisation that performs functions that correspond wholly or partly to those performed by the authority;
 - experience in the provision of health services of a particular kind, including, without limitation, the provision of such services at a nominated institution or class of institution, or under the supervision or oversight of a nominated health practitioner or class of health practitioner.
3. An authority may at any time, by notice in the *New Zealand Gazette*, amend, revoke, or replace a notice issued under section 12 of the HPCA Act, prescribing a qualification. This requirement arises under section 14(4) of the HPCA Act.
4. However, before publishing a notice under section 14 of the HPCA Act, the Board must consult about the proposal to amend, revoke, or replace with:
 - people the Board considers are able to represent the view of health practitioners (dispensing opticians) or of classes of health practitioners (dispensing opticians) registered with the Board;

- organisations that the Board considers will be affected by the proposal, or whose members the Board considers will be affected by the proposal (HPCA Act, section 14(2)).
5. Any amendment, revocation, or replacement of a notice pertaining to qualifications will not affect the registration of dispensing opticians who qualified within a scope of practice on the basis of having had the requisite qualification(s) for the scope of practice prior to the amendment, revocation, or replacement of the notice (HPCA Act, section 14(1A)).
 6. Section 118 of the HPCA Act sets out the functions of the Board, which includes the recognition, accreditation and setting of programmes to ensure the ongoing competence of health practitioners (dispensing opticians) (HPCA Act, section 118(1)(e)).

Background

7. In 2011, the Board received an application for accreditation of the RMIT¹ University's Certificate IV in Optical Dispensing as a prescribed qualification for registration in the optical dispensing scope of practice. Following review of the accreditation application and consultation with practitioners and stakeholders; the qualification was accredited as a prescribed qualification for registration in the optical dispensing scope of practice in 2012.
8. At the time, this qualification was accredited, subject to applicants satisfying the following requirements:
 - the qualification must have been conferred on or after 31 May 2009;
 - completion of the 'Perform Edge and Fit' module as part of the qualification (which at the time was an elective rather than a compulsory module for the qualification); and
 - submission of a completed and signed record of training book confirming evidence of a minimum of 800 hours' practical experience as specified in the record of training book, within 2 years of qualification or a period otherwise approved by the Board.
9. These requirements were consistent with both the competencies required for safe practice as a dispensing optician in Aotearoa New Zealand at that time and with training delivered by other providers graduating students with the prescribed Certificate IV qualification.

Proposal

10. It has come to the Board's attention, that as of July 2021, the RMIT University has announced the discontinuation of its Certificate IV in Optical Dispensing.
11. Currently, the Board recognises the accredited RMIT Certificate IV in Optical Dispensing qualification as a prescribed qualification for registration as a dispensing optician in Aotearoa New Zealand. It is listed on the Board's scopes of practice and prescribed qualifications, as published in the New Zealand Gazette, effective from 10 December 2020².
12. Due to the discontinuation of this programme (prescribed qualification), the Board is proposing to withdraw its accreditation for this programme. The Board will however continue to recognise the qualification for registration purposes for those who graduated from this programme for the time it was being accredited by the Board.

¹ Previously referred to as the Royal Melbourne Institute of Technology (RMIT).

² *Notice of Scopes of Practice and Related Qualifications Prescribed by the Optometrists and Dispensing Opticians Board 2020*, available at: <https://gazette.govt.nz/assets/pdf-cache/2020/2020-gs5669.pdf>

13. The Board therefore proposes to **REVOKE** the following prescribed qualification from *Notice of Scopes of Practice and Related Qualifications Prescribed by the Optometrists and Dispensing Opticians Board 2020*³:

“3. Dispensing Optician Scope of Practice

[...]

Prescribed Qualifications for Registration in the Dispensing Optician Scope of Practice

- *The applicant holds the qualification Certificate IV in Optical Dispensing (conferred on or after 31 May 2009), awarded by the Royal Melbourne Institute of Technology, or proof of eligibility to graduate from this course, has completed the “Perform Edge and Fit” module as part of the qualification, and has submitted a completed and signed record of training book showing evidence of the completion of a minimum of 800 hours of practical experience as specified in the record of training book, within two years of qualification or a period otherwise approved by the Board (Pathway 5 – “Dispensing Optician”);”*

Summary

14. In March 2022, the Board provided the details of the above proposal to RMIT University, including the reasons for the proposal. RMIT University did not object to the proposal by the due date.
15. Stakeholders are now invited to provide submissions on this proposed amendment.

How to have your say

16. If you wish to make a submission, please provide this in writing **by 5.00 pm on 7 July 2022**. The Board does not guarantee that submissions received at the Board’s offices after that date will be considered.
17. Submissions can be emailed to registrar@odob.health.nz, or submitted via post at:

The Registrar
Optometrists and Dispensing Opticians Board
PO Box 9644
Wellington 6141

³ Available at: <https://gazette.govt.nz/assets/pdf-cache/2020/2020-gs5669.pdf>