



Optometrists and Dispensing Opticians Board

24 November 2015

Alison Hussey
Senior Advisor, Nursing
Office of the Chief Nurse
Ministry of Health
PO Box 5013
Wellington 6145

Dear Ms Hussey,

Submission from Optometrists and Dispensing Opticians Board: Amendment to Medicines (Standing Orders) Regulations

Background

1. The Optometrists and Dispensing Opticians Board (**the Board**) is a responsible authority under the Health Practitioners Competence Assurance Act 2003 (**the HPCA Act**). The Medicines Amendment Act 2013, enacted in July 2014, provided optometrists with the same prescribing authority as nurse practitioners, medical practitioners, dentists, and midwives, in line with a policy to improve access to healthcare by removing barriers to health practitioners practicing to the full extent of their scopes of practice.
2. The Board notes that this consultation invitation did not include a proposal that the Medicines (Standing Orders) Regulations be amended to authorise optometrists to issue standing orders as well as nurse practitioners, despite numerous attempts by the New Zealand Association of Optometrists (NZAO) to have such an amendment made.
3. The Board notes that a review of the therapeutic products regulatory regime is underway and the Board has formally signaled its wish to be consulted with during this review.

Submissions

4. The Board **supports** the amendment of the Medicines (Standing Orders) Regulations to authorise Nurse Practitioners to be able to issue Standing Orders **now** rather than at a later date as part of the review of the therapeutic products regulatory regime. Please see the attached replies to the specific consultation questions posed.

5. The Board **encourages** the amendment of the Medicines (Standing Orders) Regulations to authorise therapeutically-endorsed¹ **Optometrists** (TPA Optometrists) to be able to issue Standing Orders **now as well** rather than at a later date as part of the review of the therapeutic products regulatory regime. The Board's reasons for this are as follows:

- TPA Optometrists are already bound by their scope of practice and the HPCA Act and are professionally responsible to undertake only those activities within their scope of practice, and within their knowledge and skill set.
- TPA Optometrists would use standing orders primarily for issuing instruction to non-TPA optometrists or suitably trained staff, and they are very aware of, and understand, the limitations of their peers' knowledge and skill in the administration of medicines.
- TPA Optometrists could also issue Standing Orders to other health professions, such as nurses, in the event of an outbreak of communicable eye disease such as conjunctivitis in a residential care or school setting where the infection could be contained and treated more effectively in accordance with the issued instructions.
- TPA Optometrists take their prescribing responsibilities as seriously as other authorised prescribers and understand the accountability for their prescribing decisions.
- Board monitoring of TPA optometrists prescribing has demonstrated that TPA Optometrists are safe and cautious prescribers, and they would apply this caution and adherence to safety to any Standing Order they issued.
- The policy platform for the Medicines Amendment Act 2014 and the ongoing Government commitment to making the best use of the health workforce alongside the HPCA Act provide sufficient foundation to progress the amendment needed to enable TPA optometrists to issue Standing Orders.
- Enabling TPA optometrists to issue Standing Orders will further mobilise the profession to work to the full extent of their scope of practice to support models of care that improve access for priority populations.
- Enabling TPA optometrists to issue Standing Orders will make the best use of the knowledge and skill of TPA optometrists and will further reduce the burden on other health care providers and free them up to deliver the right care at the right time to patients.
- Looking to the future, optometrists are increasingly employed in hospital settings and it would be prudent to ensure the necessary legislative changes are in place to ensure that hospitals are able to maximise the benefit of having optometrists working to the full extent of their therapeutic scope.

¹ 'Therapeutically-endorsed' refers to optometrists registered within a scope of practice that authorises them to prescribe medicines.

- Making the changes necessary to enable this now will not affect the long term regime change. In fact, it will enable the benefits of the change to flow through to health consumers in a more timely manner.

Yours sincerely



Damian Koppens
Chair
Optometrists and Dispensing Opticians Board

The contact persons for questions relating to this submission are:

1. Lindsey Pine, Registrar, Optometrists and Dispensing Opticians Board
2. Damian Koppens, Chair, Optometrists and Dispensing Opticians Board

Consultation on amendment of the Medicines (Standing Order) Regulations to enable nurse practitioners to issue standing orders

Please respond to the questions below.

Response from: The Optometrists and Dispensing Opticians Board

<p>1. What do you see as the potential benefits of an amendment to the Regulations to authorise nurse practitioners to issue standing orders now rather than as part of the review of the regulatory regime for therapeutic products?</p> <p>Nurse Practitioners will be able to work to the full extent of their scope of practice to support models of care that improve access for priority populations. Access to medicines will be improved in Nurse Practitioner led practice settings. Teamwork and efficiency between Doctors, Nurse Practitioners and Registered Nurses will be improved. In addition, this will see the best use of their knowledge and skill implemented and will reduce the burden on other health practitioners to deliver the right care at the right time.</p> <p>Why delay any of these benefits if they can be actioned now? Delay means patient care is not being optimised.</p> <p>The Board sees potential wider benefit for the public by an amendment to the Regulations to authorise optometrists to issue standing orders now as well – please see our accompanying submission document.</p>
<p>2. What do you see as the potential risks of an amendment to the Regulations to authorise nurse practitioners to issue standing orders now rather than as part of the review of the regulatory regime for therapeutic products?</p> <p>The Board does not see any risk by an amendment to the Regulations to authorise nurse practitioners to issue standing orders now rather than as part of the review of the regulatory regime for therapeutic products.</p> <p>The Board wishes to see the Regulations amended to authorise optometrists to issue standing orders now as well - please see our accompanying submission document.</p>
<p>3. Please provide examples to show the implications of an amendment to the Regulations to authorise nurse practitioners to issue standing orders now rather than as part of the review of the regulatory regime for therapeutic products?</p> <p>Please see the Board's response to question 1.</p>

The following documents can be accessed online

- Medicines Act 1981 www.legislation.govt.nz.
- Medicines Regulations 1981 www.legislation.govt.nz.
- Medicines (Standing Orders) Regulation 2002 www.legislation.govt.nz.
- Competencies for the Nurse Practitioner Scope of Practice <http://www.nursingcouncil.org.nz/Nurses/Scopes-of-practice/Nurse-practitioner>

Consultation

We seek your feedback on amendment to the Medicines (Standing Order) Regulations. Please use the response form in Appendix 1 to record your feedback.

Please send your feedback to:

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OR

Email: Alison_hussey@moh.govt.nz

Responses must be received by 5pm, **24 November 2015**.