

Susan Kelly
OCANZ
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Dear Susan,

Re: Review of Draft Accreditation Standards

Thank you for the opportunity to comment on the Draft Revised Accreditation Standards and Evidence Guide for Programs of Study in Ocular Therapeutics (October 2022). The Australian College of Optometry has delivered an OCANZ accredited stand-alone Ocular Therapeutics qualification since 2014.

1. Do you support retention of the basic form of the current OCANZ Standards (i.e., domain headings, an overarching standard statement for each domain, collective non-instrumental criteria and an integrated evidence guide)? If not, what would you change and why?

Overall, the ACO supports the retention of the current form of the standards. The overriding principles and the expectations on providers are clear. We are pleased that the evidence required under each standard has been maintained as a list of possible rather than all being compulsory (as in the UK). As a non-university provider of an accredited education course, the ACO does not have the same depth of resources that a more traditional university has access to.

2. Do you support the elevation of cultural safety related to First Nations Peoples (Aboriginal and Torres Strait Islanders and Māori) and their health care as a separate domain in the revised standards, as is now a feature of the entry-level standards? (This is likely to elevate the emphasis on the particular therapeutic needs of First Nations Peoples).

The ACO strongly supports the inclusion of cultural safety as a separate domain. Whilst not wanting to detract from the importance of consideration of cultural safety for First Nations People, we do ask whether consideration has been given to a broader view of cultural safety. This could include but is not limited to, providing care to refugees and asylum seekers, working with vulnerable populations, as well as LGBTQI+ communities. The reference to cultural competence on page 18 alludes to a broader base.

In Standard 2, under possible evidence, there is a mention about keeping documentation about how First Nations students are supported in the program. It is not clear if OCANZ is asking to institutions to provide additional or specific support to the First Nations students?

We also note that the definition of cultural safety provided in the OCANZ Glossary (page 26) only refers to Aboriginal and Torres Strait Islander peoples yet the standard clearly incorporates Māori populations.

3. Do the proposed OCANZ Standards give sufficient emphasis to new and emerging practices and therapeutic approaches and the related challenges that students and new graduates may face? (note that the likely horizon for these standards is five years or more)

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4. Do the proposed OCANZ Standards give sufficient emphasis to potential innovations in therapeutics practice and corresponding graduate capacities for adaptation and professional development?

The document does not seem to particularly emphasize an evolving field of practice, nor the challenges that may be faced. but it is written in a way that with updating of either competency standards or regulated scope of practice, the new standard will not prohibit or restrict education that supports changes in the profession

5. Do the proposed OCANZ Standards accommodate emerging trends in education methods (e.g., on-line learning, simulation) and changes to the health system (telehealth, record systems) sufficiently?

We feel that this standard supports innovation and change in the delivery of education.

6. Does the proposed OCANZ Evidence Guidance contain omissions, irrelevancies, ambiguities, obsolete items, confusing content or misleading items that should be addressed in the review?

The evidence guides are clear, appropriately prescriptive and relevant to each of the standards.

7. Are the 15 pieces of core evidence outlined in the Appendix to the Standards still appropriate?

The core evidence provides a sound basis to determine the education institutions capacity to provide education. The requirements are more than reasonable for the level of responsibility associated with delivering an accredited course.

Kind regards,



Jane Trevaskis

Director of Education, Membership & Marketing
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