

EXTENDED LIMITED PRESCRIBING AUTHORITY FOR OPTOMETRISTS

Statement about the *Application for Consideration of Extended Prescribing Authority* (the application) to the Minister of Health

- 1 The New Prescribers Advisory Committee (NPAC) has assessed the joint application for extended limited independent prescribing authority for optometrists, presented by the New Zealand Association of Optometrists (NZAO) and the Department of Optometry and Vision Science, Auckland University with official endorsement from the Opticians Board (the applicants).
- 2 We are satisfied that application meets the criteria necessary for extending limited independent prescribing authority.
- 3 The applicants have completed a significant amount of research on indications, contraindications and justifications for medicines on the indicative medicines list. We consider that optometrists are familiar with the noted conditions and have the training necessary to diagnose and prescribe appropriate anti-infective preparations and anti-inflammatory preparations. However, justifications for the inclusion of some glaucoma preparations are less well supported. Further expert advice regarding the indicative medicines list, possibly from the Ministry of Health, is required.
- 4 Under the suggested undergraduate and post-graduate training programmes, optometrists will be well qualified to prescribe competently although as post-graduate courses are yet to commence, there is some difficulty in assessing them. Ongoing competence requirements are covered satisfactorily.
- 5 The applicants define the scope of practice in some detail although further clarification of key parameters, including who can prescribe for whom and where, is needed.
- 6 The applicants provide detailed analysis of the submissions received on the consultation document and have consulted with appropriate stakeholders. There could have been greater consultation with Māori.
- 7 We are satisfied that the Opticians Board is supportive of this application. The Opticians Board will receive all correspondence pertaining to the application on behalf of the applicants.

Introduction

- 8 There are approximately 500 optometrists currently registered in New Zealand and it is anticipated that from 2006 all graduating optometrists would be qualified to prescribe. Currently there is a public perception that optometrists are able to prescribe a range of ocular

pharmaceutical interventions and the NZAO, the Department of Optometry and Vision Science and the Opticians Board have applied to extend limited independent prescribing authority to optometrists.

- 9 The NPAC presents the following advice regarding the application to the Minister of Health.

Background

History of the application assessment process

- 10 The Committee received the application on 12 February 2002. A Subcommittee informally reviewed the initial application on 7 March 2002 and raised concerns about the following areas:

- that the application was not submitted by the Opticians Board
- the inclusion of post-operative care medications and glaucoma medicines
 - the referral processes for the treatment of glaucoma
 - pharmacology education requirements especially for glaucoma treatment
 - continuing education and competency requirements
 - the administration of a register, and audit and disciplinary processes
 - the analysis of submissions on consultation document.

- 11 The applicants considered the Subcommittee's comments and resubmitted their application on 13 May 2002. The Subcommittee met again on 21 May 2002 and the application was referred to the full Committee for discussion.

- 12 At the Committee meeting on 17 June 2002, we agreed that advice should be presented to you.

Specific issues for consideration arising from the application

- 13 In addition to issues raised earlier in this report, we would like to comment on:

- the indicative medicines list
- the scope of practice
- the development of educational programmes and qualifications
- the lack of consultation with Māori.

Indicative Medicines List

Inclusion of medicines to treat conditions not included in the scope of practice

- 14 Some medicines included on the indicative medicines list, such as ciprofloxacin, are classified as specialist-only medications. To ensure that optometrist designated prescribers access the appropriate medicines, you may wish to seek further specialist advice from the Ministry of Health or other experts.

The inclusion of glaucoma preparations

- 15 Some preparations used to treat glaucoma, such as beta-blockers, are systemic and have a broad-ranging list of contraindications. A medical professional or designated prescriber supplying or administering such medications must know whether a patient has other health conditions and/or is receiving other pharmacological interventions. In this case, an optometrist may not have access to all relevant patient information needed to prescribe safely. We stress that communication between all health practitioners involved in the treatment of a patient is paramount to ensure that appropriate treatment is administered.
- 16 The Opticians Board, as the statutory registering body, is responsible for developing clear treatment guidelines and referral processes between optometrists and ophthalmologists to ensure complex cases of glaucoma are managed appropriately.

Scope of practice

- 17 Whilst the application contains detailed information regarding the prescribing parameters, settings, and client groupings, the scope of practice remains unclear. The scope of practice requires further definition regarding who can prescribe for whom and in which settings, in order to make it very clear as to the boundaries of the scope of practice. The applicants should undertake this work. The applicants may also wish to clarify what conditions or disorders are covered by the scope; what diagnostic tests may be used; appropriate treatment; referral process; and follow-up care mechanisms.

The development of educational programmes and qualifications

Currently registered and practising optometrists

- 18 The Opticians Board needs to develop a register indicating which optometrists are competent to prescribe during the transition period (2003-2006).
- 19 New Zealand has reciprocal practice agreements with Australia (where optometrists in some states have independent prescribing authority) and the United Kingdom. As such, optometrists granted prescribing authority in Australia could prescribe in New Zealand although optometrists from the United Kingdom would not be able to do so.

New graduates

20 From 2006, all graduating optometrists would be competent to prescribe ocular pharmacological interventions. We consider that undergraduate courses should offer greater clinical exposure to students regarding conditions where therapeutic prescribing could occur.

Consultation with Māori

21 The application shows little evidence of consultation with Māori.

Recommendations regarding the extension of limited independent prescribing authority to optometrists

Consensus

6 We did not reach consensus on the application. The main points of contention are:

- the inclusion of glaucoma preparations due to the complexity of the condition
- who should be responsible for the development of clinical guidelines covering optometrists working in this scope of practice.

Recommendations

7 The NPAC recommends that the Minister of Health:

- **Agree** that optometrists be granted limited independent prescribing authority and that they have access to the open Pharmaceutical Schedule but are limited to those medicines relevant to a defined scope of practice
- **Agree** that the applicant undertake additional clarification of the scope of practice for optometrists regarding who can prescribe where and for whom
- **Agree** that the Opticians Board further develop the register of optometrists with prescribing authority
- **Agree** that the applicants work with experts to further progress the indicative list of medicines
 - **Agree** that the applicants develop clinical guidelines to ensure that prescribing in an open environment has adequate clinical safety mechanisms.

8 The NPAC requests that:

- the applicants work with experts to further progress the indicative list of medicines

- the applicants ensure that all available evidence is considered in the development of clinical guidelines and clinical pathway development within the scope of practice.

