

## Consultation on amendment of the Medicines (Standing Order) Regulations to enable optometrists with therapeutic pharmaceutical agent's endorsement to issue standing orders

Please respond to the questions below.

1. What do you see as the potential benefits of an amendment to the Regulations to authorise optometrists with therapeutic pharmaceutical agent's endorsement to issue standing orders **now** rather than as part of the review of the regulatory regime for therapeutic products?

As with nurse practitioners, enabling optometrists to fully utilise their scope of practice will improve the efficiency with which health care can be delivered.

It is consistent with the current regulatory regime established by the Health Practitioners Competence Assurance Act 2003; there is no reason to delay removing an anomalous regulation which contradicts the Act.

2. What do you see as the potential risks of an amendment to the Regulations to authorise optometrists with therapeutic pharmaceutical agent's endorsement to issue standing orders **now** rather than as part of the review of the regulatory regime for therapeutic products?

No risks. Optometrists are authorised prescribers with the appropriate education, clinical experience and knowledge to be able to issue and monitor standing orders; practitioners working outside their scope of practice face disciplinary proceedings under the HPCAA. It will be important to ensure appropriate support and training is provided to optometrists as they undertake this new aspect of their role. The development of standing orders and the need for ongoing competency assessments of people administering medications under standing orders should be uniform in whatever setting it is happening in whether primary or secondary or tertiary centres.

We are not aware of many situations where optometrists would be issuing standing orders to nurses – possibly there is an opportunity for optometrists who run the diabetic photo screening could employ a nurse or ophthalmic photographer to run the photo screening and the optometrists review the photos.

3. Please provide examples to show the implications of an amendment to the Regulations to authorise optometrists with therapeutic pharmaceutical agent's endorsement to issue standing orders **now** rather than as part of the review of the regulatory regime for therapeutic products?

Feedback from one NZNO member (Nurse Practitioner, Ophthalmology) indicated that “standing orders development and issuing to ensure that designated ophthalmic staff working in a DHB are covered under the regulations to administer certain medications under standing orders has been a complex procedure. The development has involved consultation with pharmacy and then sign off by the clinical director.”

This would change if the proposed amendment to allow optometrists with therapeutic pharmaceutical agent's endorsement to issue standing orders directly was implemented. The process would be more straightforward and practitioner accountability more transparent. NZNO supports amending the regulations accordingly.

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- Medicines Act 1981 [www.legislation.govt.nz](http://www.legislation.govt.nz).
- Medicines Regulations 1981 [www.legislation.govt.nz](http://www.legislation.govt.nz).
- Medicines (Standing Orders) Regulation 2002 [www.legislation.govt.nz](http://www.legislation.govt.nz).
- Competencies for the optometrists with therapeutic pharmaceutical agents endorsement scope of Practice [https://www.odob.health.nz/cms\\_show\\_download.php?id=108](https://www.odob.health.nz/cms_show_download.php?id=108)

### 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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Responses must be received by 5pm, **26 February 2016**.