

GENERAL OPTICAL COUNCIL

Independent Prescribing - Amendments to GOC Rules

Introduction

1. Amendments have now been made to the medicines legislation to enable optometrists with an appropriate specialty annotation in the GOC register to independently prescribe medicines. These changes came into force on 4th June 2008.
2. In order to create the new specialty, GOC's Registration Rules need amending.
3. In November 2007, following consideration by the Standards Committee's Therapeutics Working Group, GOC consulted on a number of policy proposals as to how it intended to amend its rules to introduce the new specialty of independent prescribing for optometrists. It was proposed that, in addition to amendments to the Registration Rules, amendments were also made to the CET Rules to rationalise the CET requirements for those who hold more than one specialty in therapeutic prescribing (i.e. Additional Supply, Supplementary Prescribing, and Independent Prescribing) given the overlapping competencies associated with these specialties. The responses to the consultation were supportive of the proposals.
4. The draft rules were considered by Therapeutics Working Group on 12th June, 2008. The draft rules, as they stand, are appended – **Annex 1**. At the time of writing this paper final clearance on the rules had not been given by the Department of Health, although this will be established before the meeting of Council. If there are any changes to the rules as set out in the Annex as a result of amendments required by the Department, these will be circulated to members in advance of the meeting.
5. A summary of the proposed changes is outlined below.

New specialty

6. It is proposed that the Registration Rules are amended to create a new specialty for registered optometrists - independent prescribing specialty. The rules will describe the work and activities permitted for those with register entries as independent prescribers in the following terms:

The prescribing, administration or giving of directions for the administration of medicinal products that are –

(a) for the treatment of ocular conditions affecting the eye or adnexa; and

(b) specified in article 3 of the Prescription Only Medicines (Human Use) Order 1997

other than those that are controlled drugs or for parenteral administration.

7. The rules will make clear that where a registrant undertakes such work or activity without having the specialty, this shall be treated as adversely affecting their fitness to practise.

Practical Experience

8. It is proposed that the Registration Rules are amended to require those applying for the specialty to include details of the applicant's practical experience relating to the work and activities of an independent prescriber.

9. The rules will provide for the registrar to make an entry onto the register of the specialty only if they are satisfied that the applicant has had adequate practical experience relating to the work or activities of an independent prescriber. The registrar may remove the specialty from a person if they are not satisfied that they have adequate practical experience (or do not otherwise meet the requirements).

Continuing Education and Training

10. It is proposed that the CET Rules are amended to allow for those with multiple therapeutics specialties (additional supply, supplementary prescribing, independent prescribing) to effectively treat these as a single specialty for the purpose of calculating CET points. Those with one or more therapeutics specialty will have to gain the number of points equivalent to half the number of whole months in which they have held any such specialty during a CET 3 year cycle. For example, if a person has held both supplementary prescribing and independent prescribing specialty for 12 months during a CET cycle, they will be required to gain 6 CET specialty points by the end of the cycle, and not 12 points which would be required if the two specialties were treated separately (i.e. 6 points for each specialty).

11. As the rules are to be introduced mid-way through a CET cycle, and the rules cannot apply retrospectively, the above method of calculation only applies to the period for which the specialties have been held after the new rules have come into force. Before the rules come into force, for the purposes of calculating the number of points required, each therapeutics specialty will have to be treated separately as they are under the current rules. Thus, if the new rules come into force on 1st August 2009, and a registrant has held both additional supply specialty and supplementary prescribing specialty for 6 months prior to the 1st August, when the number of points required is calculated for the entire cycle, they will need 6 specialty points with respect to this period within the cycle (3 points for each specialty). Thereafter, they can treat each specialty as a single specialty for the purposes of calculating points, but only for the period after 1st August. Thus, if they continue to hold the specialties for the remainder of the CET cycle – a further 16 months until 31st December 2009 – they will be required to obtain 8 specialty points for this period. By the end of the CET cycle they will need to have obtained 6 specialty points for the period prior to 1st August 2009 and 8 for the period afterwards, a total of 14 specialty points.

12. The rules will make clear that the above applies for the purposes of calculating the total number of points for an entire CET cycle, and not when CET points are gained

within that cycle. In other words, there is no requirement that the number of specialty points relating to the period prior to the rules coming into force need to be obtained during that period, only by the end of the entire CET cycle.

Tidying up amendments on contact lens fitting

13. It is proposed that the Registration Rules and the Contact Lens (Qualifications Etc.) Rules are amended to make it clear that optometrists do not need a specialty in contact lens fitting in order to fit contact lenses, and that dispensing opticians who are training to gain contact lens specialty may fit contact lenses. These are tidying up amendments only, and do not change the current position.

Council is asked to make the amendments to the Registration Rules, CET Rules, and Contact Lens (Qualifications Etc.) Rules.