



SAOA

South African Optometric Association

27th April, 2020

TO : lockdowncomments@cogta.gov.za

TO WHOM IT MAY CONCERN

SOUTH AFRICAN OPTOMETRIC ASSOCIATION (SAOA) RESPONSE TO THE SCHEDULE OF SERVICES TO BE PHASED IN AS PER COVID -19 RISK ADJUSTED STRATEGY TO BE IMPLEMENTED AS OF 1 MAY 2020: LEVEL 4 COMMENT

We thank the Committee for the opportunity to submit our views in response to the schedule of services to be phased in as per COVID-19 Risk Adjusted Strategy to be implemented as of 1 May 2020 with specific reference to Level 4.

The following represent our comments, as requested.

Optometric Services

Within the context of a declared national disaster, the role of health care professionals has been restricted to attending to emergency situations in accordance with Regulation 11A. From an optometry perspective, services rendered have been limited. As per the guidelines issued by the Health Professions Council of South Africa, practitioners were entrusted to apply their professional judgement as to patients to be consulted and treated, where applicable. The increased risk of exposure to infection versus the benefit of treating patients at practices was an obvious key consideration.

The lockdown imposed on the South African population in the combat against a highly contagious and deadly organism gave rise to many thousands of South Africans forced to work from home. For those with vision disabilities, the lockdown has introduced a special set of circumstances. Working in isolation effectively is almost entirely reliant on the ability to see and read. This also has particular relevance for home schooling. The dependence on technology becomes amplified in a lockdown situation with communication channels taking the form of emails, WhatsApps, social media etc.

Although essential services are well defined in Regulation 11 A, with an emphasis on personal safety, under the circumstances, the definition of emergency is in need of review. For those who are in need of a vision aid, for those who have lost or broken their spectacles, this represents catastrophic consequences due to functionality and productivity being severely compromised.

Level 4

The shift from Level 5 to Level 4 is well understood. The lockdown persists but with specified sectors and industries able to go to work. The general population are to stay at home but with personal movement restricted to (eg) the purchase of food, visits to health facilities, such as pharmacies and clinics. There is also reference to the well-being of communities and preparation for the winter cold (eg clothing).

Interestingly, within Level 4 within the category of Health and Welfare, reference is made to “medical and veterinary services” as sub-groups. Based on the explanation within the Framework of Sectors document, specified references to sub-groups excludes other sub-groups within the same division or sector

Standard Industrial Classification

We acknowledge the reference to the Standard Industrial Classification (SIC) s within the Framework for Sectors document, as published by Statistics South Africa, as the reference base for the various industries. In this regard, it is to be noted that the profession of Optometry falls with the Health Services Sector. It is thus understood that all references to Health or Health Services, as a broad division therefore incorporates Optometry. Nevertheless, by simply incorporating the term, ‘medical’ within the Health and Welfare category does introduce the need for clarification, at this time, and moving forward. At the outset, the it was announced by the Minister of Trade and Industry that health professionals need not apply for certificates to travel to and from practices; more recently, during a briefing, media were advised that the health care sector was already back at work with the implication that this situation would be unaffected by the introduction of Level 4.

In the spirit of this submission, in response to the proposed regulations relating to Level 4, the following requests are submitted for the consideration of the Committee.

1. Clarity regarding the specific health care professions which fall into the categories of ‘medical services’ (rather than health services) as well the types of clinics which fall into the category of ‘health facilities’
2. Should restrictions continue to be imposed on the profession of optometry in terms of services that should be rendered, we respectfully request that this be reviewed to benefit those in need. At all times, this request assumes adherence to stringent safety and hygiene precautions and consideration for the health risk/patient benefit ratio.

SAOA Position To Combat the Spread of the COVID 19 Virus

As frontline (primary) health professionals, with ethical obligations to patients, Optometrists should use their professional discretion to determine the necessity and timing of eye and vision care, including assessing patient expressed urgency. The following guidelines are intended to assist the practitioner to continue to run his/her to practice, by adapting aspects of the practice to reduce the likelihood of contracting or spreading the virus, for the benefit of practitioner, family, staff and patient.

- **Practitioners should open practices only to attend to those patients needing prompt attention, as per professional judgement of the Optometrist.**
- **Patients should be allowed access to practices, one at a time, to be seen by appointment only.**
- **Patients and staff in the practice must religiously adhere to social distancing, as regulated at all times (2 m apart)**



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- Ideally, practices should remain open for short periods.
- For larger practices, practitioners are reminded that one third of your staff compliment are allowed in the practice at any given time.
- Practitioners are to exercise extreme caution regarding comorbidity and older patients.
- We strongly recommend that practices strictly observe safety protocols and guidelines which include wearing a medical mask by practitioners and cloth masks for staff and patients at all times, with rigorous sanitisation procedures. Detailed guidelines will follow.
- Where physical consultation does not appear advisable or where practices remain closed, practitioners may assist and/or advise patients via the principles of tele-health and may charge for such consultations, using the SAOA code 11041.
- Print your HPCSA card and keep it with your person at all times, especially when travelling.
- Please note that SAOA COVID 19 website is live and loaded with all recent updates - www.saoacovid19.co.za

We note the extreme difficulties and challenges facing the professions of Optometry and Dispensing Opticianry from so many perspectives, during this difficult time. Our views, as expressed above, are based on the health of our colleagues and all who come into contact with them underpinned by the preservation of life to be considered above all else.

MR DOLLARS BOLOKA
SAOA PRESIDENT