

From: \_\_\_\_\_  
 To: \_\_\_\_\_  
 Cc: \_\_\_\_\_  
 Subject: Standards for general and limited registration  
 Date: Thursday, 8 September 2011 8:51:49 PM

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Dear sir,

Our staff have considered the OBA "Consultation for registration standards" dated 5 August 2011 and have the following comments.

1. Table 1 (and text) is the flow diagram for overseas trained entrants to Australia. This flow diagram needs to show equity to our local graduands who will be therapeutically endorsed from 2013. What Table 1 proposes is that from 2014 applicants without therapeutic training will have 2 years to achieve therapeutic competency and those overseas entrants with such training will have 1 year to do likewise. This seems a reasonable approach but some concern was expressed regarding unscrupulous businesses treating this period as a vehicle to import foreign trained optometrists on the "holiday" basis during the 2 (or 1) year grace period without ANY intent for undertaking therapeutic training.

*Proposed modification.* The 1 year or 2 year periods describe above are ONLY approved on receipt of course registration for a course or examination (for the 1 yr person) that must commence within 1 year of the application. This will demonstrate the *bona fides* of the applicant and sponsor to achieve therapeutic training. (NB the 1 year person only needs to apply for an OCANZ exam and pass it so this must be done in the year period).

2. The existing sunset for local trained optometrists is 2029. We find this a unnecessarily generous period that will simply act to promote a mentality of non conforming. We propose that it should be 2024 which allows a 10 year window for local people to retire or conform.

*Proposed modification.* A 2024 sunset date be adopted instead of 2029 to allow 10 years for last graduates to achieve therapeutic qualification. On the OBAs figures this will require upskilling of about 150-180 practitioners per year which is well within the capacity of existing training facilities across all states. We feel that the OBA can reconsider this date closer to time and delay it if educational expectations are not realized.

If you have any queries regarding our comments or suggestions please feel free to contact me for clarification.

Best wishes, Algis,

Professor Algis J Vingrys PhD FARVO

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