



4th of March 2011

Dear Colin Waldron and the Optometry Board of Australia,

Please find following the NSW/ACT board response to the questions that you posed in the correspondence dated the 20th of January 2011.

Is there public benefit in requiring all optometrists to be eligible for therapeutic endorsement?

Yes. The public would benefit from having practitioners with a wider range of skills to consult. The public purse would also benefit from the reduction in consultative duplication. A shift in the public perception of optometrists' skills would be a positive by-product, which would hopefully create more efficient service delivery and more timely and appropriate referrals. These benefits are likely to be further enhanced in rural and remote areas.

Is such a requirement a reasonable expectation of optometrists?

The OAA board NSW is of the opinion that it is reasonable to expect all newly graduating optometrists to hold this qualification and that it is reasonable to encourage currently registered optometrists to broaden their skills and gain the qualification.

The NSW board *does not* feel that it is a reasonable expectation that all optometrists hold the qualification in the near future, as there are many currently registered and practicing optometrists who would not find a therapeutic endorsement attainable or relevant to their mode of practice.

Should therapeutic qualification be a requirement for practice as optometrists in Australia?

Eventually yes, however the NSW board does not believe that it is reasonable to expect that all currently registered optometrist obtain the qualification to retain their registration.

We expect that there will be a period where we effectively have a two tiered profession until the passage of time reduces the number of non-therapeutically qualified practitioners (as has previously been the case with diagnostic drugs).

It is however a desirable outcome to have all optometrists equally qualified to provide a consistent standard of care to the public, but progress in the scope of the profession means that there will often be practitioners qualified at different levels in new competencies.

If so, should there be a period of grace to allow all registered optometrists to gain the necessary qualifications and how long should the period be?

The NSW board feels that currently registered optometrists should be able to continue to practise in their current mode until they chose to retire.

Whilst we want to provide encouragement to the current practitioners to seek the additional training, we do not wish to disenfranchise currently registered optometrist, or give them the impression that they would be a "second class optometrist" without the endorsement.

NSW board believes that a reasonable grace period to the point of "therapeutic endorsement" vs. "non-therapeutic" registration (as opposed to the current registration *plus* therapeutics) is greater than 10 years. A likely junction is when the number of therapeutically endorsed optometrists is greater than non-therapeutically endorsed optometrists.

To be consistent with Australian graduates, should overseas-trained optometrists applying for general registration in Australia for the first time be required to complete appropriate competency assessment for therapeutic practice from 2014?

Yes. Newly admitted optometrists, be they new graduates or an overseas transfer, should be required to meet a common “entry level” standard. They should not be required to gain any additional competencies over and above those required for “general” registration. However we would suggest that there is ample opportunity given to the overseas practitioner to gain any additional training necessary to bring their qualification in line with Australian standards.

Should optometrists holding general registration in non-clinical roles, such as management, administration, education, research, advisory, regulatory or policy development roles be required to hold therapeutic qualifications?

The NSW board is of the opinion that a practitioner should meet the standards of general registration irrespective of their mode of practice.

Therefore, if they are currently registered and do not intend to practice in a clinical setting, it would be appropriate for them to continue to practice as they currently do and to hold a “non-therapeutic” endorsement.

However if the practitioner is a new graduate or new entrant to Australia, who wishes to specialise in non-clinical areas it would be reasonable to expect that they do hold a therapeutic endorsement.

Are there impediments to the proposal that need to be considered and if so, can these be overcome?

Yes. Primarily, the impediment is accessibility to the training course and clinical placements. The cost of undertaking training and the time out of work also pose a significant barrier for many practitioners.

Sincerely,

Lara Foster
OAA NSW President