

Subject: Submission re therapeutic endorsement requirement for registration
Date: Monday, 14 February 2011 12:54:23 AM

Dear Board,

Here are my comments as a registered optometrist regarding the consultation document on proposal for therapeutic qualification to be included as a requirement for general registration.

- 1) I do not believe it will benefit the public to require all optometrists to be therapeutically endorsed. This is because to do so will remove many very competent optometrists who do not wish to do ocular therapeutics. This would result in fewer eyecare practitioners hence it would cause a negative impact on the general eye health of Australia.
- 2) I do not think such a requirement is reasonable to expect from all optometrists. Optometry is a multifaceted discipline, it would unfairly treat competent optometrists who have no interest in therapeutics.
- 3) I do not believe that we should make therapeutics a requirement to practice as an optometrist in Australia without a "grandfather" clause for optometrists who are already registered or have been registered in Australia previously.
- 4) I do not believe existing optometrists should be forced to become therapeutically endorsed.
- 5) I do believe all new applications for registration from 2014 should be required to be therapeutically qualified (note this excludes those who are re-registering)
- 6) In no way should optometrists holding non clinical roles be required to hold therapeutical qualifications as I see absolutely no public benefit from this requirement.
- 7) The main impediments will be practitioner reluctance to becoming therapeutically qualified and lack of course resources to cope with the number of practitioners doing the course. I do not believe these impediments can be overcome.

In summary, my thoughts are that the requirement as stated in the consultation document will impose an unjustified burden on those practitioners who would need to go through the course and ultimately cause a negative benefit to the public as it loses the services of those practitioners who decide not to become therapeutically qualified.

Regards
Barry Gock BOptom (UNSW)