

2<sup>nd</sup> February, 2011

Colin Waldron  
Chair of Optometry Board of Aust  
GPO Box 9958  
Melbourne VIC 3001

Dear Mr Waldron,

Thank you for your welcome to the National Registration and Accreditation Scheme and invitation to respond to public consultation on the therapeutic qualifications requirement for registration of optometrists.

I appreciate the board's role in protecting the public by ensuring that only optometrists who are suitably trained and qualified to practice in a competent and ethical manner are registered.

I will address the posed questions.

1. I believe there is only a very small public benefit in requiring all optometrists to be eligible for therapeutic endorsement. It would be a matter of convenience that they may not have to see another practitioner for a prescription.

This would be out weighed by the inconvenience of not being able to get an appointment while the optometrist is absent completing the course and studying.

2. It is reasonable to expect new graduates to have this ability since it is in their course.

3. Since it has now been made a part of the course it must become a requirement for those graduating under the new course.

4. The optometrists qualified under this provision need to have it as part of their requirements but not those that have qualified under previous courses. The previous course holders should have their continuing education requirements maintained.

5. I am not aware of the details of overseas courses and hence can not comment.

6. Optometrists holding non clinical roles should be required to or not to depending on the course they did to qualify.

7. Not if it is left as it is.

I have practiced for over 30 years and I am sure to the satisfaction of many patients over the years. I have never had any issues or complaints with my practice methods. I have always practiced in an ethical manner.

I had three practices and now work as a locum and am never out of work. I would like to indicate that the many practices that employ me as a locum would prefer my non therapeutic, good refractioning and good ability to detect any diseases to any recently graduated therapeutic trained optometrist.

If this became a requirement I would cease to practice and find employment in another field.

I would object strongly to being forced to complete a course that was not a requirement for my successful professional practice for the past 30 years and would be proactive in joining others in the same situation to fight this enforcement.

Yours sincerely,

Judith Irvine