

3rd February 2011

Optometry Board of Australia
AHPRA

Dear Sir/Madam,

I am writing to formally submit my response to the proposed mandatory therapeutic requirements for optometric registration.

In response to the questions made by the board, I would like to make the following comments:

- 1. I strongly disagree that there is any public benefit in enforcing a mandatory requirement for all optometrists to have therapeutic qualifications. I have been in practice for over 20 years and have never had any difficulty in diagnosing and consequently using my allied professionals to treat any ocular conditions.*

There are many ophthalmologists and general practitioners who optometrists work with every day and in this partnership, work effectively in treating the public efficiently and accurately. This system has been in place for decades and has worked very efficiently over the years with no evident problems. I strongly feel that if optometrists were to take on this extra role, it will only hinder the good relationship we have with our allied professionals. As well as crossing

over into territory which is already being amply covered by ophthalmologists and general practitioners.

2. I disagree that therapeutic qualifications are a reasonable expectation of optometrists. In fact it will place undue pressure on existing optometrists both financially and in terms of available time needed to complete the qualifications. I am a part-time worker who has a young family and elderly parents. The time that will be needed to devote to the study of this qualification would put undue pressure on my family life and create undue stress upon myself. I am sure there are many women and men in optometry who are in this same predicament.

If it became mandatory, I strongly believe that it would unfairly discriminate against many optometrists who do not have these qualifications. In fact, I feel, it would probably force many optometrists out of the profession as they may not have the financial capabilities or the available time to devote to this area of study. This would therefore have a negative impact on the community as it would result in a shortage of optometrists as they would be either unqualified or would be forced out of the profession.

It is presumptuous to assume that all would have the capabilities to devote to furthering their qualifications considering that these professionals have been

honouring their role above and beyond what is expected of them to this date.

- 3. I would like to reiterate my strong views against the mandatory requirement of therapeutic qualifications for the practice of optometry, as I have stated before, I do not feel there is any real benefit to the community and would most certainly have a negative impact for existing optometrists and the community as a whole.*
- 4. A period of grace would not be of any benefit because it would discriminate against currently registered optometrists, who have been working with the current system without any impact on the community and who provide an efficient and excellent service to the public.*

I feel that slowly as more optometrists become therapeutically qualified, it would move the profession naturally in this direction, without the unnecessary need of enforcing mandatory requirements and thus creating negative impacts. Until this occurs, I propose that different levels of registration should exist.

- 5. Overseas-trained optometrists should be consistent with Australian graduates in their training if they wish to work in Australia from 2014.*
- 6. There would be a need for various levels of registration as many optometrists do diversify in to non-clinical*

roles within the profession. The benefit in providing different levels of registration assists those who are performing these vital roles that are non-clinical in nature. Non-clinical roles I believe do not have to hold therapeutic qualifications unless they wish to clinically supervise therapeutically endorsed optometrists. Optometrists who do wish to provide this service, would of course need to complete the qualifications and subsequently apply for a different registration.

7. Many professions have different levels of qualifications that do not impact negatively on their profession and the community. Why is this not possible to be introduced within the optometric profession? Making therapeutics mandatory would only create a negative impact on the community with very little benefit for all. I do not see why there cannot be different levels of registration for different levels of qualified individuals within the profession. This will allow therapeutics to slowly filter in to the existing conditions of the optometric field. This would be the most logical, most reasonable and the least negative impact on all.

Please take the time to consider my comments and thoughts regarding this matter, as I strongly believe, after discussions with my colleagues, that I hold a similar opinion to many of them. I would like to reiterate my views that any mandatory requirement of therapeutic qualifications would have a very strong

negative impact on the profession and our allied professional relationships and on the community as a whole. Any therapeutic qualifications should be of a non-mandatory nature.

Yours sincerely,

Optometrist