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Strachan Eyecare

www.strachaneyecare.com.au

ABN: 13 877 118 368

Greg Strachan BScOptom FACO
Sue Strachan BScOptom FACBO FACO
Christa Sipos-Ori MOptom
Petra Hurleston BScOptom FACO
Colette Parkinson BOpt(Hons) TPA

□ 17 North Blackburn Shopping Centre
66 Springfield Road
BLACKBURN NORTH 3130
Ph: 9878 9095 Fax: 9894 0320
strachaneyecare.bb@bigpond.com

□ 4/399 Belmore Road
BALWYN EAST 3103
Ph: 9857 9375 Fax: 9857 4939
strachaneyecare.ba@bigpond.com

Mr. Colin Waldron
Chair
Optometry Board of Australia

24/01/2011

Dear Colin,

As a practicing Optometrist of 30 years with therapeutic endorsement since 2003, I wish to make a few points on the Board's consultation document on the proposal for therapeutic qualification to be included as a requirement for general registration.

As you are aware I have 15 years plus involvement in the Optometrists Registration Board of Victoria. I was chair for the last six years of the Boards existence. The ORBV lead Australia in obtaining therapeutic rights for Optometrists, so I feel I have some understanding of the issues involved in your Board's proposal. I would like to say up front that whilst I understand the OBA's motives I see this proposal as a little premature.

Issue 1. Training and manpower

Currently you say that 800 Optometrist are therapeutically endorsed in Australia. This represents less than 25% of all Optometrists. I would have thought that had the figures been reversed (say 75% endorsed optometrists) that this proposal would have had more merit.

Has the Board given any thought to how the remaining 3200 Optometrists can become endorsed. Assuming all schools in Australia can provide a post grad course there is the potential for say 100-200 per year (this is an over generous estimate). At this rate it would take 16 years plus to educate the optometrists to the required level. Currently there is not the man-power to provide the education required over a short time line. Schools would need to increase capacity and organizations such as the OAA would need to develop courses to help meet the demand.

Assuming some Optometrists may not wish to take up this onerous training, there may well be a loss of manpower to the profession should the OBA make this compulsory.

Recommendation: Should the OBA adopt this proposal, it should not be made compulsory for non-therapeutic Optometrists and those that choose should be allowed to continue in their mode of practice until retirement. This could be facilitated by installing a long time frame for compliance

Issue 2. Public benefit

You ask is there a public benefit for this proposal. More importantly is there a risk to the public. It is the Board's duty to protect the public. To date my experience tells me no member of the public has been harmed through an unendorsed Optometrist not having therapeutic training, so forcing all Optometrists to undertake therapeutic training has limited public benefit.

I see this proposal as being unreasonable at this stage and a unnecessary strain on the public purse and the profession.

As with the introduction of diagnostic drugs to the Australian Optometrists competencies, those without diagnostic drugs were allowed to continue practicing and I'll stand to be corrected on this but I understand

there were a few still practicing when National Registration commenced last year. These Optometrist were/ are being allowed to Grandfather out of the profession.

The process as it stands at the moment is working. The Board must understand that the vast majority of Optometrists in Australia are currently unendorsed. Forcing them to re-educate could create some unrest in the profession and potentially lead to a legal challenge. A slower more conservative approach to this issue is recommended. Slowly as practitioners age and retire, new therapeutically endorsed Optometrists graduate from the schools. Therapeutic endorsed optometrists will become the majority. Then and only then should the OBA consider this proposal.

As far as overseas Optometrist are concerned, I recommend business as usual. If they pass the OCANZ theory and practical examination they obtain General Registration and to gain Therapeutic Endorsement they need to pass a therapeutic examination. There should be no different standard applied to overseas trained Optometrists as that applied to Australian trained Optometrists as it may be looked on as discriminatory.

Whilst I understand the Boards direction on therapeutics I cannot stress too strongly how premature I see this proposal.

Yours sincerely

A handwritten signature in black ink, appearing to read "Greg Strachan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Greg Strachan
Therapeutic Optometrist
Former Chair, Optometrists Registration Board of Victoria