

03/10/2011

Submission to Optometry Board of Australia: Re: Draft Registration Standards

**I am fundamentally opposed to the proposal that all Optometrists must have therapeutic qualifications in order to be Registered after 2029.**

- 1) There appears to be a misguided and unfounded belief that there is a danger to the community if all Optometrists do not have therapeutic training. This is nonsense. I ask the Board to provide statistical proof that there is a risk to public safety from the current system of eyecare that has served the community well for over 50 years.
- 2) There is more risk to the public if patients are misdiagnosed and incorrectly treated by inadequately trained Optometrists, compared with referral to medically trained doctors or specialists in eye disease.
- 3) I practice in a suburban area with 25 GP's within a 1km radius, and 7 Ophthalmologists within a 3km radius. I have excellent "first name" relationships with these GP's and Ophthal's and my patients are better served by referral to a more highly skilled specialist. Why would I undertake training for a qualification that I would never use? I doubt I would ever know enough to be comfortable prescribing therapeutics.
- 4) Remember that 80% of Optoms are NOT endorsed now. Therapeutics has been taken up by very few experienced Optometrists because it has clearly been shown to be unnecessary and of no benefit to patients or optometry practices in the vast majority of cases. It really is only of significant community benefit in remote rural areas where access to GP's or Ophthals is difficult. Optoms with therapeutics use it so infrequently that their practical experience is severely limited. Therapeutic training is a significant impost on the existing Optometrist population in terms of time and cost, for insignificant benefit to patients or Practice viability.
- 5) There are massive problems in providing adequate therapeutic training to optometrists in the present situation and there are insufficient course providers for this to improve. How can we be guaranteed that commercial interests will not take over the provision of this training at the expense of Optometrists?
- 6) This proposal would force hundreds of Optometrists out of practice. This fact alone is unconstitutional and un-Australian. No other professions have similar policies. It is not appropriate to use the "retirement" argument as many of these Optoms would continue to serve their patients well even if they only worked part time. This proposal should not be foisted on Optometry when it is not required. These sorts of draconian measures should only be undertaken if there is unequivocal proof of a significant public risk.
- 7) The Board should accept that by natural attrition, most if not all Optometrists would eventually be therapeutically endorsed. The Board should not penalise those who do not undertake therapeutic training by removing their career, their profession, their livelihood, and their ability to serve their community in a well proven safe and appropriate manner.

Yours Sincerely

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Optometrist