

Subject: Therapeutic as a requirement for general registration.
Date: Wednesday, 2 March 2011 11:04:44 PM

TO THE OBA,

Re: therapeutic qualification to be included as a requirement for general registration for optometrists.

There should be no requirement for therapeutic qualification to be included as a requirement for general registration by the year 2014.

Reasons:

- 1) There has not been a demand for optometrists to be required to have this certification from the public, or government, or medical community.
- 2) Certification to use therapeutic drugs is very new in the most populous state N.S.W, it is simply too early to assess public benefit of this requirement, especially in metropolitan areas.
- 3) Existing Optometrists should be free to practice with therapeutic qualifications but not be compelled in any form to practice this way. Such inappropriate compulsion would be threatening a lower grade of registration (non -general), as many optometrists have other areas of interest which serve the majority of their patients, eg. Behavioural optometry, advanced contact lens fitting, industrial optometry etc. Existing optometrists should continue to have general registration, whether or not they are therapeutically endorsed.
- 4) It is wrong to compel existing optometrists to obtain therapeutic endorsement for general registration when the training is not fully available in their state, eg. NSW optometrists need to travel to Hobart to complete their practical component at Hobart Hospital. This is an unreasonable demand for those committed to full time practices and who have families. It is also too costly and an unfair demand. Issues regarding affordable and convenient training must be addressed before such demands are made on general registration. This training needs to be fully accessible for existing optometrists in their own state. A fair period needs to be given to allow development of all these training places in each state. A more appropriate time period for changes to general registration requirements would be the year 2020, not 2014. To demote existing optometrists to another form of registration is poor treatment as existing optometrists have shown themselves to be competent in the diagnosis and appropriate care of their patients needs.
General registration should have 2 categories: those with and those without therapeutic

endorsement.

5) It is reasonable to require overseas trained optometrists applying for general registration in Australia for the first time, to have competency assessments for therapeutic practice from 2014 as this would be consistent with the training of Australian and New Zealand new graduates by 2014.

Yours Faithfully

GARRY LILLEY (OPTOMETRIST)