To the Optometry Board of Australia

I wish to share my view of the draft registration standards

I graduated from Optometry in 1981.

I completed the Diagnostic Drugs course in 1983

I completed the Therapeutics course run by UNSW and Pennsylvania College of Optometry in the second group to do so, in around 1992, and achieve a mark around 90%. I followed up with the refresher courses run 2 years later. The knowledge gained in these courses has been among the most useful I have found in clinical practice.

I began the new therapeutics course 2 years ago, but was unable to continue it because I found it was too large an undertaking for me, given the life circumstances in which I find myself.

I maintain my continuing education in excess of the the requirements by a factor of double, triple or more of the minimum amount. I value it and enjoy it. I currently devote most my new learning to be at the forefront of new areas of Behavioural Optometry, whilst still maintaining a healthy broad based Optometry education.

By the time 2029 comes, and I simply maintain my registration at my current level, I will have had 48 years of experience in the profession of Optometry which I am quite passionate about.

The new draft legislation however indicates to me that in the view of the Board, that at that point, I will no longer meet the standards required to be registered.

- I do not believe that the Board should be empowered to register and Optometrist who meets the standards based on his qualifications at one point, then change the level of qualifications required at a later point. I am not referring to continuing education, but having met the minimum education standard at one point, it should entitle that person to remain registered, if he does not fall breach of the various ethical and other bylaws.
- I do not believe that the Board should be choosing one speciality (
 Therapeutics) within Optometry, over and above all other, and make
 additional qualifications in that particular area a requirement for
 registration. You should consider further qualification in Behavioural
 Optometry, Contact lenses, Low Vision, Industrial Optometry etc of equal
 importance, and have all Optometrists be endorsed for every speciality or
 none of them for registration. Choosing one is discriminatory. In my view, I
 see the board as perhaps loosing sight of what Optometrist core "business"
 is about- it seems to me we are trying to be like Ophthalmologists before
 we are experts in our own core fields like binocular vision.

Kind regards

Mark Falkenstein