

Subject: proposed therapeutics issue
Date: Monday, 14 February 2011 11:09:14 AM

Attn Colin.

I have been working on a submission in response to your request for comments on the issue of compulsory therapeutic endorsement. To date the matter has evolved into over 10 pages of documentation.

I have been doing extensive research especially combing the legislative records in the US. Regrettably the information is coming quite slowly and I am not sure I can complete this before the submission date.

However, two issues are immediately apparent.

1. There is no equitable or practical way that compulsory therapeutics for registered optometrists can be functional by 2014. If nothing else educating 3000 or so practitioners in that time just can't be done. To date the minimum period of grace in the US appears to be 5 years (but in fact 7 since the changes were flagged up to 2 years before the actual notification became official)
2. Since the Board is in a unique historical position to set the rules for the long term, it is obvious to me that the issues you now canvass are but the surface of a whole complex of issues. Some examples are (in no order) ongoing v entry competencies, competency requirements of overseas applicants for registration, the sensitivity analysis of the results of the Board's decision(s), precedents from other jurisdictions, quality of continuing professional development (at present the requirements are almost totally quantitative) and legal aspects of non compliance.

My suggestion is that the Board postpone this process and instead obtain a (or some) position paper on possible future internally consistent and applicable rules.

I would appreciate an acknowledgement of this email

Keith Masnick Ph.D.
Visiting Fellow
School of Optometry and Visual Science
University of NSW