

Colin Waldron  
Chair  
Optometry Board of Australia  
AHPRA

Dear Mr Waldron and the Optometry Board of Australia,

Following is my submission regarding the proposal for therapeutic qualifications to be included as a requirement for general registration as an Optometrist.

1. I feel that as there is already approximately 20% of all currently registered Optometrists with therapeutic qualifications and since from 2014 all new graduates will have therapeutics endorsement then the proportion of therapeutic trained to non therapeutic trained will steadily grow. Hence, there will be no public benefit in enforcing all Optometrists to have therapeutic qualifications as public access will in itself increase due to the increasing new graduate intake.
2. Enforcing such a requirement is not a reasonable expectation as many older, experienced Optometrists and part timers/casuals do not have the time nor the inclination to undergo such an indepth study process and cannot leave their practices to undergo the endorsement.
3. Therapeutic qualifications must not be a requirement for practice as an Optometrist in Australia by Australian graduated Optometrists but overseas - trained Optometrists should equal the qualification of Australian new graduates.
4. Registered Optometrists should be allowed to practice as they see fit albeit with focus on continuing education but enforcement of therapeutic endorsement in its current format should not be mandatory. It is too long, too indepth and too costly.

Your sincerely,  
Andrew Kyriacou,  
B.Optom