Dear Sir or Madam  
Re: The proposal for therapeutic qualification to be included as a requirement for general registration:

I do not believe there is any public benefit in requiring all optometrists to be eligible for therapeutic endorsement at this time. In my experience, most members of the public are not aware of therapeutic endorsement. In the area where I practise, there are many GPs & a public clinic, so there is not a problem in sending patients to them if appropriate. An urgent appointment with an ophthalmologist is only a phonecall away. He is within walking distance. The situation is obviously very different in remote areas.

The requirement is not a reasonable expectation of optometrists. I have argued for at least 15 years against therapeutic endorsement. It is not the type of optometry I wish to practise. I intend to retire in 2 to 7 years & I work part-time. It would not be economically viable for me to do the course, and yet I feel I have a lot to offer my patients.

I don't believe therapeutic qualifications should be a requirement for practice as an optometrist in Australia, however, if this became the case, a grace period of at least 5 years would be reasonable.

To be consistent with Australian graduates, it is reasonable for overseas-trained optometrists applying for general registration in Australia for the first time to be required to complete appropriate competency assessments for therapeutic practice from 2014.

There is no need for therapeutic qualifications in the case of management, administration & research, but in the case of education, advisory, regulatory or policy development roles, it is reasonable for these people to be educated to the same level as new graduates. Again, a grace period of at least 5 years would be reasonable.

The major impediments to this proposal are the time & money required. Not all optometrists are in the financial situation to be able to take time away from their practice & also pay for the training.

Yours sincerely

Marion Fowler