The board has clearly identified that from 2014 there will exist two levels of practice within the profession, namely those with and those without therapeutic qualification. Such a situation is not unique as the profession was similarly stratified when the use of diagnostic drugs was incorporated into undergraduate training in the 1980s.

The key questions are therefore;

1) Should pre 2014 registered practitioners be forced to undertake therapeutic qualification?

Having been involved in optometric education for nearly thirty years one may assume that I would be in favour of mandatory therapeutic training for post graduates. This is certainly not the case. As a present therapeutic candidate at UNSW I believe the current course poses an unacceptable impost to optometrists who do not wish to practice therapeutics or senior practitioners approaching retirement. Forcing such practitioners to undertake this training would not be in the public interest or in the interest of the profession.

Conversely not all new graduates who are therapeutically qualified will wish to avail themselves of this training for a variety of reasons. This is analogous to ophthalmologists who elect not to perform surgery.

While therapeutic legislation represents a significant advancement for the profession and is to be commended it is not core to the practice of optometry.

2) What should be the position for overseas practitioners registered on or after 2014?

Quite simply overseas practitioners wishing to register in Australia or New Zealand should demonstrate the same entry skills to the profession as those of the University graduates of the day. From 2014 this should include therapeutic qualification. Excluding such practitioners from the need to have therapeutic qualification would only serve to unnecessarily increase the period where the profession is divided between those with and without therapeutic qualification.

3) Will there exist and education divide between those practitioners who are and are not therapeutically qualified that is detrimental to the public interest?

The thrust of most therapeutic CPD continues, justifiably, to be aimed at the appropriate diagnosis of ocular disease. To prevent increased stratification of the profession between the diagnostic skills of those with and without therapeutic qualification the Board could consider broadening the requirement to have a certain percent of CPD education to be in therapeutics to include all practitioners.

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