

Sent: Wednesday, 10 November 2010 8:26 PM

Subject: Request for comment - Consultation document on proposal for therapeutic qualification

Dear

Thank you for the opportunity to comment on the above document.

Now that the registration of optometrists is undertaken on a national basis, consistency of qualification can be monitored and maintained at the highest standard.

It is in the public interest for all optometrists to be trained to the highest standard and at a consistent level around the country in order that they have access to the best possible treatments.

In order to maintain consistency of training and standards of practice, the Optometry Board of Australia should set the minimum requirement for all registered optometrists to hold a therapeutic qualification. This should be a standard for all Australian and overseas trained optometrists.

In order to allow those optometrists who do not currently hold a qualification in therapeutics to become trained to the minimum standard, it would seem appropriate to allow them until 2014 (when those optometrists who are currently studying will graduate with the therapeutic component in their primary qualification) to achieve the required standard.

Those optometrists holding general registration but practising in non-clinical roles could be given an exemption from the therapeutic requirement, however, they would need to have a condition placed on their registration which restricts their practice to non-clinical work and they would also need to be clear that they cannot move into undertaking clinical practice until they have achieved the required therapeutic qualification/training.

With regard to the actual therapeutic training, the following queries are raised:

Are there institutions offering therapeutic training which would be sufficient to allow optometrists to gain the required standard?

Are the costs to undertake such training prohibitive?

How long is the training?

If 80% of current registrants do not hold the therapeutic endorsement, the OBA will need to ensure that a program of advice to registrants is commenced soon to allow those 3,200 (approx) registrants to source places to undertake the training over the next 3/4 years so as to ensure they can meet the required standard for continued registration.

Does the OBA need to consider developing an examination in this respect?

Could the training in therapeutics count towards an optometrist's CPD requirements?

What would the OBA's attitude be to those optometrists who fail to achieve the minimum standard?

If you have any queries, or need clarification please do not hesitate to contact me.

Yours sincerely

Australian Health Practitioner Regulation Agency
G.P.O. Box 9958 | Perth WA 6001 | www.ahpra.gov.au