

COLIN BATES & ASSOCIATES PTY. LTD.

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Submission to the Optometry Board of Australia regarding therapeutic endorsement.

With reference to the questions in the Consultation Document:

- 1) There is a public benefit for optometrists to be eligible for therapeutic endorsement. Optometrists are better able to diagnose and treat ocular conditions than general medical practitioners as their knowledge and instrumentation is capable of providing a more accurate assessment of ocular conditions. This makes treatment more effective and reduces the cost to the community by reducing referrals to ophthalmologists.
- 2) As recent graduates in optometry are trained in therapeutics, it is becoming reasonable to expect more optometrists to be therapeutically endorsed. However, optometrists trained some years ago should not necessarily be expected to obtain therapeutic qualifications.

The time taken and cost of obtaining therapeutic qualifications means that not all practising optometrists can achieve this goal.

- 3) As graduates and new optometrists are registered to practise after 2014 it should be mandatory for them to have therapeutic endorsement, to ensure that the best standard of practice is available to patients.
- 4) There should be a period in which previously registered optometrists have the opportunity to gain therapeutic endorsement. As 20% of optometrists have therapeutic endorsement at present, it will be some years before the whole profession can realistically be expected to obtain the appropriate qualifications. If it is assumed that 100 therapeutically trained optometrists graduate each year and that a similar number of non-therapeutically trained optometrists will retire each year, normal attrition would mean the goal of total therapeutic endorsement would take about 30 years. It could be unrealistic to allow such a long time frame for change. A period of 15

years would seem a possible time frame. By then 1500 new qualified graduates would be in the work force taking the total number of therapeutically endorsed optometrists to 2300 or almost 60% of those in practice. It could be expected that the 40% of previously registered, "unqualified" optometrists could achieve endorsement over the same time to give a fully "qualified" profession. The actual logistics of this process would depend on how expeditiously "unqualified" optometrists could be trained to the required standard.

- 5) Overseas trained optometrists applying for registration for the first time should be expected to have qualifications equivalent to those of new graduates. There should be an expectation that overseas graduates are therapeutically trained from 2014.
- 6) It is desirable that all optometrists would eventually be therapeutically qualified. Those involved in education could be expected to hold such qualifications in order to adequately teach under-graduates. To this end they should be required to have such qualifications earlier than the rest of the profession, preferably by 2014.

Some educators, teaching in areas without any therapeutical implications e.g.: optics, may not need therapeutic qualifications, but would be expected to acquire them over the same time frame as the rest of the profession. Other categories listed in the consultation document would also be expected to achieve qualification over the same time frame as other members of the profession.

- 7) The main impediment to the proposal is time. As indicated above in (4) the number of optometrists needing to achieve qualification to have the whole profession therapeutically qualified to be registered make the goal a long term one.

A two tiered registration system will need to be in place for many years while older optometrists either retire or gain qualification. Those "unqualified" optometrists with an expected professional "life" of say 15 or more years would need to be advised to obtain qualification or face being unregistrable after 2030.

The cost of obtaining qualification could be seen to be amortised over the period until therapeutic qualification was mandatory.

Alternatively, the profession could accept that a two tiered registration system be put in place, without any compulsion to gain therapeutic qualification for existing optometrists until therapeutic qualification gradually filtered through the system. This would appear to be after about 30 years based on the assumptions above.

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