

2/2/2011

Colin Waldron

Optometry Board of Australia

AHPRA

Dear Colin Waldron,

**RE: Proposal for therapeutic qualification to be included as a requirement for general registration**

Firstly, I am a practicing optometrist for the last 18 years. I undertake continuing education constantly as anyone should in a truly professional role. I work in a small independent practice in the middle of the CBD, Melbourne. The proposed changes would impact my practice significantly.

I **strongly** object to the proposed changes for the following reasons:

1. There is very limited public benefit for the majority of Australians. Our current public/private health system is one of the best in the world. Therapeutic endorsement of optometrists has never been essential considering the readily available MEDICAL professionals at our disposal. Optometrists that want this qualification can choose to do so at their expense if it makes them feel better. I suggest that if these individuals want to behave like general practitioners or ophthalmologists they should follow their dreams and go and complete an endorsed Medical Degree. These individuals represent an OVERWHELMING MINORITY (20%). Why should 80% of currently registered optometrists be subjected to unnecessary qualifications (on their own time and expense)
2. It is a totally unreasonable expectation of optometrists, considering the current system is working well. I welcome any healthy debate on this issue.
3. If you believe that the current registration requirements pose a danger to the public, why stop at requiring therapeutic endorsement. Let's make the profession obsolete and require everyone to complete Ophthalmology. That would surely solve the problem.
4. Therapeutic endorsement has been OPTIONAL in the past and should remain optional in the future. I ask the question again. Why is there a need to change the current system? I would like to see real studies done to show how therapeutic endorsement improves public health outcomes. I think you will find great difficulties in achieving this.
5. For a change in the registration requirements I believe firstly you need to demonstrate a CLEAR risk to public safety and secondly have proven measures to rectify the problem. I do not believe you have either.

I understand the difficulties concerned with two levels of practice within the profession on your behalf. That unfortunately is NOT a good enough reason to subject 80% of the currently registered optometrists to undertake therapeutic qualifications.

This as you well know is a time consuming and costly process. I suggest (to be fair) that **anyone** that will directly profit from this change be excluded from the decision making process. (ie The educators ). Otherwise, it is a clear conflict of interest.

Thank you for taking the time to read this objection and I welcome any public debate on this topic.

Kind regards,

Harry Georgakas BScOptom