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**Subject:** submission for optom consultation document  
**Date:** Friday, 11 February 2011 5:19:09 PM

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Dear Sir/Madam

I am writing this email responding to the current proposal for therapeutic qualification document.

In response specifically to the sample questions you would like addressed, I have outlined the answers below.

I can see very, very little benefit for the public, for all optometrists to be therapeutically endorsed. As with almost all industries/professions, there are specialties or areas of their business for which one professional may have experience in and a similarly qualified professional may have had little exposure to. This is the norm. For example, you can find a lawyer specializing in criminal law, general law, family law, planning law, corporate law etc etc. Do you have an endorsement with their titles? Also as with just about any qualification, it changes over time. Do you think that what was taught at law school will be identical to what is taught nowadays? Do you think anyone that holds a Bach of Business have all studied the same subjects and all have similar knowledge once graduated, yet they all fall under the same Bachelor degree? I think not.

This requirement for therapeutic training for registration is not reasonable. This is making optometrists all have the specialty" of Therapeutics. Although this is what is offered at University now. However what do you think will happen to those optometrists who have their own special interest in behavioural optometry, binocular vision and therapy, sports vision therapy, low vision, contact lenses etc. What happens when the public consults an optometrist for a low vision assessment and the optometrist doesn't know what to do"since they have not had the exposure to this "speciality".

It is absolutely ludicrous to make optometrists gain therapeutic training so as to maintain practising as a general optometrist. If only 20% of optometrists have now got this endorsement it is making a VERY BIG CALL to think that 80% will be therapeutically qualified by the end of the decade. I cannot see this happening. Please don't forget it was almost 20 years ago that the first optometrists started doing the first offered therapeutics training that has initiated this change. If after this many years still only 1 in 5 optometrists have taken the full step to get fully endorsed, then this is a very slow change. I understand the new optometrists graduating will be therapeutically qualified however I do not understand how you have possibly calculated 80%. I therefore question that there will be indeed this high percentage holding therapeutic training and therefore strongly have to question if the board is "jumping in too early" to make in fact sweeping changes to the industry.

Two similar situations exist right now in the optometric profession.

1. Currently there are a small percentage of optometrists who cannot use diagnostic drugs. However they are still and have been for a long time given general registration as an Optometrist. This is no different to what we are considering now? If it is seriously thought that those optometrists are a disadvantage to the public, they would not have survived as Optometrists to date.

2. While I practised many years in the UK, I was working alongside a reasonable amount of older optometrists that were not trained to fit contact lenses even though the younger optometrists were later taught at University. These "non qualified" optometrists remained in a normal practising environment with general registration, and I could not see any issue this posed for the public. The employer set up their practice around what the optometrist could or could not do, or else the employer did not employ them and if a patient required contact lenses, communication and a simple explanation did wonders and I cannot think of a dissatisfied or grumpy patient yet if they were explained the situation.

As I have said the industry in the real professional world will determine if therapeutics is a necessity. If an employer will not offer a position to a non trained optometrist, then they will be forced to further train themselves. However I strongly see that the industry will change in many other ways over the next decade and I strongly believe it is too early and too limited to just focus on therapeutics.

And lastly and again, it is absolutely **WRONG** to include therapeutics as a requirement for general registration.

Yours sincerely

Karen Gunsar

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