

Submission on Therapeutics requirements for optometrists  
Feb 1 2011

Thank you for the opportunity to provide feedback on the proposal that therapeutics endorsement become mandatory for national optometric registration.

As an optometrist with 17 years work experience and not therapeutically endorsed I'm keen to give my opinion on this matter. I will attempt to address the questions listed on the request for comments document.

1. I do not think there is a significant public benefit in requiring all optometrists to be therapeutically endorsed. In my suburban practice I have little trouble referring to local ophthalmologists or colleagues who are therapeutically endorsed. My other issue is the number of people I see who would benefit from therapeutic treatment is limited. Even with endorsement, I would worry that the infrequency of my need to use therapeutics would mean limited experience and concern over capability. I can certainly see the benefits in rural practice and in areas where ophthalmological cover is low.

2. I believe this requirement is not a reasonable expectation of optometrists. If, as an undergraduate, one receives therapeutic training then the qualification is a given. As a part time practitioner, the cost involved and the time out of work I believe is prohibitive. This also calls into discussion, the argument of inadequate remuneration for optometric consultations through Medicare. At the limited, capped fees imposed on optometry I don't feel seeing patients who need therapeutic treatment is financially viable.

3. I don't believe therapeutic qualification should be a requirement for optometric practice in Australia.

4. If it does become required there should most definitely be a grace period to achieve qualification. As for the time frame, I would like to suggest indefinite to allow for retirements and career changes. I realize this probably isn't practical and would hope instead that it doesn't become compulsory to be therapeutically endorsed.

5. If this does become a requirement then certainly overseas optometrists

should show competency in therapeutics. If we retain a dual registration then no.

6. This questions is difficult to answer as it depends on the individuals role. Certainly optometrists involved in university education should be endorsed. I don't believe optometrists in management or admin. roles need be.

7. I feel the best way to overcome the above mentioned issues, is to allow for natural attrition of non therapeutically endorsed optometrists. Why can't the registration continue as it is currently with therapeutically endorsed optometrists recognised as such? Otherwise I feel a two tiered registration is needed.

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