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**Subject:** Submission on the proposal for therapeutic qualification as a requirement for general registration  
**Date:** Tuesday, 25 January 2011 9:26:18 PM

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**Submission relating to the proposal for therapeutic qualification to be included as a requirement for general registration.**

I have been an Optometrist for two decades. I satisfied the requirements of the undergraduate course and I have maintained and advanced my knowledge over the past 20 years in order to best serve my patients. For this reason I am deeply opposed to the proposal that therapeutic qualification becomes a requirement for general registration.

I submit the following reasons for opposing the proposal:

A) I never wanted to be a medical practitioner. The definition of an Optometrist has not changed in my 20 years, and I abide by the definition which applied when I chose to join the profession..

B) In 20 years there has only been one instance where having therapeutic qualifications would have been useful. This was a single incident and in the very middle of rural Queensland.

C) The added responsibility increases litigation risk and our premiums will increase. Those wishing to use their therapeutic qualification will have to fund the increase. I do not want to pay more for insurance as a result of qualifications I won't ever use.

D) The Ophthalmologists have objected all the way to our changes. We have finally achieved a relative peace and we don't invade each other's territory too much. If therapeutic qualification became a mandatory requirement, the relationship with Ophthalmology will sour and we will have ruined decades of progress.

E) The Federal Government will review the Medicare provisions for the prescription of medications and find that a consultation for a refill is not worth the equivalent time of an Optometrical Subsequent Consultation, and will create a six minute fee for Optometrists.

F) Lots of Optometrists do not want to go back to study. They will resign from the profession leaving a dramatic shortfall in both the workforce and experience.

G) So far 800 of 4000 practitioners have decided to qualify for therapeutics. If you intend to make the course compulsory, can you provide, at a reasonable cost, facilities to train 3000 Optometrists in one or two years?

And finally...

H) A change as major as this is beyond the scope of a few opto-politicians. Any attempt to unilaterally redefine our profession without a binding referendum or a change in federal legislation (and possibly each individual state's legislation) would be met by a legal challenge, tearing our profession apart and making us all look bad in the media.

This submission, including my name, may be published.

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