

**SUBMISSION TO THE OPTOMETRY BOARD OF**  
**AUSTRALIA ON THE “CONSULTATION DOCUMENT**  
**ON PROPOSAL FOR THERAPEUTIC QUALIFICATION**  
**TO BE INCLUDED AS A REQUIREMENT FOR**  
**GENERAL REGISTRATION”**

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**Mode of practice:** Practicing Optometrist  
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**Date:** 16<sup>th</sup> February 2011

In this submission I shall address the specific questions asked by the Optometry Board.

**1) Is there any public benefit in requiring all optometrists to be eligible for therapeutic endorsement?**

There appears to be little or no benefit to the public in requiring all optometrists to be therapeutically endorsed. The following points appear pertinent:

- Provision of health services should be appropriate to the needs of the community. Since the vast majority of patients seeking optometric services do not require the provision of therapeutic drugs, any move to make all optometrists therapeutically qualified would appear unjustified. Non therapeutically qualified practitioners are able to deal with the great majority of people requiring optometric examinations and where patients require therapeutic drugs; onward referral to appropriately qualified colleagues, ophthalmologists or general practitioners provides an entirely satisfactory solution. In short any requirement for all optometrists to be therapeutically qualified would not be in line with current or expected service needs.
- Since the diagnostic standards for therapeutically endorsed and non-therapeutically endorsed practitioners are the same, requiring all optometrists to be therapeutically qualified does not offer any advantages in terms of patient safety or the detection and diagnosis of eye disease. This is reflected in the Optometry Association of Australia's "Competencies for Optometry", which are essentially the same for both modes of practice, except for the actual prescribing of medicines and other issues directly related to the treatment of ophthalmic conditions.
- Currently only about 20% of optometrists registered in Australia are Therapeutically endorsed and there does not appear to be any evidence that the public's needs for ophthalmic medicines are not being met, so there appear to be no grounds for compelling all practitioners to be therapeutically qualified.
- Any requirement for all optometrists to become therapeutically qualified would be likely to cause a significant number of practitioners to retire or leave the profession prematurely, which would reduce the total number of practitioners. This could cause a workforce shortage which would inevitably increase the cost of optometric services and reduce the public's access to them. Given historical trends, this would be likely to have a disproportionately large effect on rural and remote areas. Requiring all newly arrived overseas optometrists to be therapeutically qualified would also be likely to have a similar negative impact on the availability of optometric services.

## **2) Is such a requirement a reasonable expectation of optometrists?**

Whilst a significant number of existing optometrists have opted to obtain therapeutic qualifications voluntarily, the additional study and examinations required to obtain these takes a considerable amount of time and can be expensive, especially when the cost of time away from practising is taken into account. Whilst I support those practitioners who have elected to obtain these qualifications, not all optometrists wish to prescribe therapeutic drugs, so I would consider any requirement for everyone to be qualified in this way to be onerous. I believe that any proposal along these lines would be unreasonable and likely to cause a significant number of practitioners to leave the profession, especially in the older age groups. Not only would this be undesirable for the public, but the impact on the livelihoods of individual practitioners and business owners who would be disenfranchised by such a measure would be considerable and unfair, given that they can, and currently do, practice safely without a therapeutic endorsement.

## **3) Should therapeutic qualifications be a requirement for practice in Australia?**

No, in view of the fact that there is no benefit to the public in requiring all optometrists to be therapeutically qualified (see question 1) and such a requirement would be onerous on practitioners (see Question 2). Any such requirement is likely to be counter-productive, due to the impact on the workforce.

## **4) If so, should there be a period of grace to allow all registered optometrists to gain the necessary qualifications and how long should the period be?**

Given that I do not believe a therapeutic qualification should be required, this question is irrelevant. However, if the Board decides to make this qualification mandatory, a period of grace would be essential. It would be impractical to require huge numbers (potentially thousands) of optometrists to obtain this endorsement immediately and any attempt to impose the requirement in this manner would over stress the educational system and have disastrous effects on the workforce as large numbers of practitioners may be unable to work while waiting to be accredited. In fairness to existing practitioners, I feel that this period of grace should last at least 10 years from the imposition of the requirement for therapeutic qualification (i.e. 2024 at the earliest).

**5) To be consistent with Australian graduates, should overseas trained optometrists applying for general registration in Australia for the first time be required to complete appropriate competency assessments for therapeutic practice from 2014?**

If the intention of the Board is that eventually all optometrists practicing in Australia should be therapeutically qualified, then clearly all overseas trained practitioners entering the country would have to be therapeutically endorsed. That way, with the retirement of the non-therapeutically endorsed optometrists, the entire profession would become therapeutically qualified, without needing to impose a requirement to gain additional qualifications on people already practicing in Australia.

However, given that there is no demonstrable public need for everyone to practice therapeutically (see question 1), it is doubtful if it is justifiable to require overseas trained practitioners to complete a therapeutic competency assessment. There is a significant risk that restricting entry of overseas optometrists in this way could cause workforce shortages, especially in rural areas. It appears that the disadvantages of any proposed requirement for new migrants to be therapeutically qualified might outweigh the potential advantages.

**6) Should optometrists holding general registration in non-clinical roles, such as management, administration, education, research, advisory, regulatory or policy development roles, be required to hold therapeutic qualifications?**

There seems little value in requiring practitioners in non clinical roles to hold or obtain an additional qualification that they will not be utilising in practice. However, certain positions, especially in the education sector, may necessitate such a qualification if the subject matter is of a therapeutic nature. This is really more of an issue for the bodies or organisations hiring such individuals, rather than a matter for the registration authorities, especially where there is no direct clinical involvement.

**7) Are there impediments to the proposal that need to be considered and if so, can these be overcome?**

As you will see from the previous answers, I feel the main issue with any proposal to require all optometrists to be therapeutically qualified is whether the whole concept is necessary, justified and fair to practitioners. Given that it is unlikely to improve patient outcomes or safety, I really think that this proposal should be dropped and the status quo remain.