

Subject: Therapeutics for optometric registration
Date: Monday, 28 February 2011 2:44:10 PM

Please find enclosed my comments on therapeutic qualifications as a requirement for registration of optometrists.

1. I do not believe that there is any public benefit in requiring all optometrists to be eligible for therapeutic endorsement. Many optometrists practise in circumstances with very easy access to ophthalmologic and general medical care, and are happy to be part of the community's team of health care providers. There is a public risk if all optometrists are required to be therapeutically endorsed, but then through routine optometric practice, lack exposure to ocular conditions requiring advanced expertise.
2. Such a requirement is not a reasonable expectation of optometrists as the courses (for already registered optometrists) are difficult to access. The timing of lectures, training and clinical patient exposure seem somewhat awkward (and sometimes haphazard) and the courses are expensive, especially here in Victoria.
3. Therapeutic qualifications should not be a requirement for practice as an optometrist in Australia.
4. I don't think all registered optometrists should need to gain the necessary qualifications for therapeutic practice.
5. I am undecided whether overseas trained optometrists applying for general registration in Australia for the first time should be assessed for therapeutic practice. If we have a two-tier registration system, and lack numbers in our workforce, perhaps we should welcome practitioners who can help Australia.
6. Optometrists practising in non-clinical roles should not be required to hold therapeutic qualifications.
7. Impediments to the proposal for therapeutic qualification to be included as a requirement for general registration are: (i) The time required to train currently registered optometrists (ii) Financial costs of training, both in course costs and in time out of practice (iii) Currently 80% of Australia's optometrists do not hold therapeutic endorsement. To rule that they are not competent to practice optometry will cause disruption to the provision of eye care to the Australian community by barring from practice the majority of the profession.

Yours Sincerely,
Pamela R Sutton

Optometrist without therapeutic endorsement but 30 years experience.