



13 December 2010

Mr Colin Waldron
 Chair, Optometry Board of Australia
 G.P.O. Box 9958
 MELBOURNE VIC 3001

Dear Mr Waldron

Proposal for therapeutic qualification to be included as a requirement for general registration

The Pharmacy Board of Australia considered the Optometry Board of Australia's consultation paper at its 26 November 2010 meeting and the request for comments on questions raised in the paper. I am pleased to provide the following comments on behalf of the Board:

1. Is there any public benefit in requiring all optometrists to be eligible for therapeutic endorsement?
 In general, the Board is of the view that there is public benefit in requiring optometrists in clinical practice to be eligible for therapeutic endorsement.

2. Is such a requirement a reasonable expectation of optometrists?
 Such a requirement is a reasonable expectation of new entrants to the profession.

3. Should therapeutic qualification be a requirement for practice as an optometrist in Australia?
 It is the view of the Board that therapeutic qualification should not be a requirement for practice as an optometrist in Australia because not all optometrists are in clinical practice given the definition of practice in the registration standards.

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?
 A grace period is not required for the reason provided in point 3.

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

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

Optometrists holding general registration practising in non-clinical roles such as management, administration, education, research, advisory, regulatory or policy development roles should not be required to hold therapeutic qualifications.

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

The impediment to the proposal that needs to be considered in the opinion of the Board is the capacity for practitioners to up skill.

I hope the Board finds this feedback helpful.

Yours sincerely

Chair