

Subject: Proposal for therapeutic qualifications  
Date: Tuesday, 1 February 2011 3:56:42 PM

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To whom it may concern.

I am a practising optometrist. Graduated in 1999, and working in my own private practice since March 2003.

As a young self employed optometrist I have no problems with the the push towards therapeutics. However my concerns are below:

1)- Is there the required infrastructure and systems in place to train and qualify existing optometrists to have therapeutic qualifications? My personal belief is that any practical training requiring Ophthalmology experience and supervision will not be able to cater for the demand. From the information in the discussion paper states currently only 20% of optometrists are therapeutic trained. **How can the other 80% be trained before 2014?**

2)- For practitioners in regional areas (and even the central coast of NSW (90mins north of Sydney)), will there be local or correspondence training available. Even though the UNSW is best set up for the training, surely it is unrealistic that this is the only training centre. Particularly if a persons registration and ability to earn a livelihood depends on this training. The current digital technology may help with training by correspondence.

3)- It may be the view that optometrists having therapeutic training is in the public interest, however this brings extra responsibility for the optometrist; requiring extra insurance and costs. At a stage where the average GP doesn't bulk bill and Medicare consultations by ophthalmologists attract a higher fee, it seems only logical that the Medicare fee for an optometrist consultation should increase. Even though the board is not Medicare (and does not control Medicare), an undertaking must be gained that the Board will submit recommendations to Medicare when fees are being revised along this nature.

As stated above, I am not against the increasing standards to gaining optometry registration. But when "retro-educating" and raising the bar for some one who has a 4 year Bachelor degree, maintained all required continuing education standards in the past and practices their profession 43 hours a week, **flexibility and systems** must be in place **before** changes are made and requirements for registration are changed.

Yours truly,

Simon Della Vedova (B.Optom UNSW)