

**Subject:** Optometry Board of Australia request for comments: proposal for therapeutic qualification to be included as a requirement for general registration  
**Date:** Saturday, 29 January 2011 7:58:02 PM

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Mr. Colin Waldron  
 Chair  
 Optometry Board of Australia

**RE: request for comments on the proposal for therapeutic qualification to be included as a requirement for general registration as an optometrist**

I will address each question, one through seven, in brief form.

1. **Public Benefit:**

- ease of explanation (ie: all optometrists can care for your eye infection, foreign body etc.)
- ease of access (ie: there would be approximately 4000+ more places nation wide where a member of the general public could access therapeutic eye care)

2. **Reasonable Expectation:**

- Yes. it is a reasonable expectation. Although, I currently believe most optometrists would still seek ophthalmological advice on potentially serious outcomes.

3. **Should Therapeutics be a Requirement?:**

- Yes, in the long run. A future where all Australian optometrists are therapeutically qualified is inevitable.

4. **Period of Grace:**

- Yes, there should be a period of grace. Those who graduated 1994 (a 20 year period from 2014) and more recently should have to undertake therapeutics training with a period of grace of approximately 10 years.
- a "grandfathering" clause should exist for pre 1994 graduates whereby they are not required to undergo mandatory therapeutics training, but could undertake training if they so wished.

5. **Over-seas Trained Optometrists applying from 2014:**

- All over-seas trained optometrists should have therapeutic training endorsements if expecting to practice in Australia from 2014, as this will be the standard by which all Australian graduates are assessed. That is, if you wish to

practice optometry in Australia, you will be required to meet the graduate criteria in place at that time.

6. **Optometrists in Non-clinical Settings:**

- No. All optometrists graduating and hopefully, all overseas entries will be therapeutically qualified from 2014 anyways. So, people currently in non-clinical roles should be able to operate under the "grandfathering" clause. Naturally, some of the listed areas will require therapeutics as a necessary knowledge base for their area of expertise, thus making therapeutics part of the job procurement requirements in their chosen field.

7. **Impediments:**

- Significant teaching resources will be required to teach, practically train, and assess approximately 3200+ optometrists (this is all the currently unqualified plus any over-seas optoms who need therapeutics training) in therapeutics who are not yet qualified. If the period of grace is insufficient to accommodate all comers, there is a risk of deregistration resulting in inability to work until the therapeutics requirement is met. This will make for some very unhappy campers!
- Consideration needs to be given to the human nature aspect of leaving things to the last minute, and the inevitable rush to qualify by the prescribed due date what ever that may be.
- Consideration on implementing a "grandfathering" clause may alleviate some of the burden on teaching resources and direct these resources to the people most likely to use the required training.

Yours sincerely,

Toby Dale  
optometrist