

Subject: Consultation document on proposal for therapeutic qualification to be included as a requirement for general registration
Date: Friday, 28 January 2011 8:18:07 AM

Dear Sir / Madam,

I have read the proposal and here are my comments addressing each numbered point:

1) I do not feel there is any public benefit in *requiring* all optometrists to be eligible for therapeutic endorsement. Forcing unwilling Optometrists into qualifying therapeutically does not make those individuals competent prescribers capable of treating ocular pathology.

2) I am currently completing the graduate certificate on ocular therapeutics as I personally have an interest in it and still have a lot of my career ahead of me. However, the cost of the qualification is such as to make it arguably prohibitive for many members of the profession such as part-time workers. I myself am a mother and have just returned to the workplace 2 days per week, the qualification cost has taken a hefty chunk out of my salary which I can barely justify. It would be unreasonable to expect some members of the profession to stand \$8000+, an example of this would be people close to retirement.

3) I think if you wanted to make therapeutic qualification a requirement to **register** in Australia, that would be a reasonable requirement. I do not think a therapeutics qualification should be a **requirement** for practice for those who are **already currently practicing** here.

4) N/A as my answer was no to the previous question.

5) I think if you wanted to make therapeutic qualification a requirement for overseas Optometrists to register in Australia, that would be reasonable providing you make provision for overseas qualified Optometrists to enrol in the current therapeutics courses available at a reasonable cost. I am not an Australian resident (though I live in Australia) and I had a real fight trying to get on the QUT therapeutics program despite having passed the OCANZ examinations. I also had to pay international fees for the privilege! It is very difficult to fit into another country's mode of practice with no training in how it works as I have found re. general Optometry already: I passed OCANZ, but still frequently find myself in situations where I don't know what the best course of action is or how to find out what it is, because the system here is so different from the UK where I trained.

6) No. This would be a huge waste of everyone's resources and ultimately would put the public at risk. If people in these positions were required to hold a therapeutics qualification that they had never used, they could end up in situations where they had no experience to manage a condition, but they did have the qualification so in theory they have a duty of care to manage it.

7) I see one major impediment: not all Optometrists want therapeutics qualification and a lot are quite scared by the idea of having that responsibility. If as a profession we are keen to become "universally qualified" in therapeutics (which would incentivise and enable the profession to move forward) then we need to **encourage** all members of the profession to qualify in therapeutics, **not require** this of them. Having a qualification like this enforced on you doesn't

give you the experience and confidence to use it well. Providing affordable and accessible training with good support both during **and after** qualification would better encourage individuals to take on this qualification and use it more frequently and more accurately than any compulsory ruling will. More accurate usage by all qualified individuals will raise the standard of the profession as a whole which will in turn reinforce our standing as a therapeutically qualified profession.

An example would be to hold a majority of the training course as internet lectures (using available software such as Webex), making a lot of the theory correspondence rather than requiring attendance at one location for lectures. Another example would be a mentoring scheme whereby Optometrists who are already qualified and experienced agree to supervise members of the profession who are newly qualifying in therapeutics.

Kind regards,
Ursula White