

**Subject:** Submission on the proposal for therapeutic qualification to be included as a requirement for general registration.  
**Date:** Friday, 4 March 2011 11:51:32 AM

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**RE: Consultation document on proposal for therapeutic qualification to be included as a requirement for general registration**

I would like to make a submission on this proposal as follows.

I think it is great that Optometry is moving forward into a therapeutic area of practice and I see it as the way forward. However, it is the process of including therapeutic qualifications as a requirement of registration that I would like to address.

Older, non-therapeutically qualified Optometrists trained and entered into their chosen lifetime career path, in good faith and with good intent to comply with the registration requirements as they existed at that time, to do the best for their patients for their working life. I think that by and large they have successfully followed their career path all their working lives with a satisfactory outcome for their patients. The lack of therapeutic qualifications has meant that they have been required to refer their patients with ocular pathology to the appropriately trained professional, and the absence (as far as I am aware) of any scandalous headlines to the contrary suggests to me that this process has worked very well and with no adverse consequences.

Therapeutically qualified Optometrists are now able to treat a proportion of the conditions that the non-therapeutically qualified Optometrists would have to refer elsewhere. As time goes on, and as Optometry Schools around the world are now including therapeutics in their curricula, natural attrition will mean that all registered Optometrists will eventually be therapeutically qualified. Therefore I see it as entirely appropriate that all NEW Optometry registrations should be required to be therapeutically qualified.

However, I consider it entirely inappropriate that non-therapeutically qualified Optometrists should be denied the opportunity to work out the rest of their working lives as they have done for years without any adverse consequences, because of a stroke of a pen.

Human beings are all different with regard to different personality types and I think it would be fair to say that some Optometrists possibly entered into the profession BECAUSE they did not treat medical conditions. There are some who don't want to be the last link in the chain and want to be able to refer cases on which are beyond their level of comfort (they want to be able to pass the buck so to speak). Should they now be penalised for their individual personality types, which were totally appropriate for the profession of Optometry when they made their career choice, and to the best of my knowledge have had no adverse consequence for the people they have been helping up to this point in time? I personally don't think so.

Now that therapeutics is part of the profession, the personality types that enter into the profession will self select (or self eliminate) as appropriate, as those entering the profession will know what Optometry in the 21st century entails. I also think this evolutionary type of process applies to our patients or clients. The vast majority of my patients do not come to me for therapeutic treatment, but as that option becomes increasingly more available, then patient thinking will evolve to reflect that. Surely we should let that process happen again by natural attrition?

Those Optometrists who are in the twilight of their working life may for a variety of reasons be unable or unwilling to put in the time, energy and financial resources to gain therapeutic qualifications. Those nearer the end of their working life may realistically never be able to gain any return on their investment of their time, energy and financial resources should they decide to gain therapeutic qualifications. Should the profession of Optometry throw these very experienced practitioners on the scrapheap before they are ready to make their own way there? Even without therapeutic qualifications those practitioners still have a lot to offer their patients and also their younger colleagues with regard to experience and problem solving. Is our profession so rich in that experience it can afford to throw some away? I saw this happen to a number of good practitioners

when diagnostic pharmacology became a requirement for registration in New Zealand.

I also think there is a more human aspect to this - it is well known that retirement can be quite stressful for some individuals. Is the governing body of the profession comfortable with the concept of adding to those stresses by creating an environment where the plans older practitioners may have made for their exit from the profession are rendered not viable by the stroke of a pen? I see the potential for financial, emotional and health issues to be aggravated by such a course of action.

I am all for the ongoing development and broadening of the skills base of the profession but I truly believe the profession owes practitioners the opportunity to work out their days as they envisaged, and as were entirely appropriate, when they embarked on their careers.

Thank you for considering my submission and I hope the best interests of all entities involved, including individual practitioners, the general public and the profession at large are served by the process of considering this proposal to include therapeutic qualifications as a requirement for general registration.

Regards

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