Subject: Proposal for therapeutic qualification as part of registration

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1. There is benefit in requiring optometrists to be therapeutically endorsed especially in areas where medical/ophthalmological care is unavailable. However, in areas where medical care is available there is no benefit as the patient will have immediate access to that care.

- 2. It is NOT a reasonable expectation for all optometrists to have therapeutic qualification in order to practise. You will lose those who have a practice to run and a family to care for who are extremely limited in time. I work in a semi-rural area and finding an optometrist to even work for me is difficult. I am now expected to put in time and effort to gaining this qualification which takes me away from my business which won't run without an optometrist which I won't have when I'm away doing study.
- 3. Therapeutic qualification should NOT be a requirement for practice as an optometrist in Australia. Given that only 20% of optometrist in Australia have gained such qualifications since Victoria first introduced therapeutics some time ago is evidence that this is not on the minds of many optometrists. Therapeutics was not part of the course I did to gain qualification as an optometrist. If I wanted to prescribe drugs I would have gone and done medicine. There should be a grandfather clause for graduates of the original optometry to not be required to do therapeutics in order to continue practising.
- 4. Should therapeutics be a requirement, there should be a grace period of 10 years. It give females optometrists time to balance work, family and study.
- 5. Overseas trained optometrists who did not have therapeutics as part of their optometry degree should not be expected to complete competency assessments for therapeutic practice. If therapeutics was part of their degree, then yes.
- 6. Optometrists practising non-clinical roles should NOT be required to hold therapeutic qualifications.
- 7. The proposal forces existing optometrists to do a course which was not part of the original degree they applied for. There is nothing wrong with having two tiers of optometrists. It works well now, so why change it.

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