Subject: consultation document on proposal for therapeutic qualification to be included as a requirement for general

registration

Date: Wednesday, 9 March 2011 11:38:45 AM

To the OBA,

I do not support the proposal for therapeutic qualification to be included as a requirement for general registration as there is no justification or evidence suggesting that there is a need within the community. For the past 50 or so years optometrists have practiced without harm to the public without therapeutic qualifications. The majority of patients that seek optometric care have healthy eyes and do not require therapeutic drugs prescribed.

According to figures supplied by the board there are currently 20% of optometrists who are therapeutically qualified despite courses being made available for the past 15 years. Of the 20% a good percentage would have obtained their qualifications through the undergraduate course since 2007, leaving only a small percentage of optometrists who have retrained. The figures alone say much for the need to practice optometry with therapeutic qualifications. Optometrists are highly competent in their management without therapeutic qualifications and when it is required the system of referrals to ophthalmologists or G.Ps can be utilised to support the care of patients when deemed necessary. Optometrists who have felt it essential to their mode of practice e.g. country practitioners or those with special interest in therapeutics, would have had a strong impetus to qualify in therapeutics and would have already done so or have plans to do the course. However, in the past few years there have been a great decline in enrollments for the therapeutics course, adding to the suggestion that realistically practising optometrists do not feel the need to obtain therapeutic qualifications in their day to day practice and there are also many other valid reasons also for not being able to, such as costs, inconvenience of their businesses, family commitments etc.

The board appears to be trying to justify the need to have optometrists therapeutically qualified all but for the an administrative anomaly regarding overseas qualified optometrists rather than a public necessity. I see no reason why the current system of reqistration needs to change. We have registered optometrists and where applicable therapeutically registered optometrists. Therapeutics is not essential within the scope of optometry and therefore requiring all optometrists to qualify is unreasonable. The board must be realistic in it's understanding of the role of optometrists in the community. The majority of people who seek optometric care have healthy eyes therefore the need to prescribe drugs is not a primary role of the optometrist. Just as not all ophthalmologist perform cataract surgery, not all optometrists want to be involved in drug prescribing. This decision should not be mandated but left to the individuals to decide.

Yours sincerely, J H Optometrist