

OCCUPATIONAL THERAPY BOARD OF SOUTH AUSTRALIA

ABN 79 664 434 632

OTBSA: 4/2011

7 October 2011

The Chair
Occupational Therapy Board of Australia
AHPRA
GPO Box 9958
MELBOURNE VIC 3001

Dear Chair

MANDATORY REGISTRATION STANDARDS

The Occupational Therapy Board of South Australia would like to make the following comments on the Registration Standards:

<u>Criminal History</u>	Support
<u>English Language Skills</u>	Support
<u>Professional Indemnity Insurance</u>	Support
<u>Recency of Practice</u>	Support
<u>Grandparenting</u>	

The Board is concerned that a person not holding an approved qualification should not be registered without demonstrating all contemporary competencies for entry level occupational therapists.

Continuing Professional Development

In South Australia, the Registration Board has been requiring CPD from registrants for 2 years. There are many learnings from that 2 years, including some which are outlined below. The project officer appointed to establish CPD has been asked to contribute to this feedback from the OTBSA in regard to CPD.

Particularly, the OTBSA would like to highlight to the OTBA the amount of training and development that was available to South Australian registrants in transitioning to a requirement for CPD. There were processes for discussion, questions and concern raised as well as having much written and electronic information available to practitioners. There was a high uptake on these processes by practitioners and feedback indicates this was highly regarded. It is anticipated and recommended that the OTBA might consider processes of support for OT's in this new national requirement.

Other comments:

1. The minimum number of hours of CPD specified annually

30 hours is seen to be reasonable given the flexibility of the categories and maximum number of hours that can be claimed within each category.

There is some concern that there is no requirement for non-practising practitioners until they reapply.

2. The mix of CPD activities proposed

The categories and hour limitations are very reasonable and do-able for practitioners. Many of the queries in the SA program were about interpreting the 11 different categories and in which category should practitioners claim PD activities. Only having 3 categories will significantly minimise this potential confusion.

There are many ways of claiming for providing supervision or mentoring but in which category would a practitioner claim for receiving supervision or mentoring?

3. Training Requirements

The portfolio requires certificates from "approved training or education provider" – Currently there is no way of knowing which courses are 'approved'.

4. The level of flexibility in how the CPD activities can be met

In the OTBSA model there is a policy for practitioners who, due to exceptional circumstances cannot meet the requirements in the guidelines. The experience in SA is that it has not been inappropriately used by practitioners to evade their PD responsibilities and some have had very genuine cases. In the SA model, the onus is on the practitioner to identify how they can still participate in PD activities within their exceptional circumstances such as by undertaking greater than the maximum normally allowed for informal learning activities, or if necessary, deferring a portion of their hours to the next PD period. This has worked well over the two years in operation in SA.

5. Whether first-time registrants will be able to meet these requirements

Clear rules will need to be established for those who register only part way through a registration year as this has caused some confusion in the SA system.

6. Whether transitioning registrants will be able to meet these requirements

Those practising in states without registration have 15 months in the first year which is a very reasonable way of moving such practitioners into the flow of annual CPD recording.

The Board wishes to thank the Occupational Therapy Board of Australia for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Peter Martin', with a stylized flourish at the end.

Peter Martin
REGISTRAR/CEO