

Comments on the Proposed Registration Standards for Occupational Therapists

Background information on the person providing the comments:

My name is Justin Scanlan, I hold a BOccThy from the University of Queensland (1998) and a PhD from the University of Sydney (2010).

I am currently professional senior for occupational therapy in a large mental health service in New South Wales. In my current role, I provide professional leadership and representation for approximately 50-60 occupational therapists working in the mental health service.

I have previously worked in a University as a fieldwork coordinator and lecturer for occupational therapy students and have been involved in curriculum design and review.

These comments are based on my personal reading of the proposed registration standards and are my opinions alone. The opinions, however, are informed by discussions held with occupational therapists under my leadership within the mental health service.

1. Draft registration standard: Continuing professional development (CPD)

1.1 The minimum number of hours of CPD specified annually

30 hours seems appropriate. Will there be a requirement for occupational therapists on practice breaks (e.g., maternity leave for periods of 1-2 years) to demonstrate 30 hours of CPD in the last 12 *calendar* months, or will it be in the last 12 months of their practice? I would suggest that it be the last 12 months of their practice, rather than 12 calendar months. This ties in with the recency of practice proposed standard where it generally suggests that only people with periods of greater than 5 years would need to demonstrate 30 hours of CPD in the preceding 12 calendar months.

1.2 The mix of CPD activities proposed

Seems appropriate

1.3 The proposed format of CPD record-keeping

Recording of activities seems appropriate, although will be a substantial change in practice for many therapists.

The requirement for establishment of CPD "Goals" may not be very useful. I think this requirement may end up become a "paper" exercise for many therapists, rather than a true prospective goal setting exercise. Whilst most therapists will have a general plan for development, I think that much CPD (especially formal learning opportunities such as conferences and workshops) that is undertaken is probably fairly unplanned. For example, some practitioners in mental health might see a course advertised on solution focussed therapy and may select to attend, even if this was not part of their CPD development plan. I would argue that this is still valuable CPD. I wonder whether the requirements for goals would mean that therapists wait until the end of the year and then design "goals" that match whatever CPD they have undertaken.

I do, however, acknowledge that it is important to encourage all practitioners to have a forward-looking approach to professional development.

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

Appropriate.

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

I would strongly oppose these requirements applying for new registrants from current non-registered states (e.g., current practicing occupational therapists in NSW) at the point of commencement of National Registration, as this may place undue burden upon them in terms of gathering suitable documentation (ie 30 hours of CPD in the period July 2011-June 2012) as they have been, up to this point, unaware of these requirements.

See response to point 1.6 below for further comments on this question.

As most “new new” registrants (i.e., people who have never practiced previously) will be recent graduates, then I think most should be able to claim their university studies in the preceding 12 months as sufficient to meet the requirements. Indeed for newly graduating therapists, I believe that there should be an “automatic” achievement of this requirement by having completed university studies in occupational therapy in the preceding period (under the proposed standards, new graduates would only be able to claim a maximum of 20 points for undertaking university education, which seems a little odd).

1.6 Whether transitioning registrants will be able to meet these requirements

The following extract from the proposed standards:

The Board recognises that not all occupational therapists transitioning to the National Registration and Accreditation Scheme have been subject to CPD requirements.

Accordingly, the initial period to meet the requirements in the CPD Standard will be 17 months from 1 July 2012 to 30 November 2013. From 1 December 2013 all registered occupational therapists will need to comply with this standard each year.

suggests that evidence of compliance with 30 hours of CPD in the preceding 12 months will not be required for transitioning occupational therapists at point of initial National Registration. Is this the case?

If not, I would strongly oppose this criterion applying to transitioning registrants, as this may place undue burden upon them in terms of gathering suitable documentation as they have been, up to this point, unaware of these requirements.

1.7 The impact of these standards on professional associations that run CPD programs

No specific comments.

2. Draft registration standard: Criminal history

No specific comments

3. Draft registration standard: English language skills

3.1 The evidence which will be accepted

I would suggest that results from IELTS examination (General Module) should be accepted also in addition to the Academic Module. This is the examination that has been undertaken by many practitioners who have residency via the Skilled Immigrant program.

For current practitioners (especially those who have been practicing for many years), I would think that evidence of ability to practice should be accepted as evidence of English language proficiency.

For people transitioning into National Registration, (e.g., people currently working as occupational therapists), I think that for initial registration, this aspect should not apply, or that they should be able to provide references from employers / colleagues who can support their ability to practice in English and that this be deemed suitable evidence.

3.2 The minimum test result levels

7s in all 4 areas of the IELTS is a high standard, but I think is reasonable.

3.3 The timeframe for English language test results to have been completed

Where someone has been practicing in English in Australia for a number of years, I think that any examination results, regardless of age should be acceptable, especially for the first round of registration.

How will the transition from student to practitioner registration be affected by this requirement. At the completion of their course, many students who undertook their tertiary studies in Australia (but secondary studies in another country) will have IELTS results (for entry into the course) that are more than 2 years old. This would suggest that they would need to resit an IELTS examination and this seems unreasonable.

3.4 The effective communication requirements for all practitioners

3.5 The exemptions from the standard

Will there be a requirement for applicants who undertook secondary or tertiary education in Canada to prove that they were educated in English in both secondary and tertiary institutions?

General comments / questions on this requirement:

There is no clear statement about how much secondary schooling is required to be in one of the Exempt countries. Does it need to be all secondary schooling, or can it be any part of secondary schooling?

For occupational therapists who are currently practicing, will there be a requirement to demonstrate English language proficiency for "first round" registration? If there is, this will be a complex and potentially very burdensome (and costly) process. As stated above, I think that references from employers should be sufficient evidence for these practitioners to demonstrate English language proficiency for first round registration.

A couple of case studies which may be useful for you to consider:

- (1) Practitioner has been working for 20 months. Secondary education in China (in Mandarin). Completed IELTS (Academic) prior to University entrance (one 6.5, some 7s and an 8). Completed IELTS (General) for skilled immigration visa (four 7s).
- (2) Practitioner has been working for 12 months. Secondary education in India (in a British School, taught in English). University in Australia. Is secondary education in English in a non-english speaking country sufficient evidence of English Language proficiency or is an IELTS / OET test required.
- (3) An occupational therapist who has been practicing in English in Australia for 20 years and who has never completed an IELTS examination.

How would these people go about proving English language proficiency and how will these requirements be advertised to current practitioners.

4. Draft registration standard: Professional indemnity insurance

No specific comments

5. Draft registration standard: Recency of practice

This section seems reasonable.