

A few comments:

1. The thirty hours of PD seems quite high compared to physiotherapy for example, and could impose quite a time commitment on part-time and casual workers in the OT profession. For academic staff PD occurs all the time within the teaching eg reading journals, going to research seminars, so it needs to be quite explicit as to what constitutes what is related to the "practice area" .
2. Will the registration board have a website into which members can upload the evidence as the year progresses to make auditing a simple process?
3. The language levels are critical for international students wishing to become OT students and to progress through the course. The IELTS requirement is 7.0 in each stream, which over a number of years has proven to be appropriate due to the content and complexity of the OT course. Students are learning not only to learn in English, but are learning a discipline specific language, and consequently, units such as neuroanatomy (Neuroscience Neurodevelopment) and pathophysiology prove very difficult for them if they do not have a 7 in all streams of IELTS. Students who do not meet this requirement struggle, and a number have failed due to this aspect. It is also very difficult for these students when in the fieldwork aspect of the course. We do not accept students into the course who do not meet the IELTS requirement, or the equivalent English language test requirements. Fieldwork requires students to be able to communicate with clients, staff, family, administrators on various levels, and to be able to communicate effectively in writing also as these are legal documents. All OTs would agree that our communication skills are as important as any other skill that we possess as therapists.

Regards,
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