

Dear Occupational Therapy Board Members,

Re: Mandatory registration standards

Thank you for the opportunity for occupational therapists to comment on the draft registration standards in line with s40(1) of the Health Practitioner Regulation National Law (NSW).

I am supportive of the proposed mandatory registration standards excepting in relation to aspects of the Continuing Professional Development (CPD) Guidelines -

- 30 hours CPD per year seems to be an excessive requirement for the aims of registration to be met, particularly when compared to the 20 hours required by physiotherapists who could be considered a similar professional grouping;
- if arguably work role informal learning activities such as listed examples - "Practiced (sic) measuring for ramps and preparing drawings" and "How to search Pubmed and the Cochrane database for free access articles and reviews" can be counted as CPD, it would seem reasonable that a therapist developing a range of skills, for example through documented supervision of other therapists, could consider this to be CPD, even though such supervision is within the therapist's work role responsibilities;
- the reflection component of CPD may be better characterised as learning goals being met rather than student level observations as exemplified in the document, which seemed to reflect an immaturity of occupational therapists as a professional group;
- I would like to comment that aspects of the draft document seem to reflect the documentation of the body that represents occupational therapists, although with a level of membership I believe to be unrepresentative of a large number of practising occupational therapists.

Regards,

M. Hunt