

To whom it may concern,

I would like to comment on the Consultation Paper issued by the board dated August 2011.

1.1 Minimum number of hours of CPD specified annually

I believe that 30 hours of required CPD activities are excessive given that other allied health (physiotherapists) and even nurses, who arguably are involved in more critical care, are only required to perform 20 hours of CPD. What is gained by over-exceeding similar professional registration standards other than risking therapists "falsifying" their records to obtain the required hours?

1.2 Mix of CPD activities proposed

I believe it excellent to have the opportunity to chose between activities in the proposed 3 categories, however would like clarification on the difference between following activities: journal club, reflective journaling and reviews with colleagues+ case presentation.

1.3 Proposed format of record-keeping

I understand that the record keeping is directed towards demonstrating how CPD activities undertaken improved a practitioners competence and helped him achieve his/her development goals. In that context I find your suggestion of a "reflection" and your examples provided highly offensive. This record is meant to show how CPD activity leads to improved professional competence and you ask therapists to document at a 1st year OT student level such as "take calculator on visits" (page 17).

A statement on how the particular activity relates to a certain CPD goal would show the activity is "directed towards maintaining and improving the practitioner's competence" (page 6). e.g Activity measuring ramps - related goal: improve skills for complex home mods.

A reflection such as "Good to complete online quiz successfully" (page 16) does not show professional improvement.

I do not believe that the public would put their trust in OT's who gain their registration by spending time on writing reflections like that. Let the CPD record show a level of professionalism not childishness!

1.4 Level of flexibility in how the CPD activities can be met

Conflicting information provided on page 10 in relation to mix of CPD activities You wrote: " a mixture of activities from three categories is to be undertaken..." followed by : "...is not required to undertake CPD from all categories." These two statements contradict each other.

1.7 Impact of these standards on professional associations that run CPD programs

I would appreciate clarification on what you define as an "accredited course"

I believe there will need to be provisions made to ensure a variety of new/extra accredited course are available for practitioners - both in city and rural NSW.

Providing accredited courses in new formats such as on-line versions, that are available out of work hours and regardless of location, may be beneficial.

Kind regards,

A. Butcher