

I would like to provide feedback on the Draft Mandatory Standards for Professional registration.

1) English language requirements.

The requirement to provide IELTS test scores (and only the academic version, not the general version) is too harsh on existing practitioners, many of whom migrated to Australia under the general skills category where they undertook IELTS testing in the "general" category. Having to re-sit the examination (no matter how high your score was in the "IELTS general" version) is too much of a burden on existing practitioners. What about candidates who have scored 8 out of 9 in the IELTS category- how unfair is that they are required to re-sit the exam just because it was not the required version.

This proposed policy particularly discriminates against rural practitioners, as IELTS exams are generally conducted in capital cities only. Ideally, all practitioners currently practicing in Australia within the last 2-3 years should be 'grandfathered' into the new system. But if the board insists on testing, then all version of IELTS should be accepted. This will remove the much complained about processes where overseas graduates are made to run from pillar to post AFTER their arrival in Australia (The issue arising from the Australian Govt accepting one version of IELTS prior to issuing visas only to have the registration boards insisting on a different version of IELTS after they arrive in Australia)

2) The requirement to have practiced 5 years is too discriminatory against new graduates. Consider that many of the new graduates are eligible for "senior clinician" role with 3 years of experience- to now have to start from scratch to re-accredit with the OT board is too high a burden- 2 or 3 years is more appropriate.

Kind regards,

S. Padinjath