



Feedback from the Occupational Therapists Board of Western Australia (OTBWA) re Proposed Mandatory Criteria

Criminal History: The OTBWA has no feedback re the proposed standard and supports the standard as drafted.

English Language: The OTBWA has no feedback re the proposed standard and supports the standard as drafted.

Professional Indemnity Insurance: The OTBWA has no feedback re the proposed standard and supports the standard as drafted.

Continuing Professional Development: The OTBWA offers the following comments re the draft of this mandatory criteria;

- Minimum hours of CPD specified annually – the OTBWA supports the minimum requirement of 30 hours / annum. However the OTBWA suggests that consideration be given to recognising that in some circumstances there may be valid reasons why an occupational therapist is unable to comply with the requirement to undertake CPD at the prescribed level, for example due to long term illness of the practitioner or dependent family member, extended periods of travel, family leave etc. Although some of these circumstances may raise other questions eg fitness to practice / impairment it is recommended the OTBA consider offering exemptions in some circumstances for limited periods on a case by case basis.
- Mix of CPD activities proposed – the OTBWA supports the mix and maximum number of hours per activity as drafted.
- Proposed format of record keeping – the OTBWA supports the requirement for a standardised record keeping template to ensure the Board receives the required information in a format acceptable to the Board.
- Level of flexibility in how CPD activities can be met – see comments under Minimum hours of CPD specified annually above.
- Whether first time registrants will be able to meet these requirements –
 - It appears that the Board requires occupational therapists intending to return to practice after an absence of five or more years to have made this decision up to twelve months prior to returning to work in order to have completed the required minimum continuing professional development. This may not be possible in all circumstances.
 - There is a requirement for practitioners to undertake CPD in the practitioners chosen area of practice however if they are required to do the CPD prior to seeking employment what mechanism is in place to ensure this is achieved.

- Clarity is required to demonstrate that the Board has in place a means of remedying the situation should a therapist wish / be required to return to practice without having completed the mandatory CPD requirements.
- The OTBWA suggests that a condition be placed on the registrant that they need to complete a formal period of six months full time equivalent supervised practice eg a return to practice audit that is in line with the requirements for overseas practitioners wishing to practice in Australia. This could be administered by OTC on a cost recovery basis.
- It is further suggested that new graduates be exempt from the requirement to have completed 30 hours of CPD activities simply because they will have provided the Board with evidence of being competent having passed their course requirements.
- Whether transitioning registrants will be able to meet these requirements –
 - As above
 - Under the transitioning arrangements it is understood that registrants in states and territories with registration will register with their current Board in 2012 and then transition therefore will be required to meet that states / territories current requirements rather than the OTBA mandatory criteria. This will therefore provide these practitioners with some additional time to learn of and comply with this and other mandatory criteria. The OTBWA believes it will be necessary to ensure all practitioners are given 12 months notice re the requirement for mandatory CPD. Certainly in WA the requirement for CPD currently only applies to practitioners who registered or re-register following voluntary removal of their name from the register after 1st April 2008. It will be important to ensure that all registrants are made aware of this requirement early enough to enable compliance.
 - It is further suggested that the OTBA request that OTC require copies of CPD activities utilising the same format as the OTBA requirements as part of its assessment of competence to practice in Australia either at Stage 1 or Stage 2 (or both if there is a delay following the Stage 1 assessment process before the practitioner arrives in Australia).
 - Impact of these standards on professional associations that run CPD programmes – the OTBWA supports the position of the OTBA re the participation in a CPD programme offered by the professional association. Additionally it should be noted that the Occupational Therapy Australia (WA) also offers a CPD programme that may be used by WA practitioners as evidence of continuing CPD.
- Other Feedback - It is suggested that the OTBA link the requirement for Continuing Professional Development to the Australian Minimum Competency Standards. This document supports performance management and recognises the development of advanced level / specific levels of competency with the overall aim of ensuring occupational therapists provide competent care. It is suggested that the OTBA require each occupational therapist to identify and document specific learning goals and a CPD plan and documents these for audit purposes.
- Under the section 'What counts as CPD?' the Guidelines state that undertaking your day to day work duties cannot be counted as CPD –
 - it is suggested that examples be included related to CPD activities that are not considered relevant to maintenance of professional competence eg attendance at

employer required training such as fire evacuation, occupational health & safety, computer skills training. The experience of the OTBWA provides evidence that occupational therapists frequently submit these types of activities as evidence of CPD. We believe it will save the OTBA time and work if it is made clear in the policy that these activities are not considered appropriate.

- In Appendix 2 some examples given seem to contradict this aspect of the guidelines eg practicing measuring for ramps and preparing drawings seems to be an example of day to day activities although perhaps attending in-service training to develop competencies in this area would be acceptable.
- Under the Requirements
 - Point 3 & 4 – suggest these be amalgamated to read ‘A CPD Record must be kept to document details of activities completed. Practitioners must keep evidence of CPD activities in a Portfolio. This evidence must be retained for five years and be made available for audit if required by the Board.’
 - Point 5 it is suggested this be moved to point 3 to make it more sequential.
 - Point 6 be deleted as this point is made in Points 3 & 4 above

Recency of Practice: The OTBWA offers the following comments re this standard;

- Timeframe of five years to determine recency of practice – the OTBWA supports the five year time frame however in the existing draft standard there is no defined minimum period of practice within the past five years nominated as being required. It is suggested that a period of six months full time equivalent practice be required. This would ensure consistency with the requirements of the Occupational Therapy Council’s six month practice audit for overseas trained therapists.
- Scope of application – there seems to be some confusion / interchange of the terms recency of practice and competence to practice. It is suggested that the links be made in this standards summary tying in the requirement for services to be provided by practitioners in a safe, professional and competent manner with the Boards requirement for all occupational therapists to be able to demonstrate recent practice when seeking registration / re-registration.
- Methods proposed to demonstrate current competency - It must be recognised that recent practicing status does not determine competency. Likewise competence in one field of practice does not ensure competence in all fields of practice. It appears that the Board requires occupational therapists who are intending to return to practice after an absence of five or more years to have made this decision up to twelve months prior to returning to work in order to have completed the required minimum continuing professional development. This may not be possible in all circumstances.
- The ways that practitioners who have not met the recency requirements to re-enter the workforce – the OTBWA supports the Boards suggested methods of remedying non-compliance.

Grandparenting – the OTBWA supports the requirements published by the Board for applicants applying to registration under the grandparenting arrangements including the time limitations imposed.

Other feedback – The OTBWA strongly suggests that the National Occupational Therapy Board of Australia consider the requirement for practitioners on working visa's to undergo a PA / period of supervised practice before being granted unconditional registration. We understand that currently only the Western Australian Board requires practitioners to undertake a practice audit prior to being granted unconditional registration. There seems to be no logical rationale for Australia to require migrants to undertake six months of full time equivalent supervised practice in addition the those requirements included in the Stage 1 assessment process but not require those on short term working visas to undergo the same level of assessment. These practitioners are just as likely to have difficulty adjusting to the Australian conditions, requirements and context as those wishing to migrate.

On behalf of the Occupational Therapists Board of Western Australia

4th October 2011