



6 October 2011

Ms Jacqui Barry
Executive Officer
Occupational Therapy Board of Australia
AHPRA
GPO Box 9958
MELBOURNE VIC 3001

Dear Ms Barry

Occupational Therapists Board of Queensland submission on the proposed mandatory registration standards to be developed in accordance with the National Law and a draft grandparenting and general registration eligibility registration standard.

The Occupational Therapists Board of Queensland thanks the Occupational Therapy Board of Australia for the opportunity to comment on the consultation document on proposed registration standards for the profession.

After consideration of the consultation paper, it is advised the Board generally supports the proposed standards. The Board is satisfied with the arrangements proposed with respect to the following and does not wish to provide any comments:

- Criminal History
- English language skills
- Professional indemnity insurance
- Recency of practice
- Grand parenting and general registration eligibility

With regard to the proposed mandatory registration standards for **Continued Professional Development**, the Board would comment as follows:

Clause 2 of "Requirements" [page 6 of 43]

Requirement 2 is not flexible enough to allow for practitioners who have been and still are practicing in one area of practice, but wish to transition, or currently are transitioning into another area of practice. More flexibility is achieved if the words "**must be**" are changed to "**should be**".

By example: -

2. *"The CPD activity claimed **must be** directed towards maintaining and improving the practitioner's competence in their chosen area of practice. Continuing professional development activities should have clear goals and outcomes."*

Change to....

*"The CPD activity claimed **should be** directed towards maintaining and improving the practitioner's competence in their chosen area of practice. Continuing professional development activities should have clear goals and outcomes."*

Clause 2 of Requirements [page 6 of 43 – point 2]

The phrase "chosen area on practice" is a little confusing. One would assume that the intent is not to restrict CPD to existing workload but rather to relevant areas of OT practice.

Clause 6 of "Requirements" [page 9 of 43]

Requirement 6 is not precise enough to be clear.

The national law requires CPD to be performed, and auditing of the CPD legislative requirement is a given. For administrative and cost reasons, not all practitioners will be the subject of CPD audits; however **periodic audits will be conducted** every year. In its current form, Clause 6 could be interpreted to read, that in some years, CPD audits may not be conducted.

*6. "**Periodic audits may be conducted** to ensure that practitioners are compliant with this standard. If audited, a practitioner must produce their CPD Record and CPD Portfolio of evidence"*

Change to :

***Periodic audits will be conducted** to ensure that practitioners are compliant with this standard. If audited, a practitioner must produce their CPD Record and CPD Portfolio of evidence".*

Should you require clarification of any of the above comments, please do not hesitate to contact myself or Mrs Helen Davey on (07) 3225 2505.

Yours sincerely



Michael Demy-Geroe
Executive Officer