

Thank you for the opportunity to comment on the consultation paper on proposed registration standards for:

- Continuing professional development (CPD) and CPD Guideline

Firstly, I endorse the concept of professional development – ideas, theories and practises change over time and these require consideration and implementation (if appropriate) by practitioners.

My immediate concern with this proposal is that it is tailored to suit the full time or part-time (3-4 days weekly) occupational therapist who also has the work-place support; i.e. supervisors, colleagues, library resources, a selection of various departmental specialties, time and facilities to aid in implementing these requirements, particularly in category one. There is no problem with this for clinicians employed in this environment, but it is more difficult for sole practitioners working, for example, one day weekly, to meet these requirements. There are many part time occupational therapists working in this situation – I will use my own circumstances as an example.

I retired from fulltime work three years ago (managing an OT department in a suburban hospital) and was approached by an Aged Care residential facility to work one day weekly – the main duties to include-

- ACFI assessments (Commonwealth Government requirement)
- monitor/implement appropriate activities and events for the residents (varying degrees of dementia)
- ensure activities staff are performing their duties to a satisfactory standard

This facility had not been able to recruit an OT for over a year when I commenced. They had employed (prior to that) for short periods, younger OTs who left immediately they obtained full time employment or for positions that they perceived as more interesting work.

My concern is that whilst I have developed a keen interest in dementia – types, possible causes, progression, treatment, management, outcomes, carers needs – and have made significant progress in achieving better services for this facility's residents, it is difficult to foresee translating this into a continuing annual assessment of performance development at the level required, especially when the employment time is limited. This is likely to also apply to other small part time situations, e.g. paediatrics. Aged care is one of the fastest growing areas of "health" and it is important that occupational therapists – whose skills are unique in this area - are encouraged to participate in all areas of this growth, including residential facilities where standards of care and provision of activities are not always at an optimal level. Frequently these positions are limited in their hours due to the cost restraints, but are appropriate for OTs who are interested in this area and who have a useful contribution to make.

Thank you for considering my submission

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