

Ms Julie-Anne Anderson
Secretariat
Heath Workforce Principal Committee
c/-JA Projects Pty Ltd
4 Crescent Street
HUNTERS HILL NSW 2110

Dear Ms Anderson

Re: Occupational Therapy Board of Australia - proposed registration standards

NSW provides the following comments on the Occupational Therapy Board of Australia's proposed registration standards.

NSW has a number of comments with regard on the draft standards as presented by the Occupational Therapy Board. For the Continuing Professional Development (CPD) requirements on page 6 the Board should consider listing the formal learning activities required to be undertaken by applicants. The suggested transitional timeframe to meet the CPD requirements of 17 months is supported, however the transitional phase should contain an exception power for part time workers or practitioners who take maternity leave. Such an allowance will assist such practitioners' in meeting their CPD requirements.

The Public Indemnity Insurance (PII) standard on page 30 displays the current variation that exists in PII requirements for each National Board. AHPRA and National Boards should explore the adoption of consistent PII standards where possible.

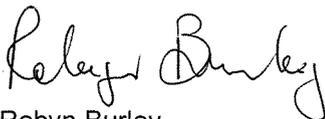
The Recency of Practice standard on page 34 should include a re-entry assessment for those practitioners who have been absent from practice for five years or more, this already occurs for other Boards. It is also unclear from the standard how 'practice competency' will be assessed for applicants who fall into this category of assessment.

The Grandparenting Registration Standard on page 39 does not list those approved qualifications for occupational therapy considered adequate. NSW understands that the Board has yet to approve this list, once finalised though it should be provided for jurisdictional comment.

With regard to Applications for Registration under grandparenting in accordance with 301 (1) (c) on page 40, NSW questions the request for a minimum of six references to attest to a practitioner's practice for those applicants to be assessed under clause (c). The impost of providing six references and six case studies for each applicant would be considerable if the numbers to be assessed in this category are high enough.

Should you require further information or advice please contact Anne Connolly on (02) 9391 9595 or via email at aconn@doh.health.nsw.gov.au.

Yours sincerely



Robyn Burley
Director
Workforce Development and Innovation

4.10.11