

To the Occupational Therapy Board of Australia:

In response to the proposed national mandatory registration standards dated August 2011, I have the following comments.

Firstly, the minimum number of hours of annual CPD should be kept in line with other similar professions. For example, The Physiotherapy Board of Australia requires 20 hours of CPD per year for registration. In the U.S.A, there is a 3 year registration renewal cycle requiring 36 CPD hours (which averages out to 12 hours per calendar year).

Considering the limited time and resources available to O.T's, the majority of which work in the public health sector, surely we should aim for a responsible yet achievable number of CPD hours? I would say that somewhere between 15-20 hours would be much more realistic.

The board should also consider reducing the CPD hours required due to the high number of part time workers in the profession. These O.T's have reduced opportunity to participate in professional development activities, both formal and informal. If the CPD hours were set as proposed, then it is conceivable that some workers would have to spend more time on completing CPD activities than actually working!! This is not only just ridiculous but it may force many O.T's to abandon the profession all together.

I would also like to suggest that excess CPD hours achieved during a registration year should be transferable to the following registration year.

Secondly, I believe that there should be wide spread consultation with practising clinicians from a variety of clinical areas in regards to what activities should be included in CPD. I am unclear as to whether the board is a complete representation of the Occupational Therapy profession.

Thirdly, in regards to keeping a CPD portfolio, I believe that documentation requirements should be kept to an absolute minimum. Details and evidence of the CPD activity with goals and outcomes is suffice. Reflection is something that we as professionals do automatically as part of our clinical reasoning process. This should not need to be documented. Let's leave that task to O.T students!! As we all know, time is precious. Let's spend it wisely!!

I look forward to reviewing new, more realistic proposed registration standards in the near future!

Regards,

A. Gotham