

I have just received a copy of the Proposed Registration Standards Consultation Paper from the Occupational Therapy Board of Australia from you saying it is open for comment, and after reviewing the document, I have a few questions and concerns about the CPD component in particular. I have tried to contact AHPRA but they are not answering their phones leaving you endlessly on hold, and their email portal online doesn't allow more than a very limited number of characters, which prevents me from communicating my concerns to them (convenient??). Before I write them a letter by snail mail, I wanted to see if you could help? My concerns relate to the situation under which I work as an OT, as outlined below:

- I work VERY part time, maximum 30 hours per MONTH (casual) in 2011, on average 20-25 hours/month to work around. I am not in a position to work more than this due to time spent caring for my two autistic children.
- I am self employed, meaning if I don't work, I don't get paid. To participate in CPD means I don't get paid for that time I participate, and I have to take this into consideration when planning my CPD activities.
- The 30 hours CPD/year does not include any time spent searching for appropriate CPD travel time, nor any actual costs associated with travel/flights/parking and care for my children (before/after school care) etc.
- CPD for Occupational Health, Injury Management or Coaching is often interstate/international, which is not justifiable on my income nor possible due to my career role for my children. This limits what I can do to meet the CPD requirements.
- Let's break this down – if next year I am working 25 hours/month (for arguments sake) for 11 months of the year (max), this means I have a potential income based on 275 hours/year. It is likely I could realistically be losing 30-50 hours or more per year of income to just attend/drive to/document/arrange/search for CPD, not including the cost of the actual CPD and associated costs as outlined above. $30/275 = 11\%$ of my available time and therefore is 11% in lost earnings from my gross income - PLUS any CPD costs and associated costs as described above!!!!
- For a full time OT employee working 37.5 hours/week, paid for 52 weeks per year, this percentage is $30/1950 = 1.5\%$ of their available time, which is also a minimal financial loss for their employer by comparison to my potential financial loss.
- At that same percentage of 1.5%, my CPD hours would be closer to $1.5\% \times 275 \text{ hrs/year} = 4$ hours/year. That is a significant difference from 30!

How is 30 hours/year CPD reasonable in my circumstances????

I do agree that a national registration body is a good idea, and that CPD is extremely important, including accountability to demonstrate participation in CPD.

However I wish to STRONGLY put forward that the required CPD hours be based on a PRO RATA system or a SCALED system, where your hours of CPD required a proportionate with how many hours you actually work in the industry, to make it affordable and realistic for part time or casual OT's.

I can demonstrate hours worked as part of my CPD portfolio if necessary, from my accounting program, and employee's could easily demonstrate hours worked through their employer.

The consequence of the CPD hours remaining at 30 hours/year for all registered OT's is that people in similar situations like myself will leave the profession, because it is not financially worth working if they are losing a significant proportion of their income purely to CPD activities.

Thank you.

Regards
J. Rolph