

I would like to submit feedback on behalf of OT AUSTRALIA WA which is the professional organisation representing most Occupational Therapists here in West Australia. We support the proposals for national registration and have the following comments to make on some of the points open for consultation -

- It's good to see a variety of activities and reflective practice being given recognised as examples of CPD. This allows rural OT's to also meet the requirements. We have found it necessary to stipulate that the same amount of activity is undertaken by part-time as well as full-time practitioners (as do not want a 0.5 competent therapist). It is correct that the board audit CPD portfolio's and would ask that the framework developed by OT AUSTRALIA WA for use by members, be accepted as suitable (we would change the hours from existing 25 to tie in with the proposed 30)

- Recency of practice - would recommend that after a break of 3 (rather than 5) years then 1 year of CPD is required as a minimum to regain registration

We have also been concerned about the following items which are not addressed in the consultation document but would hope are being considered -

- New grads setting up in solo private practice without supervision / mentoring from experienced OT poses potential harm to clients

- Overseas OT's and conditional registration - there has been a gap between COTRB accepting OT's practice audits and being able to gain temporary registration and unable to get HICAP provider number.

Thanks,

G. Smith