

To Whom It May Concern,

I wish to make the following comments on the Consultation Paper for Mandatory registration standards for Occupational Therapists (dated August 2011).

Generally I think it is a great thing for the OT profession to be registered and will provide more consistency of quality across the profession. However I think there are many aspects of the proposed document that need to be addressed. It is not an adequate document to support the compulsory registration of the OT profession and does not give realistic and attainable objectives for the majority of the OT population.

Perhaps a review of other countries where OT registration is compulsory would be helpful for the board to consider (Health Professionals Council and British OT Association in the United Kingdom, or the Canadian or American OT Associations) when deciding on their next course of action.

### **1.1 The minimum number of hours of CPD specified annually**

The expectation of 30 hours of CPD within a 1 year period is possibly too much, particularly when you take into consideration that other medical and allied health professions are only expected to undertake 20 hours. Is it also expected that a therapist that works part time undertake the same number of hours that a full time therapist is required to... That hardly seems fair.... What about therapists in remote areas who can not attend CPD events.

In some systems where CPD is required for professional registration the period is approximately 2-3 years of evidence rather than 1 year, which would be more realistic than every 1 year.

### **1.2 The mix of CPD activities proposed**

The categories are a little restricting. It is a big task for any therapist to undergo CPD that is outside the duties of their day to day activities. In essence this should include training such as manual handling, resuscitation training (I don't consider these within my day-to-day activities) that are associated with my CPD keeping up to date with my position as an OT.

In other countries where registration is compulsory there are OT competency standards for different levels of OT depending on years of experience and grading. This provides more of a guideline for CPD to be based and provides more structure to provide evidence. This should be considered.

I also feel that some 'day to day' activities such as supervision of junior staff should be included with CPD as long as reflections were kept and records of supervision was kept.

These would then be admissible as evidence.

### **1.3 The proposed format of CPD record-keeping**

#### **1.4 The level of flexibility in how the CPD activities can be met**

The proposed format and example for record keeping in the draft document is not very impressive and not useful as an example. I have heard comment from OT students that report that such a level of document would not be accepted at a University level.

The examples provided were not a true reflection on any activities that a qualified OT would do.

A better example with different levels of experience should be provided and reflecting different areas (ie. Clinical and non-clinical)

More flexibility should be used to allow for a greater variety of therapists to be registered.

The present document is a fine example of a system that is required for persons wanting to be OT Acc but not for compulsory registration, where the OT audience is including an extensive range of experiences and areas of practice (including isolated and remote sole therapist roles).

Example was given to write an article or write a book on OT – this is quite unrealistic for the average OT (although many of us would like to do this in our lifetime as an OT). Especially if the article/book can only count for 1 year of registration.

More flexibility for the acceptance of un-official CPD courses and programs that could count towards CPD would be more appropriate for a wider OT audience. It is unrealistic that every OT can attend/ afford / access an authorised CPD course/event.

#### **1.5 Whether first-time registrants will be able to meet these requirements**

#### **1.6 Whether transitioning registrants will be able to meet these requirements**

In other countries where registration is compulsory new graduates are expected to reach the standards within 1 year. However some of their specialist training from their final year at University could be counted in CPD.

Again OT competency standards would help in this situation – a basic entry level and further levels that can be used in conjunction with CPD evidence to remain registered.

#### **1.7 The impact of these standards on professional associations that run CPD programs**

In the past if I have attended events such as a conference or course that was aimed at more professions than just OT the certificates usually state the amount of credits or hours that can be counted for the course towards registration (eg. APA courses). Associations running events would have to be given guidelines as to how much could be counted.

I also feel that the emphasis is on external courses or conferences which can be expensive and not easily attended by remote and/or part time OT's.

If a CPD event is properly documented and reflected upon it should include internal courses that a department gives in internal training.

Thank you for allowing feedback to be received,  
I look forward to receiving a 2<sup>nd</sup> draft document.

Kind Regards,  
M. Sprangers