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Mr Glenn Ruscoe, Chair
Physiotherapy Board of Australia
PO Box 16085,
Collins Street West, Melbourne, Vic 8007

Dear Glenn,

I am writing on behalf of the Australian Physiotherapy Council in response to the Physiotherapy Board of Australia Consultation document: Registration standards and guidelines. It is noted that many of the Australian Physiotherapy Council recommendations in the June 2010 submission have been adopted – thank you for your positive consideration of that submission.

There are some minor aspects of the previous recommendations that were not adopted – the most significant is in the section entitled **Preparation for the APC clinical assessment**. The Australian Physiotherapy Council **recommends** that the document refers to the clinical part of the APC assessment process and not to the clinical component. The reason for this recommendation is that the APC uses the term “clinical part of the APC assessment process.” This wording was used in the recommendations in the June 2010 submission.

It is noted that the Board has responded to requests for practitioners registered under **Limited registration in the public interest** to move between practises without applying for a further assessment by the APC for the specific dates, scope and location of practice. The Australian Physiotherapy Council **recommends** that the Physiotherapy Board of Australia considers changing the paragraph under the four dot points in the Registration Standard and Guidelines to the following:

If the Board is not satisfied that, on the basis of the documents submitted with the application and the previous report from the APC, and any reports from the previous employer/supervisor, that it is in the public interest for the practitioner to practise physiotherapy for the specific dates, location and scope of practice of the new position, the practitioner will be required to submit a new application for limited registration to practise in the new position. The reason for this recommendation is to ensure that the Board can, and will, take into account the assessment undertaken by the APC. The current wording implies that the documents submitted by the new employer would form the sole basis for the Board's decision.

The Australian Physiotherapy Council **recommends** that the Board considers another heading under the Standard related to Limited Registration in the Public Interest that reproduces the information from the guidelines for a practitioner with limited registration in the public interest who wants to undertake the clinical part of the APC assessment process. The reason for this recommendation is to ensure the Standard and the Guidelines mention this requirement.

Please contact the Australian Physiotherapy Council Chief Executive Officer, Margaret Grant, [margaret.grant\[at\]physiocouncil.com.au](mailto:margaret.grant@physiocouncil.com.au), for further information or clarification of any aspect of this letter.

Yours sincerely

Margaret Grant
Chief Executive Officer, Australian Physiotherapy Council