



THE UNIVERSITY OF  
WESTERN AUSTRALIA  
*Achieve International Excellence*

**Centre for Musculoskeletal Studies**

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25 November 2010

Jill Humphreys  
Executive Officer  
Physiotherapy and Podiatry  
Australian Health Practitioner Regulation Agency (AHPRA)  
PO Box 16085  
Collins Street West VIC 8007

Dear Ms Humphreys

Thank you for the invitation to comment on the process of registration through the AHPRA which will affect international postgraduate students.

The Centre for Musculoskeletal Studies [CMS], at The University of Western Australia, has for over ten years provided postgraduate clinical and research training programs. Consequently there has been a close association with the Physiotherapists' Registration Board of Western Australia who have enabled registration of international and inter-state physiotherapists for the purposes of postgraduate studies. This association has meant a highly efficient documentation processing to enable the efficient placement of these physiotherapists in the tertiary hospital clinics used for supervised clinical training.

The Physiotherapy Board of Australia, through the AHPRA, has invited comment on the new process of application for limited registration. There are several categories of overseas trained physiotherapists who might apply for limited registration: [i] new applicants who are seeking to be registered for a defined time while they undertake postgraduate training or supervised practice (for instance those who are undergoing assessment by the APC) [ii] limited registration which is deemed to be in the public interest (eg. to fill a workforce shortage) and [iii] for teaching and research purposes. While there may be administrative economy by incorporating these three separate circumstances into one generic process, the result is unnecessary duplication of screening and checks of various criteria for eligibility.

**This submission is concerned only with the application for limited registration for a defined time period to undertake postgraduate training (form ALPS-08).**

Universities providing postgraduate training for overseas trained physiotherapists already assess applications for eligibility by undertaking due diligence through their respective International Centres, Faculties/Divisions and at the School/Unit level. This process verifies: academic qualifications, English language proficiency, relevance of clinical experience, professional registration and suitability for specific programs of postgraduate study. Consequently Universities have considerable experience in reviewing such applications.

It should be noted that the Department of Immigration administers VISA requirements to enter Australia for postgraduate study which involves criminal record screening and imposes strict time limits for the duration of student residency. The CMS provides letters confirming enrolment to all international students to expedite their VISA applications.

The new AHPRA process [ALPS-08] states an additional burden on academic program coordinators to perform essentially the same due diligence, in addition to verifying: criminal record history, impairment statements, records of suspension, conditions, disqualifications, health proceedings. Following their review the academic coordinator is expected to sign-off that they have authenticated all the information provided by the student and presumably will assume responsibility for the veracity of the application and attachments. After the final administrative review by AHPRA staff, this process

will amount to triple handling of each submission. A fee is then levied by AHPRA for final processing of the application and the limited registration.

It is claimed by AHPRA that the requirement for the educational institution to verify the documentation provided by the applicant is "to ensure that the institution understands and verifies their obligation on the supervision requirements and is intended as a measure to protect the public." However, academic institutions that have traditionally accessed State or Territory health services for supervised clinical practice would have already legislative and contractual arrangements in place governing obligations, expectations and responsibilities. Further, postgraduate students undertaking clinical training operate under close supervision by postgraduate qualified and AHPRA registered Physiotherapists which provides an additional assurance for protection of the public.

It is of concern that currently there is no commitment stated by AHPRA to perform timely document processing. Academic programs must place students under supervision in clinics with some efficiency to ensure appropriate opportunities for clinical training. Any delay in processing applications for limited registration by AHPRA could be problematic for such courses. Guarantees of reasonable timelines from submission to approval of limited registration need to be declared in the documentation. The benchmark in Western Australia has been less than 5 working days.

It is recommended that the ALPS-08 application form for overseas trained physiotherapists undertaking approved university-based postgraduate studies should only involve verification by the academic institution of the student's enrolment in an approved program. Substantiation of non-academic criteria should remain under the jurisdiction of the AHPRA in concert with the Department of Immigration [for VISA requirements]. This triage strategy will expedite processing and minimize unnecessary duplication.

It is acknowledged that the main role of the Physiotherapy Board of Australia is to ensure protection of the public. There needs to be a balance between this role, which requires the assessments that only PBA can provide, and that of Universities who are providing postgraduate programs for overseas trained physiotherapists and who undertake due diligence to ensure appropriate candidates are enrolled.

The AHPRA is the appropriate legislated body that should undertake assessment of applications from international students undertaking postgraduate study in Australia. This national office has the resources to investigate: impairment statements, records of suspension, conditions, disqualifications, health proceedings and such matters, just as it is the responsibility of the Department of Immigration to undertake thorough assessments of criminal record history etc.

Yours sincerely,



**KEVIN P. SINGER PT PhD**  
Winthrop Professor & Head

**C: Winthrop Professor Ian Puddey, Dean, Faculty Medicine, Dentistry & Health Sciences**