

Consultation on draft revised registration standards and guidelines

28 April 2014

Responses to consultation questions

Please provide your feedback as a Word document (not PDF) by email to physioconsultation@ahpra.gov.au by close of business on Monday, June 30 2014.

Stakeholder Details

If you wish to include background information about your organisation please provide this as a separate word document (not PDF).

Organisation name
Australian Physiotherapy Council
Contact information <i>(please include contact person's name and email address)</i>
Narelle Mills Chief Executive Officer

Your responses to consultation questions

<p>Registration standard: Professional indemnity insurance arrangements</p> <p><i>Please provide your responses to any or all questions in the blank boxes below</i></p>
<p>1. From your perspective how is the current Professional indemnity insurance (PII) arrangements registration standard working?</p>
<p>The Australian Physiotherapy Council (APC) believes that the current registration standard is working well. However we believe that the current Professional indemnity insurance (PII) arrangements registration standard would have benefited from clarification on the requirement for separate cover for practitioners with employment-specific cover purchased by their employer, who also engage in work outside their main employment.</p>
<p>2. Is the content of the draft revised Registration standard: PII arrangements helpful, clear, relevant and more workable than the current standard?</p>
<p>The Australian Physiotherapy Council (APC) believes that the draft revised Registration standard, PII arrangements are generally clearer and more helpful, and have addressed the issue identified in Question 1.</p>
<p>3. Is there any content that needs to be changed or deleted in the draft revised Registration standard: PII arrangements?</p>
<p>The Australian Physiotherapy Council (APC) has no specific comment on the content of the draft revised</p>

Registration standard: Professional indemnity insurance arrangements

Please provide your responses to any or all questions in the blank boxes below

Registration standard: PII arrangements.

4. Is there anything missing that needs to be added to the draft revised Registration standard: PII arrangements?

The Australian Physiotherapy Council (APC) has no specific comment on the content of the draft revised Registration standard: PII arrangements.

5. Do you have any other comments on the draft revised Registration standard: PII arrangements?

The Australian Physiotherapy Council (APC) has no specific comment on the content of the draft revised Registration standard: PII arrangements.

6. Do you think that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

The Australian Physiotherapy Council (APC) believes that the proposed review period of three years provides the appropriate level of flexibility to address any potential issue that may arise.

Registration standard: Continuing professional development (CPD)

Please provide your responses to any or all questions in the blank boxes below

7. From your perspective how is the current CPD registration standard working?

The Australian Physiotherapy Council (APC) is not aware of any issues with the current CPD registration standard.

8. Is the content of the draft revised Registration standard: CPD helpful, clear, relevant and more workable than the current standard?

The Australian Physiotherapy Council is not aware of any issues with the current CPD registration standard, but believes that the draft revised Registration standard: CPD is clearer and more helpful.

9. Is there any content that needs to be changed or deleted in the draft revised Registration standard: CPD?

The Australian Physiotherapy Council (APC) does not have any changes or deletions to the draft revised Registration standard: CPD.

10. Is there anything missing that needs to be added to the draft revised Registration standard: CPD?

A link to the portfolio template should be made more visible on the Physiotherapy Board of Australia website, on the registration standard document and on the guidelines document.

11. Do you have any other comments on the draft revised Registration standard: CPD?

There should be regular, evidence-based review of the requirement for 20 hours of CPD with the appropriate bodies such as the Australian Physiotherapy Association and the Australian Physiotherapy Council (APC).

A conference over the course of three full days, for example, would meet the CPD requirement.

Registration standard: Continuing professional development (CPD)

Please provide your responses to any or all questions in the blank boxes below

The APC also believes that it should be considered whether learning activities such as the attendance of a First Aid course or a Work Health Safety training program should be excluded from being considered as part of CPD activity, as these may provide no additional development to physiotherapy skills.

12. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

The Australian Physiotherapy Council (APC) believes that the proposed five years review period is appropriate.

Guidelines on continuing professional development (CPD)

Please provide your responses to any or all questions in the blank boxes below

13. From your perspective how is the current guidelines on CPD working?

- The Australian Physiotherapy Council (APC) believes that, while the current CPD registration standard acknowledges the importance of CPD and the “best ways to learn”, it does not provide enough guidance to practitioners on choosing the most effective forms of CPD.

There are studies available demonstrating the impact of different forms of CPD for health professions including physiotherapy and medicine. This information should be included in the registration standard.

The APC recommends that, in consultation with appropriate bodies within the profession, more specific guidance should be provided to practitioners on the most beneficial forms of CPD.
- As referred to in Question 12, the APC believes that the current guidelines do not provide enough guidance on whether learning activities such as the attendance of a First Aid course or a Work Health Safety training program should be excluded from being considered as part of CPD activity.

14. Is the content of the draft revised guidelines on CPD helpful, clear, relevant and more workable than the current guidelines?

While the draft revised Registration standard: CPD is clearer, it still does not address the points raised in question 13.

15. Is there any content that needs to be changed or deleted in the draft revised guidelines on CPD?

The Australian Physiotherapy Council (APC) does not have any further comment on changes or deletions that are required for the draft revised guidelines on CPD.

16. Is there anything missing that needs to be added to the draft revised guidelines on CPD?

As mentioned in Question 10, a link to the portfolio template should be made more visible on the Physiotherapy Board of Australia website, on the registration standard document and on the guidelines document.

17. Do you have any other comments on the draft revised guidelines on CPD?

Guidelines on continuing professional development (CPD)

Please provide your responses to any or all questions in the blank boxes below

The Australian Physiotherapy Council (APC) does not have any other comments on the draft revised guidelines on CPD.

18. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

The Australian Physiotherapy Council (APC) believes that the current review period of five years is appropriate.

Registration standard: Recency of practice (ROP)

Please provide your responses to any or all questions in the blank boxes below

19. From your perspective how is the current ROP registration standard working?

While the Australian Physiotherapy Council (APC) appreciates that the Physiotherapy Board of Australia determines each application on a case by case basis, we believe the current ROP registration standard does not provide enough information for physiotherapists who are returning to practice after five years.

20. Is the content of the draft revised Registration standard: ROP helpful, clear, relevant and more workable than the current standard?

While the Australian Physiotherapy Council (APC) believes that the content of the draft revised Registration standard: ROP is generally clearer, we have concerns over several sections within the standard.

21. Is there any content that needs to be changed or deleted in the draft revised Registration standard: ROP?

The wording in the section "What does this mean for me?" is confusing and unclear. The Australian Physiotherapy Council recommends that this is amended to:

When you apply for registration as a physiotherapist, including new or additional types of registration such as changing from non-practising to general registration or applying for an endorsement, you must meet this registration standard.

You do not need to meet this registration standard if you are a recent graduate applying for registration for the first time.

22. Is there anything missing that needs to be added to the draft revised Registration standard: ROP?

The Australian Physiotherapy Council (APC) has no specific comment on anything missing or that needs to be added to the draft revised Registration standard: ROP.

23. Do you have any other comments on the draft revised Registration standard: ROP?

The Australian Physiotherapy Council (APC) believes that the definition of "recency of practice" is problematic, as it is implicit that the definition refers "obtaining registration" to registration with the Physiotherapy Board of Australia.

The APC recommends that it is explicitly stated in the definition that for overseas qualified physiotherapists, recency of practice relates to recent practice in the profession since qualifying for, or

Registration standard: Recency of practice (ROP)

Please provide your responses to any or all questions in the blank boxes below

obtaining registration with any overseas registration body.

24. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

The proposed review period every five years is appropriate.

25. Do you think that 150 hours of practice per year or 450 hours of practice over three years is reasonable?

The requirements to meet the registration standard are unclear and can have adverse implications for overseas qualified physiotherapists undertaking the Australian Physiotherapy Council (APC) assessment process.

For an overseas qualified physiotherapist, it can be unclear that “registration year” refers to registration with the Physiotherapy Board of Australia

Requiring a minimum of 450 hours of physiotherapy practice during the three years before the start of the registration period may result in some APC candidates who undertake the APC assessment process after a brief break from practice will not meet the registration standard.

The APC considers 450 hours of physiotherapy practice during the three years before the start of the registration period or 150 hours of physiotherapy practice in the previous registration year will potentially disadvantage returning to work mothers or those with extended caring responsibilities. The hours (450 over 3 years or 150 in one year) stated are not referenced to a standard or evidence to understand that this is a suitable requirement for the currency of knowledge and professional competency. While the Council recognises the importance of ensuring competency to practise, the APC recommends that the timeframe of 5 years remain. It is also recommended that appropriate professional development activities be defined for clarity. Suggestions of how to continue practice whilst on leave, such as continuing association with workplaces, attending workplace PD or other things to build a portfolio of experiences and currency of practice are needed. The Council also recommends that examples of how application of physiotherapy knowledge may be demonstrated more broadly with an exemplar Appendix A and AHPRA CV, rather than a link to the general AHPRA website. In this manner the expectations of the Physiotherapy Board of Australia are better articulated.

The APC strongly recommends that the Physiotherapy Board of Australia revises these sections taking into consideration the comments above.

26. Is one year an appropriate period for the definition of recent graduate in the context of the physiotherapy profession?

The Australian Physiotherapy Council (APC) believes that it would be more appropriate for the definition of recent graduate in the context of the physiotherapy profession to be 24 months from graduation.

Recency of practice Guidelines (ROP)

Please provide your responses to any or all questions in the blank boxes below

27. From your perspective how are the current ROP guidelines working?

The Australian Physiotherapy Council (APC) is aware that the current ROP guidelines do not provide enough clarity for practitioners returning to practice after five years.

Recency of practice Guidelines (ROP)

Please provide your responses to any or all questions in the blank boxes below

28. Is the content of the draft revised ROP guidelines helpful, clear, relevant and more workable than the current standard?

The section "Plan for re-entry to practice" is extremely unclear to both overseas qualified physiotherapists and physiotherapists qualified in Australia, and should be clarified.

- The section can be interpreted to mean all physiotherapists applying for registration or re-registration has to submit a plan for re-entry to practice.
- For overseas qualified physiotherapists, the section can be interpreted to mean that all overseas qualified physiotherapists must submit a re-entry to practice plan regardless of whether or not they meet the ROP registration standard.

The first sentence in this section should be preceded by, "If you do not meet the Recency of Practice registration standard..." to clarify its intent.

29. Is there any content that needs to be changed or deleted in the draft revised ROP guidelines?

The Australian Physiotherapy Council (APC) believes that the phrase "after a break" in the Introduction should be deleted from "returning to practice *after a break*".

The APC is aware that some overseas qualified physiotherapists do not practice as physiotherapists while they are undertaking the APC assessment process, as there may be circumstances preventing them from finding employment under supervision to meet the requirements for Limited Registration. The APC does not believe that these physiotherapists are considered having taken a break from the profession.

Similarly, under "Plan for re-entry to practice" and "Supervision", the phrase "after a break of three years or more" should be amended to "after a period of non-practice of three years or more".

30. Is there anything missing that needs to be added to the draft revised ROP Guidelines?

The Australian Physiotherapy Council (APC) has no specific comment on anything missing or that needs to be added to the draft revised ROP guidelines.

31. Do you have any other comments on the draft revised ROP guidelines?

The Australian Physiotherapy Council (APC) has no other specific comment on draft revised ROP guidelines.

32. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

The proposed review period every five years is appropriate.

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