

## 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](mailto: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).*

<b>Organisation name</b>
Australian Physiotherapy Association
<b>Contact information</b> <i>(please include contact person's name and email address)</i>
Cris Massis CEO <a href="mailto:Cris.massis@physiotherapy.asn.au">Cris.massis@physiotherapy.asn.au</a>

#### Your responses to consultation questions

<b>Registration standard: Professional indemnity insurance arrangements</b> <i>Please provide your responses to any or all questions in the blank boxes below</i>
1. From your perspective how is the current Professional indemnity insurance (PII) arrangements registration standard working?
The APA believes that the current standard is working well, however the APA feels that the standard could be clearer and easier to understand to benefit newly qualified physiotherapists who have little or no experience of insurance for professional practice.
2. Is the content of the draft revised Registration standard: PII arrangements helpful, clear, relevant and more workable than the current standard?
The APA feels that the wording of the revised standard is clear and concise. Of particular use to newly qualified physiotherapists are the "What must I do" and "What does this mean for me" sections.
3. Is there any content that needs to be changed or deleted in the draft revised Registration standard: PII arrangements?
The heading reading "does this standard apply to me" could be replaced with a bold statement saying

**Registration standard: Professional indemnity insurance arrangements**

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

"This standard applies to all registered physiotherapists except those with student or non-practicing registration".

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

The APA feels that there could be some consideration of coverage for the teaching of physiotherapy to a general audience. A complaint could arise from a situation where a physiotherapist presents an exercise or technique in a teaching or education session, and a person who is not a patient of that physiotherapist injures themselves as a result of following this general advice.

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

The APA supports the adoption of the 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 APA feels that the current review period of at least every five years is appropriate, but that the word 'generally' should be deleted from this section.

**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 APA believes that the current CPD registration standard is working well, but the document could be clearer and better set out, to enhancing physiotherapists understanding.

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

The APA feels that the revised standard is clear and workable.

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

There is no content that the APA believes should be changed or deleted.

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

The CPD registration standard is silent on the question of whether physiotherapists are required to complete some proportion of their CPD as formal activities, and the APA would recommend that the Physiotherapy Board of Australia give consideration to providing guidance to physiotherapists.

The APA supports the Physiotherapy Board of Australia's statement that learning occurs through a wide variety of formal and informal learning activities. The APA believes that AHPRA should support this statement by requiring a proportion of the requisite CPD hours to include formal learning activities as defined in the guidelines for CPD. The APA strongly believes that this would support quality practice throughout the physiotherapy profession.

**Registration standard: Continuing professional development (CPD)**

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

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

The APA has no further comments on the registration standard.

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 APA feels that the current review period of at least every five years is appropriate, but that the word 'generally' should be deleted from this section.

**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 are the current guidelines on CPD working?

The APA believes that the current CPD guidelines are working well, but the document could be clearer and better set out, to enhance physiotherapists' understanding.

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

The APA feels that the draft revised guidelines are clear and workable.

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

There is no content that the APA believes should be changed or deleted.

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

As discussed in section 10 of this document, the CPD guidelines are silent on the question of whether physiotherapists are required to have some proportion of their CPD to be formal activities. The APA believed that AHPRA should require a proportion of the requisite CPD hours to include formal learning activities as defined in the guidelines for CPD.

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

The APA has no further 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 APA feels that the current review period of at least every five years is appropriate, but that the word 'generally' should be deleted from this section.

**Registration standard: Recency of practice (ROP)**

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

**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?**

Some physiotherapists have expressed that they would like additional clarity about how much practice is required during their period of registration.

There is also a lack of clarity about what is required if a physiotherapist fails to meet the recency of practice standards. The APA acknowledges that the provision of such specific guidance is problematic because each case would need to be assessed on the basis of the physiotherapist's experience, professional development and return to the workplace arrangements. However, it would be useful if the Physiotherapy Board of Australia would publish some hypothetical examples of requirements for physiotherapists who do not meet the recency of practice requirements.

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

The wording of the registration standard is clearer than the current registration standard. However, the APA has set out later in this document its issues with the changes.

The APA also feels that the wording should be consistent between the requirements for the year preceding registration and the years preceding registration.

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

The APA proposes that the following be removed:

To meet this registration standard you must:

- Complete a minimum of 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.

And replaced with

To meet this registration standard you must complete a minimum of:

- 150 hours of physiotherapy practice during the year before the start of the registration period, **or**
- 750 hours of physiotherapy practice during the five years before the start of the registration period.

This will provide clarity for the physiotherapy profession, and ensure that recency of practice is maintained, without reducing the workforce's capacity in an already overstretched profession.

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

Some physiotherapists have voiced concerns about the term 'practice' referring only to face to face clinical contact with patients. Although the definition of physiotherapy practice is clarified later in the document to include non-clinical work such as education, policy development and management, the APA feels that this definition of practice should be more prominent, and appear earlier in the document.

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

The APA believes that the reduced period that will count towards recent practice as proposed in the new draft of the standard may detrimentally affect the available workforce. It will place barriers to return to practice for specific groups of physiotherapists.

The reduction is likely to impact parents taking leave from the paid workforce to raise young children,

### Registration standard: Recency of practice (ROP)

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

particularly if they have two or more children in a short period of time. The APA supports that these physiotherapists should be required to maintain a connection to the profession and to keep abreast of clinical practices to ensure patient safety. However we feel that the proposed changes may unfairly disadvantage well qualified and connected physiotherapists wishing to return to the paid workforce.

Whilst there is no exact data about physiotherapists who are not currently working due to family care responsibilities, there are statistics available from analysis done by Health Workforce Australia which shows the potential issues involved in changing the recency of practice significantly.

In 2012 there were a total of 23,934 registered physiotherapists. 1,031 of these who identified as being in the physiotherapy labour force said that they were on extended leave. A further 609 physiotherapists who identified as not in the physiotherapy labour force said that they were not employed and not looking for work in physiotherapy.

While the reasons for these absences of registered physiotherapist is not included in the data, it is probable that many of these physiotherapists will be caring for young children, and the APA is particularly concerned that these people will be forced out of the physiotherapy profession if they cannot practice within a three year period due to these caring commitments.

#### **Non practicing physiotherapists**

Physiotherapists registered as non-practicing, can be registered as such for up to five years. Under the proposed changes a non-practicing registration period of anything more than 2 years would be problematic if the physiotherapist wished to return to practice.

The pathway to returning to full registration after a period of non-practicing registration is already somewhat problematic for physiotherapists. This problem would be significantly compounded for physiotherapists if the increased recency of practice requirements are reduced, particularly as these physiotherapists are not required to undertake professional development during a period of non-practicing registration.

The APA believes that AHPRA should be very careful to ensure that physiotherapists are aware of the recency of practice requirements if they choose to be registered as non-practicing physiotherapists.

The APA also recommends that this category of registration be reviewed to take into consideration the changes to the recency of practice standards.

#### **Connection with the profession**

The APA supports the contention that physiotherapists must maintain their connection with the profession during periods of absence from the physiotherapy workforce. It is vital that physiotherapists continue to maintain and improve their skills throughout their career, and that members of the public can feel confident that registered physiotherapists have appropriate recency of practice.

In the absence of any evidence to the contrary, the APA feels that the requirement for professional development, and for an ongoing connection to the workplace, in combination with the requirement of 750 hours of professional practice in a five year period, would meet this need.

The APA supports the position that registered physiotherapists should be required to undertake professional development each year. It is unclear however if these activities would count towards recency of practice requirements. The APA believes that formal learning activities as defined in AHPRA's Guidelines for CPD should constitute practice for the purposes of recency of practice.

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?

There are significant changes to this standard that have the potential to impact workforce availability. Therefore, the APA believes that these standards should be revised in three years, with the option to

### **Registration standard: Recency of practice (ROP)**

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review earlier if the need arises.

The APA also believes that AHRPA should collect and collate recency of practice data for all physiotherapy notifications to study any correlation or causative effect of any periods of non practice on the likelihood of receiving a notification.

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

The guidance material for the proposed new standards for recency of practice calls the changes 'relatively minor', however the amendments proposed represent a significant change for physiotherapists. The change effectively changes the recency of practice requirements from five to three years - 40% less time that physiotherapists can absent themselves from practice.

The APA believes this change would have consequences for the physiotherapy workforce, and would disadvantage physiotherapists, despite a lack of evidence that such a reduction would provide an additional level of protection to the public.

The APA therefore does not support the changes to require 450 hours in the three years preceding registration. The APA does however support the contention that 150 hours of practice per year is an appropriate number of hours of practice per year, and that multiples of this number should be used to calculate appropriate recency of practice.

The APA therefore recommends that the standards and guidelines for recency of practice be redrafted as per question 21. This is substantially more hours than the proposed requirements put forward by the Nursing and Midwifery Board of Australia, who propose 150 hours in the year prior to the registration period, or 450 in the five years prior to the registration period.

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

The APA believes that one year is an appropriate period for the definition of a recent physiotherapy graduate.

### **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?**

Some physiotherapists have expressed that they would like additional clarity about how much practice is required to meet recency of practice requirements.

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

The proposed guidelines are far clearer on the topic of how physiotherapists who have not met the standard can re-enter the workforce, and the APA supports the proposed re-entry to practice templates.

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

### Recency of practice Guidelines (ROP)

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

The APA believes that the substantive changes as outlined in the response to the practice standard should be applied to the guidelines.

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

The APA does not believe that there is anything missing from the draft revised guidelines.

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

The APA has no further comments

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?

As there are significant changes to this guideline, the APA believes that it should be revised in three years, with the option to review earlier if the need arises.

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