



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

Response template: Public consultation - proposed *Supervised practice framework* and supporting documents

The National Boards (excluding Pharmacy and Psychology) and Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the proposed *Supervised practice framework* (framework) and supporting documents.

This response template is an alternative to providing your response via the online survey available on [our website](#).

IMPORTANT INFORMATION

Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

The information collected will be used by AHPRA to evaluate the proposed framework and supporting documents. The information will be handled in accordance with AHPRA's privacy policy available [here](#).

Publication of responses

Published responses will include the name of the individual and/or the organisation that made the response.

You must let us know if you do **not** want us to publish your response.

Please see the [public consultation papers](#) for more information about publication of responses.

Submitting your response

Please send your response to: ahpra.consultation@ahpra.gov.au

Please use the subject line: Feedback on Supervised practice framework

Responses are due by: **17 December 2019**

General information about your response

| | |
|--|---|
| Are you responding on behalf of an organisation? | |
| Yes | What is the name of your organisation? Occupational Therapy Australia (OTA) |
| No | Are you a registered health practitioner? Yes/No If yes, which profession(s)? |
| Name (optional) | ████████████████████ |
| Contact phone number (optional) | ██████████ |

Public consultation questions

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the proposed framework and supporting documents.

Use the corresponding text boxes to provide your responses. You do not need to answer every question if you have no comment.

National Boards and AHPRA have developed the *Supervised practice framework* (the framework) and supporting documents to enable a responsive and risk-based approach to supervised practice across the National Registration and Accreditation Scheme (the National Scheme).

The National Boards' preferred option is to adopt the proposed framework and supporting documents.

1. How helpful and clear is the content and structure of the proposed framework? Please explain your answer.

The content and structure of the proposed framework is helpful and sets out the various levels of supervision more clearly than previously.

The word 'consult' is used to describe the interaction between a supervisee and supervisor in the levels of supervised practice (see Section 5 Levels in the framework and the *Fact sheet: Supervised practice levels*). The word 'consultation' is often used to describe the interaction between a patient/client and a health practitioner.

2. Is the meaning of 'consult' clear for the purposes of the supervised practice levels? Why or why not?

There is room for misunderstanding by using this term. As such, for the sake of enhanced clarity of interpretation and application of the framework it may be useful to consider another term or way to describe the interaction between supervisor and supervisee.

The meaning of the term 'consult' in the context of the document however is clear, providing those working with the document are able and have sufficient time available to read the document thoroughly and carefully.

3. Is there any content that needs to be changed, added or removed in the proposed framework and/or supporting documents? If so, please provide details.

No suggested content changes, additions or removals.

4. Are there any other ways that the Board can support supervisees, supervisors and employers involved in the supervised practice arrangement?

OTA receives many enquiries from affiliate members and non-members who are working through supervised practice arrangements and processes. Those making enquiries in this context are often seeking assistance to understand the process.

OTA has received feedback indicating that in general AHPRA staff are not always able to explain the process well, or clearly, when contacted.

Although the framework is clear, perhaps an executive or overall summary document explaining the process very clearly and simply would be beneficial to assist supervisees, supervisors and employers to understand the process.

5. Is there anything else the Board should consider in its proposal to adopt the framework and supporting documents, such as impacts on workforce or access to health services?

OTA has received feedback from affiliate members and non-members that there are occasions in which a significant period of time can pass while supervision approvals and agreements undergo processing. The lengthy period of time places the person seeking full registration at risk of losing job opportunities.

Although OTA understands that lengthy time periods for approvals and agreements can be hard to avoid, perhaps some clarity around expected timeframes would be beneficial.

Please note as well that occupational therapy is a profession experiencing major workforce shortages at present. As a female dominated profession, we have many occupational therapists taking significant career breaks at all levels of their work life to care for others and contribute to family life. There is an imperative need to support these professionals to return to practice, rather than adopting punitive measures or measures that impede incentives for these professionals to return to practice.

6. Do you have any other comments on the proposed framework and/or supporting documents?

No further comments, other than that AHPRA is to be congratulated on achieving enhanced clarity in the proposed framework.

Thanks!

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the proposed framework and supporting documents.