



Review of regulatory settings relating to registration and qualification recognition for overseas health practitioners

The Occupational Therapy Council (OTC) seeks to provide input to the review of regulatory settings relating to registration and qualification recognition for overseas health practitioners.

Occupational Therapy workforce: Current and projected skills shortages

Despite the increasing number of undergraduate occupational therapy programs being established across Australia many states and territories still report an inability to fill advertised positions (Occupational Therapy Australia, 2022). Added to which the demand for occupational therapy services continues to grow due to the increase of older people in the population and their associated needs, the implications of the National Disability Insurance Scheme as well as the government commitment for improved services for mental health and suicide prevention – all key areas in which the occupational therapy profession is employed (Occupational Therapy Australia, 2022).

The increased demand for services as well as barriers to workforce retention means there is likely to be an ongoing shortage of occupational therapists into the future. Health and care workforce shortages have been identified by recent studies, for example National Skills Commission (2021). To date, the need to increase access for internationally qualified occupational therapists above the current trend of numbers, has not been identified as a means to address the workforce. Strategies for maintaining and increasing the workforce continue to focus on supporting education program numbers, career structures and addressing regional workforce issues.

Concomitant with the above, the OTC has seen an increase in the number of internationally qualified occupational therapists seeking to practise in Australia as outline in the table below. Please note the data relating to Stage 1 and 2 is for the calendar year whereas the data relating to Certificates of Practical Completion (COPC) is for the financial year. In the 2023 calendar year to the end of February OTC has received 126 Stage 1 assessment applications and 48 Stage 2 applications, and issued an 130 COPCs within this financial year.

Table 1: Overseas trained applicants 2018-2022

	2018	2019	2020	2021	2022
Stage 1 Desktop audit	191	207	226	337	348
Stage 2 Supervised Implementation Plan	97	103	97	113	202
Certificate of Practical Completion	87	88	89	103	104

N.B. Stage 1 & 2 data is reported on calendar years and COPCs on financial year.

Assessment for registration of internationally qualified occupational therapists: Strengths and weaknesses of current regulatory settings.

The occupational therapy process focuses on the applicant demonstrating and evidencing the required professional behaviours associated with each of the four competency standards established by the Occupational Therapy Board of Australia. To demonstrate safe and competent practice, an applicant is assessed in a practice setting under supervision of a registered occupational therapist. OTC has a designated subcommittee, Overseas Qualification Assessment Committee (OQAC), to oversee the process. Administrative structures are in place to monitor progress of applications and to ensure smooth transition of the applicants through each step.

In line with the NRAS Aboriginal and Torres Strait Islander Health Strategy, requirements to address client safety and cultural responsiveness have been strengthened. As part of the process, all applicants are required to complete a cultural responsiveness and awareness training program successfully that consists of three levels, the first two of which can be undertaken prior to arrival in Australia during Stage 1 of the process. Further details of the process can be found at <https://www.otcouncil.com.au/assessment/>

The process used by the OTC to assess, and support internationally qualified occupational therapists gain registration is different from many other allied health professions in that it does not require the applicant to sit a scheduled exam. This means the process can be more flexible and responsive to in time demands. Brief outline of application stages

Stage 1 Desktop assessment

All applicants need to have graduated from a training program that has been accredited by the World Federation of Occupational Therapy, thereby assuring an appropriate level of education/training. This is checked as part of the Stage 1 process.

Stage 2 Supervised practice

Stage 2 requires the applicant to secure a position (voluntary or paid) for six months (based on full-time practice) with an occupational therapy provider who is willing to provide supervision of a specific nature. In collaboration with the supervisor, the applicant develops a Supervised Practice Implementation Plan in which they identify the activities they plan to undertake in order to demonstrate each of the 52 professional behaviours associated with the four competency standards. They also need to determine what measures will be used to determine the extent to which each professional behaviour will be evidenced in the practice setting. This proposed Supervised Practice Implementation Plan is reviewed by two OTC occupational therapy assessors. The assessors can require revisions and provide input if needed, via email or phone, to ensure the plan will provide opportunity for the applicant to demonstrate the required professional behaviours.

At the midway stage, a report is submitted to the OTC outlining progress made via reflections and outcome measures along with a supervision log to evidence occasions of direct practice observation as well as content of supervision sessions. This midway report is reviewed by the two OTC assessors and feedback to the applicant is provided. If the midway report evidences the applicant is demonstrating all the professional behaviours, they can be invited to submit their final report. Alternatively, the applicant will continue with their supervised practice and at the end submit the final report, in similar format. The OTC assessors review the report to ensure evidence of achievement and make a recommendation as to whether the applicant has or has not successfully completed. At this point, a COPC is issued.

Impact of the pandemic on the OTC process

During the early phases of the pandemic, the OTC reviewed processes to ensure the assessment process would continue and not unduly hamper applications for registration to practise in Australia. Surprisingly the number of occupational therapy applicants did not decline and Stage 1 and 2 processes continued. The system was adapted to allow the introduction of telehealth where this was being used in practice settings. More occasions

of remote supervision were allowed. The requirement for direct practice observation remained and was achieved via the use of Zoom, or similar, or the recording and review of sessions if necessary. Local organisational protocols for consent and use of video/Zoom were abided by as an important part of patient confidentiality.

The OTC process for assessing the suitability of internationally qualified occupational therapists for registration in Australia has proved to be nimble and responsive to issues created by the pandemic and increased applicant numbers. Additional assessors were sought and provided with onboard training to address the increase in applicants, and appropriate remuneration is provided to the assessors for the work undertaken. While enquiries and requests for assistance to manage the process increased, from both applicants and supervisors, few issues of concern or complaints were raised. In fact, positive feedback was received, so the flexibility will continue.

System complexity and restrictive barriers

Feedback from applicants and supervisors about the OTC processes does not suggest specific barriers to be addressed. Challenges however remain in supporting internationally qualified practitioners who arrive in Australia and are contracted to work in sole positions and/or in rural areas. Recruitment from a range of providers has increased in recent years, and areas of practice have diversified. As mentioned previously, the introduction of cultural responsiveness training into the process aims to address important practice competencies.

Identification of workplaces and supervisors to be part of the process is at times an issue for applicants. However, the recent trend mentioned above also suggests providers are recruiting internationally qualified therapists with a plan already in place for supervised practice to be arranged.

The recent introduction of a revised supervision framework has meant some changes to administrative processes currently being introduced in conjunction with OTBA. OTC has maintained a focus on accurate and timely information to applicants in order to navigate the regulatory requirements.

Conclusion

While the ongoing workforce shortages continue, the OTC remains diligent in the aim to provide a timely and smooth process for internationally qualified occupational therapists, while maintaining the need for a high level of safety and competence of the workforce.

The opportunity to participate in this review is appreciated. Further information can be provided if required, and we are very willing to participate in discussion of issues.

References

Australian Government, 2021, *National Skills Commission: The state of Australia's skills 2021*. Accessed 6 March 2023 https://www.nationalskillscommission.gov.au/sites/default/files/2022-03/2021%20State%20of%20Australia%27s%20Skills_0.pdf

Occupational Therapy Australia, 2022, *Australian Government, The Treasury 2022-23 pre-budget submission*. Accessed 6 March 2023 https://treasury.gov.au/sites/default/files/2022-03/258735_occupational_therapy_australia.pdf