Occupational Therapy Australia Submission on the Discussion Paper:

Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme (NRAS) for Health Professions February 2017

Submitted: 1st May 2017

P1 – The Review in Context

Occupational Therapy Australia welcome the purpose and questions posed in the review (to propose improvements to the system within the existing framework, to ensure the relevance and responsiveness of health education, to ask the broader question of how can education and training, and its accreditation, help create the workforce that Australia needs, both now and in the future). These are crucial areas to address, particularly the last point.

P2 – Improving efficiency

Although addressed later in the document, the potential improvements in efficiency of accreditation systems may also result in additional benefits, such as an increased focus on interprofessional education at pre-registration level.

P2 – Relevance and responsiveness

Occupational Therapy Australia welcome the encouragement of a greater focus on broader workforce priorities and the outcomes of health education programmes in curricula. However, Occupational Therapy Australia has misgivings about the use of national examinations to deliver “work ready” graduates – the pedagogical literature on examinations suggests that they tend to test whether people are good at sitting them, rather than the actual knowledge base it is hoped they will test (Lave, 1997). In addition, the softer skills that are part of being work-ready – professional behaviour, self-management and communication – are difficult to assess through examination. Being a work-ready graduate
is more than having a knowledge base. Meeting competency standards is a better approach.

**P3 – Consolidated list of issues: The delivery of work-ready graduates**

Occupational Therapy Australia would not support a period of supervised practice as a pre-condition of general registration, although we are aware other professionals use this. If the professions were to harmonise, our preference would be not to take this on. Occupational therapy students are required to complete 1000 hours in the field during their training (World Federation of Occupational Therapists, 2016), which provides them with the professional practice experience to commence working in the full capacity of their first role.

**P3 – Consolidated list of issues: National examination**

Occupational Therapy Australia would agree with the statement that a robust accreditation process would negate the need for further national assessment.

**P7 – Consolidated list of issues: Assessment of overseas health practitioners**

Point 35: Occupational Therapy Australia is aware that it is challenging for overseas health practitioners to arrange supervised practice, and it is a significant burden on organisations who wish to take on overseas health practitioners – in occupational therapy those practitioners are usually senior and experienced, so potentially highly beneficial to an organisation.

**P8 – Background to the review**

Occupational Therapy Australia welcome approaches which reduce duplication in the accreditation system.

**P23 – Alignment with TEQSA**

Occupational Therapy is one of the professions where the accreditation councils’ standards currently contain no reference to TEQSA. Occupational Therapy Australia welcome approaches which reduce duplication in the accreditation system, thus there may be opportunities to make use of the education regulators’ assessments of education providers in areas such as Institutional Quality Assurance, Governance and Accountability within profession-specific accreditation, thereby bringing the profession in line with other professions who do reference TEQSA.

**P35 – Input and outcome based accreditation standards**

Occupational Therapy’s accreditation standard 4.2 sets out the minimum requirement for fieldwork hours in a pre-registration course, and is input based. This standard is a
requirement of the World Federation of Occupational Therapists’ Minimum Standards for the Education of Occupational Therapists (2016) and would need to remain. If not clearly stated, programmes may not be able to be accredited with the World Federation, placing programmes and the universities that run them, potentially at risk as students seek this (it is difficult to register to practice as an OT in other countries without having attended a WFOT accredited programme).

P40 – Interprofessional education, learning and practice

Occupational Therapy Australia would support a national coordinated approached to Interprofessional Education.

P41 – Clinical experience and student placements

Occupational Therapy Australia is aware of the challenge to both universities and services of providing sufficient clinical placements for students. The issues are complex and broad-ranging, with some states and services using a fee system, and some not. Occupational therapy students are required to experience a diversity of placements (WFOT, 2016), and this is difficult to achieve in the current climate.

P41 – Relevance of placements to support future health service delivery

Occupational Therapy Australia welcome the use of flexible and creative placements in expanded and non-traditional settings, which are already the norm in occupational therapy education. Furthermore, the definition of “non-traditional” is considered by Occupational Therapy Australia to be more than merely outside the acute sector, but to include non-government and private sector services that provide health and social care, and also settings where health and social care are not the primary focus, such as prisons and detention centres (Hunter & Volkert, 2016). Occupational therapists have been working in non-traditional settings for many years, indeed since the profession’s inception.

P42 – Simulated clinical experience

Occupational Therapy Australia welcome the use of simulated clinical experiences, to help address the difficulties and challenges in sourcing placements for occupational therapy students and would encourage all education providers delivering occupational therapy education to make use of well-designed simulation for up to 20% of the required 1000 fieldwork hours, in line with evidence based research completed by members of the occupational therapy profession (Rodger et al, 2010). This percentage is cited in the current occupational therapy accreditation standards (see Std 4.1 and explanatory document:
P43 – The delivery of work-ready graduates

Occupational Therapy Australia welcome the consideration of what work ready means, and stress the importance of the responsibility of employers to provide induction, support, orientation, mentoring/supervision, and further development and education, in order to assist new graduates to develop their skills and acclimatise.

Occupational Therapy Australia agree that work ready gaps are usually to do with the new graduate functioning as a professional within a system, and there is significant literature to support this (Eraut et al, 2004). Occupational Therapy Australia make the point that a national examination will not address this gap.

Occupational Therapy Australia welcomes the recommendation of an approach to training that provides mentoring and support to new graduates in the early phases of employment and beyond.

P45 – National examinations

Occupational Therapy Australia questions the pedagogical approach of a national examination, and its ability to provide, as stated in the discussion paper, the ability to determine critical thinking, problem solving, ethical reasoning, independence, and readiness for practice. As previously stated, Occupational Therapy Australia would not support the introduction of a national examination.

P49 – Interdependence of registration and accreditation

Occupational Therapy Australia does believe that its National Board has the appropriate skills, knowledge, and incentives to determine accreditation standards and programs of study which best address workforce needs in a rapidly evolving health and social care system.
References


