

24<sup>th</sup> July 2011

**ATTENTION:**

Physiotherapy Board of Australia  
Level 7 / 111 Bourke Street  
MELBOURNE VIC 3000  
*By email*

Dear National Board members,

Re: **CONSULTATION DRAFT:  
LIMITED REGISTRATION & SUPERVISION STANDARDS & GUIDELINES**

The South Australian Board of the Physiotherapy Board of Australia is pleased to provide the following comments in response to the call for submissions regarding this consultation paper and thanks you for the opportunity to provide feedback.

1. There is a great deal of repetition between the Registration Standards for the 3 categories of Limited Registration documents and the Guidelines for the 3 categories. The SA Board queries the need to repeat the wording in each *verbatim*, but rather suggests that the Standards be more streamlined, with the Guidelines carrying the in-depth practical advice for applicants and potential supervisors to comply with the Standards.
2. However, if consistency of language and repetition is what the Board intends, then there are several instances where there are small inconsistencies or discrepancies in terminology, eg For postgraduate training or supervised practice, P2, point 5: In the rest of the documents the wording at the end of the sentence is 'or if a repeat of a component of the program is **indicated**' (See p3, point 5).  
P3, point 3: In the 'Guidelines' this sentence is finished with 'will be provided to the Board by the APC **after the individual's application**' - should be added for consistency.
3. We applaud the Board for aiming for consistency on the issue of "Limited Registration in the Public Interest" between states, but feel that there will now be a number of registrants who were granted some form of registration with the previous State Board/s, who now will not be eligible for registration. The SA Board wonders if the restrictions now work against the public interest, by precluding a range of practitioners from work. The obvious example is overseas qualified physiotherapists with a Working Holiday Visa (WHV), who are not aiming to complete the APC exam, as they are intending to return to their country of origin. These people no longer qualify for "Supervised Practice", nor for "In the Public Interest", now that this category is being more tightly controlled. It is reasonable to suggest that these overseas physiotherapists have previously plugged gaps in country (or other) areas on a temporary basis, particularly as a condition of the WHV is to limit employment with one employer to (we believe) a 12 week period to encourage travel. Can "public interest" be

broadened slightly to accommodate contingencies other than natural disasters, such as short term employment needs, international exchanges etc, without leaving the door open for unintended use/abuse?

Furthermore, have the practicalities and logistics of restricting Limited Registration in the Public Interest to mainly natural disaster scenarios been fully considered? If natural disasters were to require employment of overseas physios (in the Public Interest), it is likely that they may not yet have a host employer, and the short turn-around time may work against the newly required standards (eg sitting an English language test, getting an APC assessment etc). Would this scenario be a better fit for a ministerially-proclaimed "Area of Need"?

4. In the Public Interest, P5, point 3: In both the standard (and the guidelines) it reads... "the Board is the arbiter of whether a position is in the public interest". In light of the legal ruling (which the SA Board requested) on the inability of the National Board to overturn a ruling by a State/Territory Board, is it strictly more correct to say "the Board (or the relevant State/Territory Board under delegated authority from the Board) is the arbiter....."?
5. In the Public Interest, P5, point 4: The wording at the end of the sentence differs from the guidelines and other standards, but for consistency should be ..."for the specific date(s), locations(s) and scope/areas of practice", ie, delete '**of practice**' after locations(s) and add plural to date.
6. For teaching or research, P7, first para, end of sentence: "the Board must decide a review period for the condition". Should an additional sentence be added to state..."This would be for no more than 12 months and may be extended if the limited registration is renewed". This may be self evident, given the period of registration, but may help to reinforce the time frame.
7. Guidelines for Limited Registration, P5 'Do course presenters from overseas need to be registered? For consistency with Appendix 2 (9) in the Supervision guidelines, this should read "course presenters **or speakers at a conference**".
8. Supervision Guidelines, Introduction, P2 paras 7 & 8, beginning "When a physio seeks to return to practice...." and "Supervisory requirements may also be imposed for ....." are repeated but summarised better on P3, under "Who needs to use these guidelines". Is it necessary to be so reiterative? We suggest making the dot points on P3 clearer, explaining if they apply to either supervisors or supervisees, include the paragraph that follows under "Exemptions" and refer the reader to Appendix 2, which we feel is very helpful.
9. Supervision guidelines, typo P3 after "Appendix 2" in bold, space missing.
10. Levels of supervision pp 5, 6; Suggest using supervisor/supervisee wording consistently, as Levels 3 & 4 start using "physiotherapist" term, which is somewhat confusing.

11. Supervision Guidelines, P5, Level 1 Supervision, c): Suggest adding “Supervision via telephone **or remote (eg email)** contact is not permitted.
12. Supervision Guidelines, P5, Level 2 Supervision, b): Suggest “the secondary supervisor” be changed to “**a nominated second supervisor**”.
13. P7 at the bottom of “Procedure for Supervisors”: “practice must cease and the supervisee must start the supervision process from the beginning”. Does this just mean the Supervision agreement etc? – Does the Board feel that the entire Plan needs re-doing?
14. P8 - Point 7: refers to “individual”. Re-word to “supervisee”.
15. P9, bottom of page, point 1: Should “or re-entry” be added to this point after “course or program or to undertake assessment or examination...” for clarity – we realise this may already be included implicitly.
16. The SA Board has had recent issues with potential supervisors, who, in the opinion of the Board, do not fully understand the concept of “Supervision activities and allocated time”. Some potential supervisors appear confused as to whether this relates to 1:1 time spent solely with the supervisee on a specific “activity” or whether it relates to time spent in the presence of the supervisor, conducting clinical practice and tasks. The Board believes that more practical guidance on appropriate completion of the Supervision Plan is vital for both prospective supervisors, as well as the Board assessing the Plan. The Board also opined that providing exemplars would greatly assist in educating prospective supervisors about the important role they are assuming.
17. In two recent applications received by the SA Board, prospective supervisors added a letter outlining their supervision approach and strategies, in addition to the Supervision Plan. The Board found this descriptive summary added value to the application and enabled us to adjudge information presented both qualitatively as well as quantitatively. The Board felt that it may be worth the PhysioBA’s consideration to include provision for a summary letter in future applications.
18. The Board anticipates that the level of supervision could change during the supervised period (e.g. at 3 monthly reporting intervals), in line with improvements in the supervisee’s demonstrated skills and clinical practice. In fact, one would hope that a supervisee requiring intensive supervision initially should improve with time to require less supervision, prior to being bestowed with General Registration! However, there is nowhere for the supervisor to nominate a change of supervision level on the Progress Chart – Form D or Supervision Plan Updates – Form E. Should this provision be added to these forms? – along with accompanying explanatory notes in the Guidelines to guide supervisors accordingly?
19. Form A could include the Registration numbers of the 2 Supervisors (to help identify them on the register and to aid in de-identifying future Board Minutes).

20. Form A (p 16) refers to 'Orientation to the Australian Healthcare system'. Is there a benchmark or reference document or guidelines available to assist the supervisor in conducting this orientation program with the supervisee? How will consistency be achieved otherwise?
21. Page 14 – para 7: Change “documented” to “document”.
22. Final page “Checklist” would be easier to read if Forms include their full title (eg “*Supervision Plan*”) and checklist chronology could be clearer. Recommend that the documents needing to be submitted are listed under each time frame, ie  
“Documents to be submitted (by whomever...) with application.....”  
“Document to be submitted (by whomever...) within first month of supervision.....”  
“Documents to be completed monthly (by whomever...) and submitted every 3 months.....”  
Current checklist is very confusing.

Again the Board felt that providing exemplars for each of the forms (D & E) would greatly assist in educating prospective supervisors and ensure meaningful, consistent information is provided to the Board.

Thank you again for the opportunity to respond to these important consultation documents.

Yours faithfully

**SA BOARD OF THE PHYSIOTHERAPY BOARD OF AUSTRALIA**



**Jo Bills**  
**Chair**

cc: Mr John Herrmann, Manager, Health Practitioner Registration, AHPRA