

The Department of Health and Aged Care

***A New Model for Regulating Aged Care
Consultation Paper No.1***

Occupational Therapy Australia submission

Oct 2022

Introduction

Occupational Therapy Australia (OTA) welcomes the opportunity to lodge a submission to The Department of Health and Aged Care on the new model for regulating aged care.

About OTA

OTA is the professional association and peak representative body for occupational therapists in Australia. As of July 2022, there were more than 26,750 registered occupational therapists working across the government, non-government, private and community sectors in Australia. Occupational therapists are allied health professionals whose role is to enable their clients to engage in meaningful and productive activities.

What is occupational therapy?

Occupational therapists provide services such as physical and mental health therapy, vocational rehabilitation, chronic disease management, assessments for assistive technology and home modifications, and key disability supports and services.

Occupational therapists have a critical role in providing services across the health system, supporting people affected by physical, intellectual, acute, and chronic conditions, and mental health issues. Occupational therapists work in a diverse range of practice settings including acute hospitals, rehabilitation settings, private practice, aged care facilities, community, primary health and in the home.

Occupational therapists work with older people with age-related conditions such as poor balance and coordination, memory loss and confusion, and vision and hearing loss, which lead to changes in their ability to participate in the meaningful activities of everyday life. Occupational therapists provide services such as physical and mental health therapy, vocational rehabilitation, chronic disease management, assessments for assistive technology, and the assessment of environment and safety risks.

Registration Obligations

OTA acknowledges that a reforms around aged care regulation is necessary to provide a rights based and person centred aged care system that keeps older Australians safe. A worker registration scheme is a necessary part of this proposed regulation.

However, the worker registration scheme should not become an unnecessary burden on health professionals such as occupational therapists that already have comprehensive regulatory requirements.

Under the National Registration and Accreditation Scheme, occupational therapy is already strictly regulated by the Occupational Therapy Board of Australia (the Board). Administered by the Australian Health Practitioners Regulatory Authority (AHPRA). the Board:

- Develops standards, codes and guidelines for the profession
- Approves accreditation standards and accredited courses of study
- Registers occupational therapy practitioners and students

- Handles notifications, complaints, investigations, and disciplinary hearings
- Assesses overseas practitioners who wish to work in Australia

To become a registered occupational therapist, an individual must complete an accredited undergraduate degree and meet all registration requirements set by the Board. These standards cover criminal history, English language skills, professional indemnity, and insurance arrangements, continuing professional development (CPD) and recency of practice). Occupational therapists must also renew their registration annually and demonstrate that they continue to meet the Board's registration standards.

Screening or further registration requirements for occupational therapists would result in the duplication of existing regulatory functions. Such duplication is not only unnecessary it has the potential to disrupt workforce attraction and retention due to increased regulatory burden and cost.

Information sharing

OTA welcome any regulatory changes that ensure systems and infrastructure that allow consistent approaches to information sharing and communication among key stakeholders and bodies. Inefficient systems across the aged care sector not only place pressure on our workforce through administrative burden, but also place the care of our consumers at risk.

Systems that align information sharing pathways and embedding them within secure interconnected platforms will deliver more efficient use of data. It will support all care providers, including occupational therapists, to support optimal clinical outcomes and will assist with regulatory compliance. Most importantly, it will improve the experience for consumers receiving aged care services and provide an infrastructure that goes some way to achieving the continuity of care pathways recommended by the Royal Commission.

Transitioning

Changes such as those proposed under the regulatory reform require a considered and well-structured approach to minimise unnecessary disruption or stress to the aged care sector or consumers. The transition process must be transparent, utilise existing systems to maximise efficiencies, and minimise financial burdens for a sector that is already under strain. It must include the views of all key parties and pay special attention to the needs of marginalised groups. And to ensure reform changes are meeting the changing needs of the sector and fostering continual improvement, it must also have robust and ongoing evaluation and review systems in place.

Contact

OTA would welcome further consultation, particularly in areas that specifically impact occupational therapy and allied health practice.

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