



POLICY AND PROCEDURE

STAGE 2 – PERIOD OF SUPERVISED PRACTICE

April 2019

Glossary

AHPRA	Australian Health Practitioner Regulation Agency
COPC	Certificate of Practical Completion
EO	Executive Office - OTC
OTC	Occupational Therapy Council of Australia Ltd
OTBA	Occupational Therapy Board of Australia
PA	Professional Adviser – Overseas Qualified Assessment Committee
OQAC	Overseas Qualified Assessment Committee

Clarification of the roles of the OTBA, OTC and AHPRA and their role in the process leading to general registration to practise independently in Australia:

OTBA

The functions of the OTBA include:

- developing standards, codes and guidelines for the occupational therapy profession;
- approving accreditation standards and accredited courses of study;
- registering occupational therapy practitioners and students;
- handling notifications, complaints, investigations and disciplinary hearings;
- assessing internationally-qualified practitioners who wish to practise in Australia.

OTC

- For registration purposes: The OTC is the assessment authority appointed by the OTBA to undertake the assessment of internationally-qualified practitioners

These functions are supported by AHPRA.

AHPRA

AHPRA is the organisation responsible for the implementation of the National Registration and Accreditation Scheme across Australia. It supports the OTBA. Documentation in relation to gaining registration is provided to AHPRA.

Supervision Agreement

Upon obtaining a position and identifying a supervisor for the period of supervised practice, the practitioner is required to forward a signed supervision agreement with the curriculum vitae of the supervisor to the OTC.

The EO reviews this agreement and forwards this to the AHPRA with clarification of when Stage 1 was approved. The AHPRA will advise the OTC of approval of the supervisor, and the OTC will confirm acceptance of the supervision agreement to the practitioner and supervisor.

Once limited registration has been granted, the practitioner is able to commence the period of supervised practice in the approved position with the approved supervisor.

AHPRA will also advise the OTC when limited registration has been granted to the practitioner. The OTC will clarify with the practitioner the date the period of supervised practice will commence.

Summary

- Practitioner and supervisor forward completed supervision agreement and supervisor's CV to OTC.
- EO reviews and advises OTBA of approval.
- AHPRA confirms approval of supervisor and advises OTC accordingly.
- OTC advises practitioner of confirmation, clarifying location and approved supervisor.
- AHPRA advises date limited registration is granted to the practitioner.
- OTC to clarify commencement date with practitioner.

Stage 2 Application Form and Supervised Practice Plan

The Stage 2 application and supervised practice plan is used by the practitioner, supervisor and the OTC to determine learning goals and activities appropriate to the practitioner's current level of competency, as well as encompassing the current job specifications. The supervised practice plan is developed using the competencies within the Australian Minimum Competency Standards for New Graduate Occupational Therapists (2010). The supervised practice plan must be completed in the OTC format, an example of which can be found in the "forms" section of the OTC website. Altered formats will not be accepted.

Within **two (2) weeks** of commencing the period of supervised practice, the practitioner must submit a Stage 2 application and supervised practice plan to the OTC. The Stage 2 application and supporting documentation and supervised practice plan need to be signed by both practitioner and supervisor.

If the Stage 2 application is not received by the OTC within two weeks of the practitioner commencing, the EO will advise AHPRA as this may be in breach of the conditions of limited registration.

Revisions of the supervised practice plan must be received by the OTC within two weeks of practitioner being advised of the need to revise the supervised practice plan. Unless extenuating circumstances are received within the two-week period, failure to comply with the OTC revision requirements will result in the OTC EO advising the OQAC of non-compliance. OQAC may then decide to withdraw the period of supervised practice. AHPRA will be advised of any decision of the OQAC.

Supporting Documents required for the Stage 2 application

- Payment.
- OTC Stage 2 application form signed by both practitioner and supervisor.
- OTC Stage 2 Supervised Practice Plan signed by both practitioner and supervisor.
- Job description.
- Orientation to the Australia Healthcare System (Appendix 5 available on the OTBA website).
- CVs of practitioner and approved supervisor.

Orientation Agreement

AHPRA requires all internationally-qualified practitioners to include evidence of orientation to the Australian healthcare system as part of the period of supervised practice. Practitioners are required to complete the “Orientation to Australian Healthcare System – Appendix 5” available on the OTBA website. This document should be forward directly to AHPRA and form part of the OTC Stage 2 application documents.

The EO will check all the correct documents have been provided, payment has been received and commence a checklist. The Stage 2 application and associated documents including checklist are forwarded to the PA and one committee member for review and approval.

Both the PA and committee member will review the application and provide feedback to the EO with a copy of the completed checklist. This feedback will either require additional information from the practitioner or confirm approval of the Stage 2 application.

On receipt of clarification, if required, the updated information is then forwarded to the PA and same committee member for review. Feedback is then provided to the EO to either obtain further clarification or approval of the application.

On approval of the application, the practitioner will receive confirmation from the EO outlining location of period of supervised practice, commencement date and dates for receipt of progress and final reports. A copy of this confirmation is forwarded to AHPRA.

Summary

- Stage 2 application received by OTC and checked by EO for payment and correct documents have been provided.
- Complete application forwarded to PA and one committee member for review.
- PA and committee member complete checklist and return to EO with a requirement for additional information or approval of application.
- If required, EO to request further information from practitioner and upon receipt of this forward to PA and same committee member for further review or approval.
- Upon approval by both PA and committee member, EO provides written confirmation to the practitioner, with a copy to AHPRA, outlining practice location, name of supervisor, commencement date, period of supervised practice and dates for production of progress and final reports.

The PA is available to assist the practitioner and supervisor to develop a suitable plan if necessary. This may include advice regarding learning activities, supervision requirements, development of professional competencies or difficulties between supervisor and practitioner related to professional competencies and use of the supervised practice plan as a competency tool.

Approval may be given to undertake supervised practice in more than one workplace. In this instance, a Stage 2 application and supervised practice plan must be submitted and approved for each individual workplace. The practitioner will not be provided a Certificate of Practical Completion until all supervisors have attested to the practitioner's achievement of competence and endorsed independent practice.

Progress report

After three months' full-time practice (or the equivalent part-time supervised practice) the practitioner must submit to the OTC a progress report and supervision log. Once received, this will be forwarded to the PA and OQAC assessor to determine if competence has been met. If any clarification is required, the details of this will be provided by the PA to the EO, and the EO will then contact the practitioner to provide additional information.

If the OQAC assessor and the PA determine the practitioner has met competence, the practitioner and supervisor will be invited to submit the OTC Stage 2 final report and the OTBA Stage 2 supervisor's report for final assessment, following which the EO will be advised if the practitioner has completed the period of supervised practice satisfactorily. A COPC will then be issued to the practitioner.

Summary

- OTC progress report forwarded to OTC.
- EO to review and forward to PA and preferably the same OQAC assessor assessing Stage 2 application.
- Feedback – further information or approval – from both assessors to EO.
- Upon approval, practitioner and supervisor invited to submit OTC Stage 2 final report and OTBA Stage 2 supervisor's report for final assessment by PA and OQAC assessor.

Final Report

At the conclusion of the period of supervised practice, the practitioner will forward to the OTC the OTC Stage 2 final report, supervised practice plan with self-reflection and supervision log (if requested), together with the OTBA Stage 2 final supervisor's report. All documents are signed by both the practitioner and supervisor.

Once checked by the EO, these documents are forwarded to the PA and OQAC assessor for review and approval.

If clarification is required, this is relayed to the EO who will communicate with the practitioner to obtain this.

Both the PA and the OQAC assessor must approve the final reports and advise the EO of this approval.

Once approval by both parties has been received, the EO will prepare and forward to the practitioner a COPC, and a Certificate of Appreciation to the supervisor. AHPRA is advised when the COPC has been issued, the number assigned to that certificate and provided with a copy of the OTBA supervisor's report.

Summary

- Stage 2 OTC final reports and Stage 2 OTBA supervisor's report received by OTC.
- EO to review and forward to PA and OQAC assessor.
- Feedback – further information or approval – from both assessors to EO.
- Upon approval, COPC forwarded to practitioner.
- Information deleted from assessor's computer.
- AHPRA advised of COPC number and provided with Stage 2 OTBA supervisor's report.

Document Security

Once approval has been provided, the OQAC assessor must delete all records relating to the practitioner from their computers.

Supervision

As a minimum, it is expected the supervisor provides weekly supervision (preferably face-to-face however telephone or Skype or similar is acceptable) with the practitioner for at the first six weeks to implement the supervised practice plan and to assess competence. A supervision log must be maintained to document supervision.

During the period of supervised practice there must be direct observation by the supervisor during the assessment and treatment of clients. This should be demonstrated as a goal in the supervised practice plan and be recorded on the supervisor log.

The frequency of supervision, after the first six weeks, may reduce to fortnightly until the practitioner is assessed as competent across all levels of competency standards.

The supervisor will be required to:

- assist the practitioner to develop the supervised practice plan, identifying learning objectives and learning activities, and areas for development throughout the period of supervised practice;
- support the practitioner in occupational therapy practice to ensure development of competence across all areas;
- direct the practitioner to relevant resources in order to develop competence;
- demonstrate occupational therapy practice skills to the practitioner within the Australian healthcare context;
- review intervention plans and documentation;
- observe the practitioner in the provision of occupational therapy services;
- provide feedback through regular supervision sessions;
- sign off on all sections of the progress report;
- complete the Stage 2 OTC final report and the Stage 2 OTBA supervisor's report at the conclusion of the period of supervised practice.

Should the nominated supervisor for any reason be unable to continue to supervise the practitioner within the same workplace, another suitably qualified occupational therapy supervisor must be nominated.

This change, along with a new supervision agreement and CV of the new supervisor, must be submitted to the OTC for approval as soon as the practitioner is aware of a change taking place. The OTC will then send the new supervision agreement to AHPRA for supervisor approval.

If two supervisors have been nominated and approved for the duration of the supervised practice period, the supervisors must confer regarding the practitioner's progress prior to the completion of any assessment report. It is not appropriate for the practitioner to provide communication between two supervisors.

A supervisor may only provide supervision of up to three practitioners at one time who are undertaking a period of supervised practice in compliance with OTC or OTBA requirements.

'Guidelines for Supervision' are available to all supervisors and practitioners on the OTC website.

Duration of Supervised Practice

The period of supervised practice is based on six months full-time equivalent (30 hours of practice per week), however at the midway point (three months full-time, six months part-time) the practitioner will provide the OTC with a progress report and supervision logs.

Depending on the assessment of these documents, the practitioner and supervisor may be invited to submit final reports which will reduce the period of supervised practice. The MINIMUM period for a period of supervised practice therefore is three months full-time based on 30 hours per week (six months based on part-time).

If the practitioner is not assessed by the supervisor as competent within the first six months, the supervisor and practitioner will be required to review the supervised practice plan, learning goals and strategies, and forward the updated plan to the OTC. If required, the PA will contact the practitioner and supervisor to offer support and advice regarding activities and resources to assist in the achievement of competencies.

The duration of supervised practice is expected to be no more than 12 months.

Change of Employment Position

Where a change in place of employment occurs during the period of supervised practice, the practitioner will be required to provide a new supervision agreement, Stage 2 application and supervised practice plan prepared in conjunction with the new supervisor.

Depending on when during the period of supervised practice the change occurs, the first supervisor may be required to complete the progress report with the new supervisor assuming the responsibility for completing the final documentation.

The practitioner will be required to undertake at least three months of supervised practice in their new supervised practice position in the event of a change of employment but can count their previous hours within the full number of hours completed in supervised practice.

Supervision of Others

During the period of supervision, it is not appropriate for the practitioner to have supervisory responsibilities of other occupational therapy staff or students for the first six (6) weeks of the supervised practice. Following this period and depending on the:

- competence of the practitioner;
- prior supervisory experience of the practitioner;
- prior knowledge and experience in the field of practice.

supervision of occupational therapy staff and students may be added to the practitioners duties.

If special provisions are needed for supervision responsibility, application must be made to the OTC after the first six weeks.

Report of Unsatisfactory Performance

The supervisor must contact the EO if the practitioner is not performing satisfactorily.

The EO may refer the supervisor to the PA for support and advice regarding the supervised practice position and possible revision of the supervised practice plan, which should be amended to include the reasons for poor performance by the practitioner, and measures developed to address these.

If at any time the supervisor decides to withdraw from the period of supervised practice, the OTC and AHPRA must be advised immediately of these changes.

In the case of notifiable conduct, the EO and/or PA will advise the supervisor to make notification to AHPRA in compliance with the mandatory requirement set out in the legislation.

In cases where the practitioner has not achieved the required level of competence within 12 months, the OQAC will have the option of ending the supervision period and determining that the COPC should not be issued. EO will notify the practitioner, supervisor and AHPRA of this decision.

In cases of suspicion of misconduct, the EO will prepare documentation relating to the suspicion, and liaise with the CEO and OQAC to determine an appropriate course of action.

Report of Unsatisfactory Supervision

The practitioner must contact the EO with any concerns relating to the supervision being provided.

The EO may refer the practitioner to the PA for support and advice regarding the supervised practice position and possible revision of the supervised practice plan, which may be amended to include the reasons for poor performance by the supervisor, and measures developed to address these.

If at any time the practitioner decides to withdraw from the period of supervised practice, the OTC and AHPRA must be advised immediately of these changes.

In the case of notifiable conduct, the EO and/or PA will advise the practitioner to make notification to AHPRA in compliance with the mandatory requirement set out in the legislation.

In cases of suspicion of misconduct, the EO will prepare documentation relating to the suspicion, and liaise with the CEO and OQAC to determine an appropriate course of action.

Non-Compliance with Supervised Practice and Reporting Requirements

The EO is responsible for monitoring compliance with supervised practice, including submission of progress reports signed by the practitioner and supervisor. If there is non-compliance with supervised practice or reporting responsibilities, the EO will liaise with the practitioner and supervisor. If the practitioner or supervisor is experiencing difficulty with either the supervised practice plan or reporting, the EO will refer them to the PA for support and assistance.

Should non-compliance continue, the EO will refer the matter to the OQAC for a decision regarding appropriate action. The OQAC is able to defer, rearrange or modify the supervised practice plan, through the involvement of the PA. Continued non-compliance may result in withdrawal of the supervised practice position, with notification sent to AHPRA.

The practitioner may appeal against this decision via the OTC Appeals process.

Process for misconduct

If an area of misconduct is identified that places the public at risk of harm because the practitioner has practised the profession in a way that constitutes a significant departure from accepted professional standards, this should be referred to the OQAC in the first instance and then to the AHPRA.

Payment of fees

The fee for Stage 2 is payable upon submission of the Stage 2 application. If the internationally-qualified practitioner changes position during the period of supervised practice and commences a new position within 12 (twelve) months, a second fee is not payable.

However, if the OTC has withdrawn from a period of supervised practice and the internationally-qualified practitioner commences in a new position within twelve (12) months, the applicable Stage 2 fee will need to be paid upon submission of a new Stage 2 application.

ADMINISTRATIVE PROCEDURE

Role of OTC Executive Officer

- Administration and monitoring of supervised practice process and reporting requirements.
- Administration of appeals process.
- Liaison with OTBA.
- Refer any areas of misconduct to the OQAC.

Role of the Professional Advisor - Assessment of Internationally-Qualified Practitioners

- Provision of support and advice to the practitioner and supervisor when required.
- Review and provision of recommendation to the OQAC regarding approval of Stage 2 application and supervised practice plan.
- Liaison with practitioner and supervisor if required if supervised practice plan not approved.
- Liaison with practitioner and supervisor if competencies not achieved within six months.
- Liaison with practitioner and supervisor if requested to support meeting supervised practice goals or processes.
- Review of progress reports during the supervised practice period.
- Review of Stage 2 final reports and provision of recommendation for a COPC to be issued.
- On request of the EO, provide feedback to practitioners who fail to complete all competencies within 12 months or have reported poor performance.
- If requested by EO, provide feedback on appeals process to practitioners.
- Conflict resolution.

Role of OQAC

- Review assessment documentation and processes in conjunction with EO and PA.
- Review and approval of Stage 2 application and supervised practice plan.
- Approval of final reports and issuing of COPC.
- Oversee practitioners for poor performance or non-compliance with reporting requirements.
- Oversee responsibility for appeals process.
- Assess any area of misconduct.

Number of Attempts

Upon successful completion of the Stage 1 desktop assessment, the practitioner has a minimum of two years in which to commence Stage 2 (supervised practice).

Number of attempts at successfully completing a period of supervised practice will be dependent on the granting of registration status by the AHPRA.

Support and Advice Procedures

Practitioners and supervisors preparing a supervised practice plan for the Stage 2 period of supervised practice may seek support and advice from the EO and/or PA.

The PA will provide support and advice to the supervisor/s and the practitioner in the event of poor performance or non-compliance of supervised practice and reporting requirements.

The PA will contact the practitioner and supervisor if the practitioner has not achieved all competencies within six months. The PA will be notified of this situation by the EO.

Practitioners who have not achieved all competencies within 12 months will be advised of their failure to meet the competency standards, with a copy of the letter forwarded to the OTBA. Details about grounds for appeal and appeal procedures will be provided.

APPEALS PROCESS

Practitioners assessed as not achieving all competencies within 12 months will be advised in writing. The communication will contain details of and reasons why the competencies have not been achieved. Details advising further action available to them, including appeal, will also be provided.

All appeals must be in writing and state clearly the grounds for appeal. Supportive information to address these grounds and to demonstrate that competencies have been met must also be provided.

Written appeals must be received within eight (8) weeks of OTC mailing the notification.

See policy on Appeals.

REFERENCES

Occupational Therapy Australia (2010). *Australian Minimum Competency Standards for New Graduate Occupational Therapists (ACSOT) 2010*.