



EXPLANATORY NOTES AND PROCEDURE

Stage 2 – Period of supervised practice for internationally qualified practitioners

August 2023

Stage 2

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
OQAC	Overseas Qualified Assessment Committee
IAHA	Indigenous Allied Health Australia Ltd

Roles

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

- 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 overseas-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 (hereafter referred to as “practitioner”).

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.

Process

1. Limited registration

Once suitable employment has been sought, the practitioner can submit an application to Ahpra for limited registration using Ahpra form [ALPS-96](#). The Ahpra [SPPA-00](#) form, together with other required

documents should also be provided (Please note Section G of the SPPA-00 form does NOT have to be completed).

All documents can be submitted to Ahpra via the [online upload](#).

Ahpra will notify both the practitioner and OTC when limited registration has been granted, including approved workplace and supervisor.

OTC will email the practitioner with information in relation to the Stage 2 period of supervised practice, including a requirement for the practitioner to advise their commencement date in the position.

SUMMARY

- Practitioner to submit an application to Ahpra for limited registration, providing all required documents.
- Ahpra to advise OTC and practitioner when limited registration has been granted, with details of approved workplace and supervisor.
- OTC to email practitioner with additional information including a requirement for the practitioner to advise their commencement date in the position.

2. Cultural responsiveness training

It is a requirement for all internationally qualified practitioners, seeking registration to practise in Australia, to successfully complete a cultural responsiveness and awareness training program. This program is completed through Indigenous Allied Health Australia (IAHA). The OTC will send an email upon successful completion of Stage 1 with access details to the training.

Levels 1 and 2 of the IAHA training program must be successfully completed prior to submission of the OTC Stage 2 application.

Level 3 of the training program must be completed successfully prior to submission of OTC final reports. A Certificate of Practical completion will not be issued until Level 3 is completed successfully.

- Levels 1 and 2 training can be completed online whilst overseas.
- Level 3 training, depending on timing and time differences, could also be completed whilst overseas.
- Level 3 training should be completed within six months of completing Levels 1 and 2.

The OTC will monitor your progress through the training levels via the IAHA portal.

Further information is available in the cultural responsiveness and awareness training document and the step-by-step guide available in the “assessment” section of the [OTC website](#).

3. Stage 2 application form and supervised practice implementation plan

Within **two (2) weeks** of commencing the period of supervised practice, the practitioner must submit a Stage 2 application and supervised practice implementation plan to the OTC. The Stage 2 application and supporting documentation (practitioner’s CV, supervisor/s CV, position description, evidence of completed Levels 1 and 2 of the cultural training, supervised practice implementation plan and fee) need to be signed, where required, by both practitioner and supervisor.

The Stage 2 application and supervised practice implementation plan is used by the practitioner, supervisor and the OTC to determine learning activities appropriate to the practitioner’s current level of competency, as well as encompassing the current job specifications.

The supervised practice implementation plan is developed using the competencies within the OTBA’s Australian occupational therapy competency standards (2018). The supervised practice implementation plan must be completed using the OTC template, an example of which can be found in the “assessment” section of the OTC website. **Altered formats will not be accepted.**

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 implementation plan must be received by the OTC by the required date outlined in the request for revision. Unless extenuating circumstances are received prior to the required date for submission of the revised supervised practice implementation plan, the OTC EO will advise 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 Implementation Plan signed by both practitioner and supervisor.
- Position description.
- CVs of practitioner and approved supervisor

*Please refer to the fee schedule and the cultural responsiveness and awareness training guide, available in the “assessment” section of the [OTC website](#).

4. Supporting 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 two assessors assigned to the file (one of which is nominated as the team manager) for review and approval.

Both assessors will review the application and provide feedback to the EO with a copy of the completed checklist. This feedback will either require a revision of the supervised practice implementation plan to be undertaken or confirm approval of the Stage 2 application.

On receipt of a revised supervised practice implementation plan (if required) this is then forwarded to the same assessors 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 midway 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 two OQAC assessors for review.
- Both assessors will complete the checklist and return it 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 the same assessors for further review or approval.
- Upon approval by both assessors, EO provides written confirmation to the practitioner, with a copy to Ahpra, outlining practice location, name of supervisor/s, commencement date, period of supervised practice and dates for submission of midway progress and final reports.

The nominated team manager is available to assist the practitioner and supervisor in the development of 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.

5. Working in more than one workplace

Approval may be given to undertake the period of supervised practice in more than one workplace with different supervisors. In this instance, a Stage 2 application and supervised practice plan must be submitted and approved for each individual workplace.

Similarly, separate midway reports and supervision logs need to be submitted, and final reports from both supervisors will also be required.

In order for a Certificate of Practical Completion to be issued, both supervisors will have attested to the practitioner's achievement of competence and endorse independent practice.

6. Midway progress report

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

If the OQAC assessors determine the practitioner has met competence, the practitioner and supervisor will be invited to submit the OTC Stage 2 final report.

SUMMARY

- Practitioner to forward OTC midway report and supervision log, signed by practitioner and supervisor, to OTC.
- EO to review and forward to OQAC assessors assessing Stage 2 application. Every effort will be made to ensure the same assessors remain with the applicant for the duration of the period of supervised practice.
- Feedback – further information or approval – from both OQAC assessors to EO.
- Upon approval, practitioner and supervisor invited to submit OTC Stage 2 final report and for final assessment by OQAC assessors. The practitioner may be asked to provide an updated self-reflection addressing goals outstanding at the midway stage.

7. Final report

At the conclusion of the period of supervised practice, the practitioner will forward to the OTC the OTC Stage 2 final report, evidence of successful completion of Level 3 of the cultural responsiveness and awareness training and, if required an updated self-reflection and supervision log. All documents are signed by both the practitioner and supervisor.

NOTE: If not already provided, evidence of successful completion of Level 3 of the cultural responsiveness and awareness training must be provided with the final report. A Certificate of Practical Completion (COPC), which is required to obtain general registration, will not be issued until evidence of successful completion of Level 3 is provided.

Once approval by both assessors 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 and the number assigned to the certificate.

Until general registration is granted, the practitioner and supervisor must maintain the OTC supervision regime.

SUMMARY

- Stage 2 OTC final report received by OTC.
- EO to review and forward to OQAC assessors.
- Feedback – further information or approval – from both OQAC assessors to EO.
- Upon approval, COPC forwarded to practitioner.

- Information deleted from OQAC assessors' computers.
- Ahpra advised of COPC number.

8. Document security

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

9. 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 the first six weeks to implement the supervised practice plan and to assess competence.

During the first six weeks, there must be four sessions of direct practice observation by the supervisor during the assessment and clinical interventions stages.

If the period of supervised practice is being undertaken in a remote location, direct observation may occur via Skype/Zoom or similar. If the supervisor is not present for the "real-time" consultation, a review of the recording needs to be undertaken by the supervisor.

The frequency of supervision may be reduced to fortnightly after the first six weeks.

Two further sessions of direct observation during the assessment and clinical interventions stages needs to occur between the six-week milestone and submission of the midway progress report.

Supervision sessions must be recorded on the supervision log and detail the type and duration of supervision. It is recommended the supervision log be completed as soon as possible after the supervision has taken place.

The supervisor will be required to:

- assist the practitioner to develop the supervised practice implementation plan, identifying appropriate learning activities and measures, 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 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.

If a new supervisor is required, the practitioner must advise Ahpra as soon as possible.

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.

10. 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 midway 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 implementation plan, learning activities and measures, and forward an updated plan to the OTC. If required, the team manager 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.

11. Change of employment position

Where a change in place of employment occurs during the period of supervised practice, the practitioner must advise Ahpra immediately.

The practitioner cannot commence in a new position with a new supervisor until approval has been received by Ahpra.

Depending on when, during the period of supervised practice the change occurs, the first supervisor may be required to complete the midway 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.

12. 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 by the supervisor must be made to the OTC after the first six weeks.

13. Report of unsatisfactory performance of the internationally qualified practitioner

The supervisor must contact the EO if the practitioner is not performing satisfactorily. To assist in determining what is classified as “unsatisfactory performance”, this is defined under the National Law and available via the link below:

.....the knowledge, skill or judgment possessed, or care exercised by, the practitioner in the practice of the health profession in which the practitioner is registeredis below the standard reasonably expected of a health practitioner of an equivalent level of training or experience.

[Health Practitioner Regulation National Law Act 2009 (Queensland) - *As in force in each State and Territory*. – Part 1 Preliminary, [s5] Definitions]

Ref. http://www5.austlii.edu.au/au/legis/qld/consol_act/hprnla2009428/sch1.html

The EO may refer the supervisor to the team manager for support and advice regarding the supervised practice position and possible revision of the supervised practice implementation 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 team manager will advise the supervisor to make notification to Ahpra in compliance with the mandatory requirements 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.

14. Report of unsatisfactory supervision provided by a supervisor

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

To assist in determining what is classified “unsatisfactory supervision” please refer to the link below:

Guidelines approved by a National Board may be used as evidence of what constitutes appropriate professional conduct or practice for occupational therapy in proceedings against a health practitioner under the National Law, or a law of a co-regulatory jurisdiction.

Ref.

<https://www.occupationaltherapyboard.gov.au/Search.aspx?q=supervisor+guidelines+for+OTs>

The EO may refer the practitioner to the team manager 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 team manager will advise the practitioner to make notification to Ahpra in compliance with the mandatory requirements 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.

15. Non-compliance with supervised practice and reporting requirements

The EO is responsible for monitoring compliance with supervised practice, including submission of midway 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 team manager 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 implementation plan, through the involvement of the team manager. 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.

16. 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.

17. Payment of fees

The fee for Stage 2 is payable upon submission of the Stage 2 application. If the 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 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 procedures

Role of OTC Executive Officer

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

Role of the team manager - 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 actions 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.
- Review and approval of Stage 2 application and supervised practice implementation 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 Ahpra.

Support and advice procedures

- Practitioners and supervisors preparing a supervised practice implementation plan for the Stage 2 period of supervised practice may seek support and advice from the EO.
- The team leader 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 team leader will contact the practitioner and supervisor if the practitioner has not achieved all competencies within six months. The team leader 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

Australian occupational therapy competency standards

<https://www.occupationaltherapyboard.gov.au/Codes-Guidelines/Competencies.aspx>