



Australian Health Ministers' Advisory Council
National Registration and Accreditation Implementation Project

16 November 2009

Mr Robert Fendall
Chair
Osteopathy Board of Australia
PO Box 16085
Collins Street West
MELBOURNE VIC 8007

Dear Mr Fendall

I am writing to you as Chair of the AHMAC Governance Committee for the National Registration and Accreditation Scheme (NRAS) and in response to the consultation paper on registration standards and related matters released by your Board on 27 October 2009. The Governance Committee comprises Health CEOs from all States, Territories and the Commonwealth and the views expressed in this response represent the agreed views of CEOs from all jurisdictions.

The purpose of this response is to assist the Board in finalising its proposals to be put to Ministerial Council by the end of December 2009. In providing these comments the Governance Committee notes that it has not had the benefit of seeing submissions from other stakeholders or been able to take these into account.

Firstly, may I take this opportunity to congratulate the Osteopathy Board of Australia for the effort and detailed consideration put into development of the proposals for the future registration arrangements for the osteopathic profession in Australia from 1 July 2010. It is encouraging to see the clarity of your proposals and how much work has been undertaken by the Board in a relatively short period of time.

In relation to the proposals you have developed for mandatory registration standards, Health CEOs consider that the Board's proposals address the key regulatory requirements expected in these standards and as such we support them. I note that two of the proposed registration standards, those relating to criminal history and English language skills, are proposed as common or with common elements for all national boards. This joint approach across all boards is particularly welcome. I also note and support the assessment you have undertaken of these proposed standards against the Agency's procedures for development of registration standards.

CEOs would like to make three general comments on the consultation papers:

- It is important that boards review their proposed standards to remove any potential for unlawful discrimination against groups of persons applying for registration. This could be done by ensuring standards are crafted around competencies and qualifications and not, for example, treating applicants or registrants differently solely on their country of birth.

- Recency of practice requirements as proposed vary across professions from three to five years with different hurdle requirements. CEOs consider it would be useful for those boards using less than five years as the period of recency of practice, to consider whether they may wish to go to five years.
- In presenting their final proposals to Ministerial Council boards may wish to consider providing limited text around their proposals and focussing their papers on the registration standards and other matters which are to be put forward for approval.

I have attached to this letter, further detail of the Governance Committee's response to each of the proposals in the Osteopathy Board of Australia's consultation paper on registration standards and related matters. I advise that the Committee has no objection to the Board making this letter and its attachment available on your website.

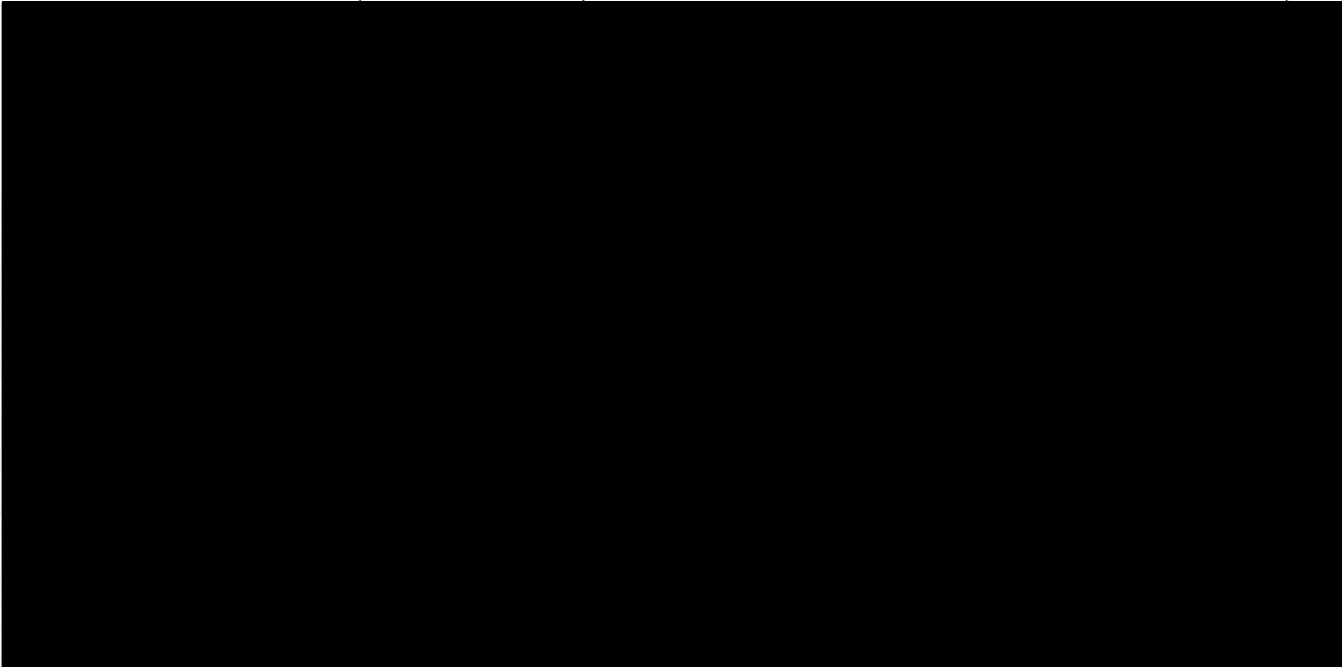
Yours sincerely



Michael Reid
Chair, NRAS Governance Committee
Director General
Queensland Health

Attached: Detailed Governance Committee response to the Osteopathy Board of Australia

NRAS Governance Committee response to the Osteopathy Board of
Australia consultation paper

Name of proposal	Overview response	Detailed suggestions for board consideration
		
English language (common) registration standard	Supported	<p>It is noted that some national boards intend to apply the tests very widely in the applicant population. Boards may wish to consider carefully the benefits of very wide application against the costs imposed on applicants by this approach.</p> <p>It is also noted that education providers require different and frequently lower levels of English competence than registration authorities. Over time, it may be possible to include an English language standard at the point of professional graduation which meets the registration standard.</p>
