COTRB 5/2002

24 March 2003

Ms M Eibisch
MRA Review
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Ms Eibisch

RE: REVIEW OF MRA AND TTMRA

The COTRB (Australia & New Zealand) welcomes the opportunity to make a written submission on the review.

In general the Council is of the view that the MRA & TTMRA has fostered and enhanced workforce mobility between Australian States and Territories and New Zealand.

Since its introduction occupational therapists have found it much easier to move from State to State without the necessity of obtaining initial registration in each State/Territory.

The Registration Boards in Australia & New Zealand have worked closely to adopt uniform registration procedures and requirements to allow the smooth running of MRA & TTMRA. Without this uniformity the Council could imagine friction occurring between Australian States & Territories and New Zealand should one jurisdiction implement much lower standards than the others.

In order to improve the operation and effectiveness of MRA & TTMRA the Council recommends the following changes to the legislation:

1) Identity

The present legislation does not require an applicant to prove his or her identity. The Council could envisage a situation whereby a person could assume the name of a registered person interstate or in New Zealand and easily obtain deemed registration in another State or New Zealand should the identity of that person not be closely examined.

Recommendation

The Council recommends that the MRA & TTMRA legislation be amended so that a person applying for registration must prove beyond doubt his or her identity.

2) One Month Time Limit

At present registration must be granted within one month after the notice is lodged with the local registration authority. Only during this period of one month can the local registration authority postpone or refuse the grant of registration.

The Council does not consider this time long enough given that some Registration Boards do not meet that regularly. Even in the case of where Registration Boards meet on a monthly basis the application/notice may not be received in time to make the agenda for the next meeting - thus causing the application to be considered 5-6 weeks from the date it is lodged.

Recommendation

The Council recommends that the MRA and TTMRA legislation be amended to increase the time limit to consider an application/notice by a local registration authority to 2-3 months.

3) Residency Requirement

It is clear that some overseas trained professionals are registering in New Zealand, where the registration requirements may be less than in Australia (or vice versa) and immediately travelling to Australia and gaining registration under TTMRA.

There are instances where persons gain registration with the New Zealand Occupational Therapy Board, without ever setting foot in New Zealand, with the sole intention to bypass the Australian overseas trained occupational therapist skilled assessment process.

The Council is of the opinion that a 6 month residency requirement in New Zealand (or vice versa) may resolve this problem.

Recommendation

The Council recommends that the TTMRA legislation be amended so that a person must prove to the local registration authority a period of 6 months residency in either Australia or New Zealand when lodging a notice under TTMRA.

The Council looks forward to being kept informed of the review progress.

Yours sincerely

Peter Martin
EXECUTIVE OFFICER

Cc Australian & New Zealand OT Registration Boards